Proposed Mitigated Negative Declaration

Sonoma County Permit and Resource Management Department
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Publication Date:	July 14, 2025
Public Review Period:	30 days
State Clearinghouse Number:	
Permit Sonoma File Number:	**PLP25-0015** (MNS15-0005)
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PROJECT DATA

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

Project:	Bennett Valley Minor Subdivision
Applicant:	Always Engineering, 131 Stony Circle, Ste 1000, Santa Rosa, CA 95401
Owner:	Bruce Mcdonald, 82 Rossi Ave, San Francisco, CA 94118
Location:	4700 Bennett Valley, Santa Rosa
APN:	049-170-037
General Plan:	DA 10 (Diverse Agriculture), 10-acre density
Zoning:	DA B6 10/5 (10-acre density/5-acre minimum lot size), SR (Scenic Resource: landscape unit), OAK (Oak Woodland)
Decision Body:	Project Review Advisory Committee Board of Zoning Adjustments
Appeal Body:	Planning Commission
Description:	Minor Subdivision and Use Permit request for tentative map approval to create four separate parcels on 50.99 acres, including one designated remainder (DR) of 10 acres for continued residential use, three new parcels of 11.51 acres (Lot 1), 10.00 acres (Lot 2), and 19.47 acres (Lot 3) for single-family development potential, and removal (type conversion) with required replacement of 1.55 acres of Oak woodland habitat for related access improvements and individual lot development, located at 4700 Bennett Valley, Santa Rosa; APN 049-170-037; Supervisorial District 1.

ENVIRONMENTAL FACTORS

This project potentially affects the environmental factors identified below and discussed within the attached Initial Study. Those checked under “Yes” involve at least one impact identified as either “Potentially Significant” or “Less than Significant with Mitigation”. Those checked under “No” are determined “Less than Significant” or involving “No Impact”.

Environmental Factors		Abbreviation	Yes	No
1.	Aesthetics	VIS	x	
2.	Agriculture & Forestry Resources	AG		x
3.	Air Quality	AIR		x

Environmental Factors (continued)		Abbreviation	Yes	No
4.	Biological Resources	BIO	x	
5.	Cultural Resources	CUL	x	
6.	Energy	ENE		x
7.	Geology and Soils	GEO	x	
8.	Greenhouse Gas Emission	GHG		x
9.	Hazards and Hazardous Materials	HAZ		x
10.	Hydrology and Water Quality	HYD		x
11.	Land Use and Planning	LU		x
12.	Mineral Resources	MNR		x
13.	Noise	NOI		x
14.	Population and Housing	POP		x
15.	Public Services	PUB		x
16.	Recreation	REC		x
17.	Transportation	TRA		x
18.	Tribal Cultural Resources	TCR	x	
19.	Utilities and Service Systems	UTL		x
20.	Wildfire	FIRE		x
21.	Mandatory Findings of Significance	MFS		x

RESPONSIBLE AND TRUSTEE AGENCIES

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

Agency	Activity	Authorization
U. S. Army Corps of Engineers	Wetland dredge or fill Work in navigable waters	Clean Water Act, Section 401 Rivers and Harbors Act, Section 106
Regional Water Quality Control Board (North Coast or San Francisco Bay)	Discharge or potential discharge to waters of the state Wetland dredge or fill	California Clean Water Act (Porter Cologen) – Waste Discharge requirements, general permit or waiver. Clean Water Act, Section 404
State Water Resources Control Board	Generating stormwater (construction, industrial, or municipal)	National Pollutant Discharge Elimination System (NPDES) requires submittal of NOI
California Department of Fish and Wildlife	Lake or streambed alteration	Fish and Game Code, Section 1600
Bay Area Air Quality Management District (BAAQMD)	Stationary air emissions	BAAQMD Rules and Regulations (Regulation 2, Rule 1 – General Requirements; Regulation 2, Rule 2 – New Source Review; Regulation 9 – Rule 8 – NOx and CO
Northern Sonoma County Air Pollution Control District (NSCAPCD)	Stationary air emissions	

Agency (Continued)	Activity	Authorization
U. S. Fish and Wildlife Service (FWS) and or National Marine Fisheries Service (NMFS)	Incidental take permit for listed plant and animal species	Endangered Species Act
Native American Heritage Commission		
State Historic Preservation Office		

ENVIRONMENTAL FINDING

Based on the evaluation in the attached Initial Study, I find that the project described above could not have a significant effect on the environment, and a Negative Declaration is proposed.

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

_____ _____

Prepared by: Date

I. INTRODUCTION:

The project applicant, Always Engineering, on behalf of landowner Bruce McDonald, proposes to subdivide 50.99 acres into four separate parcels, including three new parcels for single-family development potential on 11.51 acres (Lot 1), 10.00 acres (Lot 2) , and 19.47 acres (Lot 3), and one designated remainder parcel for continued residential use on 10.00 acres (Remainder), located at 4700 Bennett Valley, Santa Rosa; APN 049-170-037; Supervisorial District 1. A referral letter has been sent to the appropriate local, state and federal agencies and interest groups who may wish to comment on the project.

This report is the Initial Study required by the California Environmental Quality Act (CEQA). The report was prepared by Derik Michaelson, Project Review Planner for the Sonoma County Permit and Resource Management Department, Project Review Division. Information on the project has been provided by the project applicant. Technical studies were provided by qualified consultants to support the conclusions in this Expanded Initial Study. Technical studies, other reports, documents, and maps referred to in this document are available for review through the Project Planner at the Permit and Resource Management Department (Permit Sonoma), and may be downloaded for review from the following site: Download website.

Please contact Planner Derik Michaelson for more information at derik.michaelson@sonomacounty.gov, or direct at (707) 565-3095.

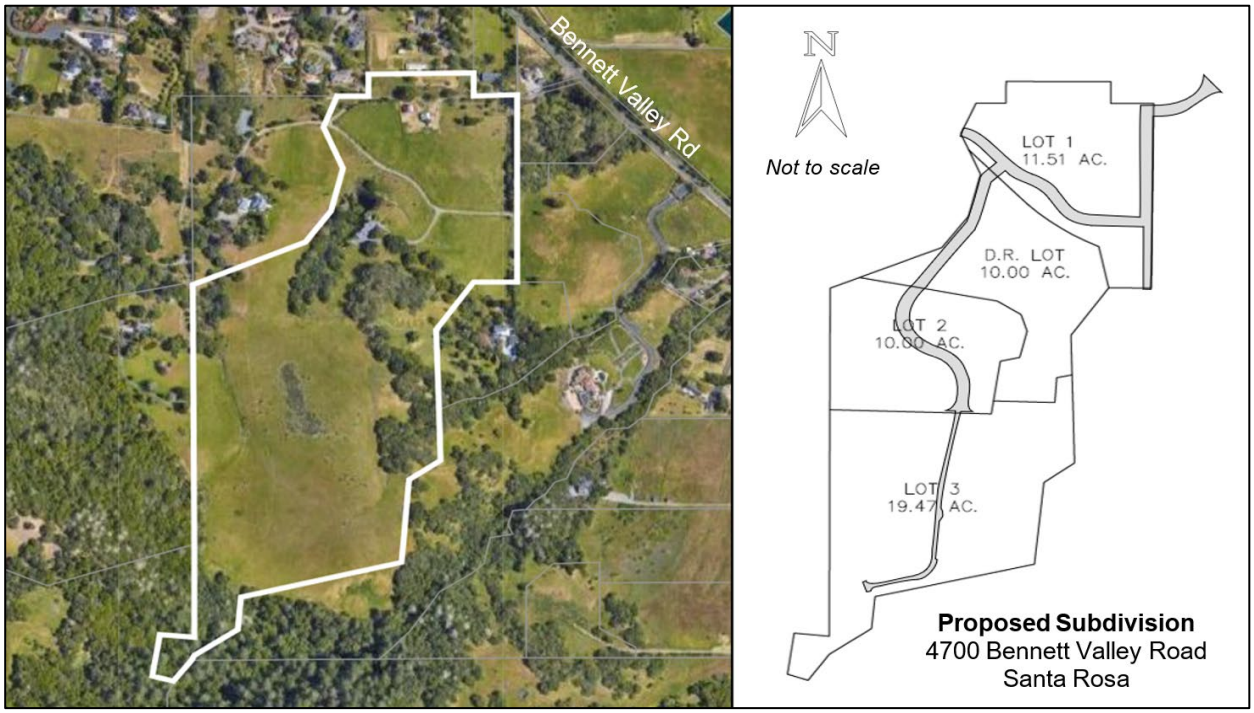
II. PROJECT DESCRIPTION

This project is to subdivide a 50.99-acre parcel into three new lots for single-family development and one designated remainder lot for continued residential use. Proposed site access includes a 20-foot-wide paved roadway serving the four parcels from Bennett Valley Road. Sanitation service includes on-site septic systems proposed for each parcel. A shared water system is proposed with individual easements serving each parcel from an on-site existing well. The proposed parcel sizes and maximum development potential for each lot is summarized below.

Lot 1:	11.51	1 residence +1 accessary unit
DR:	10.00	(existing residence) +1 accessary unit
Lot 2:	10.00	1 residence +1 accessary unit
Lot 3:	19.47	1 residence +1 accessary unit

Lot 1
Lot 1 is a 11.51-acre site located at the lowermost (+/-360ft) elevation of the property. The site contains an average slope of 5.9 percent abuts the rear of developed residential parcels fronting Bennett Valley Road to the north. Existing vegetation consists of grass area with various live oak trees along its northerly border and four Redwood trees near its westerly boundary. An existing driveway serves the site at its north-easterly frontage. Two older barn structures exist toward the center of the site and are proposed to remain. The tentative map locates the septic boundary and a 0.35-acre building envelope for future residential development adjacent to the existing barn structures toward the driveway entrance at the north-easterly corner of the site.

Remainder Lot
The Designated Remainder lot is 10.0 acres and will retain the existing single-family home and on-site septic system (leachfield) for continued residential use. The Remainder lot begins the property's transition



toward the higher site elevations of the subject property. The average slope of the Remainder lot from its lowest (+/-380ft) to highest (+/-490ft) elevation is 35 percent. Vegetation consists of grasses and distinct groves of Oak woodland areas throughout. An existing pond with perennial wetlands on its lower banks is also located on the Remainder parcel. The pond collects flow from the swale and Waters of the State above and feeds into another wetland channel below the outfall of the pond. Geotechnical slides also exist on this lot near the south and westerly portions of its proposed lot boundaries. The existing septic system is located at the south part of the lot. With exception to required access improvements extending across the westerly boundary of the site, no further development of the remainder parcel is proposed by the project.

Lot 2

Lot 2 is a 10.00-acre site located just above the northerly Remainder parcel. The Lot 2 site contains an average slope of 10.7 percent and consists of mostly grassland with an intersecting portion of Oak woodland extending from the remainder lot below. There are two wetlands on this lot which are located close to the swale that flows to the north on the west side of the lot. A geotechnical zone of deep creeping soils is located at the northeast corner of the lot. The tentative map locates the 0.55-acre proposed building envelope and adjacent septic area for future development near the easterly boundary of the site, at +/-535ft site elevation. A portion of the septic system requires removal of existing Oak woodland habitat.

Lot 3

Lot 3 at 19.47 acres is the largest of the four parcels and located at the upper site elevations of project ranging from +/-560ft up to +/-770ft.The upper site acreage averages approximately 15 percent slope and intersects Oak woodlands at its south-west uppermost corner near building envelope BE-1. The site contains mostly native grasses with various wetland features established along its westerly boundary. Additional wetland features exist at the northeasterly corner of the site near the natural swale and Waters of the State, which flows north to northeast. Additional constraints include a geotechnical slide located the northeast corner and center of the proposed lot. Development potential for Lot 3 includes three building envelopes with an average size of 0.58 acres. The proposed septic system is located near the northeast corner of the site. The tentative map locates the building envelopes, septic system, and a 12-foot- wide access driveway to avoid the existing wetland features and slide areas. The 0.49-acre building envelope BE-1 and a portion of the septic area requires removal of existing Oak woodland habitat.

Access

Existing site access is provided by means of a shared roadway serving the subject property and four adjacent parcels from Bennett Valley Road. The existing access road is fully paved and averages 12 feet in width. The current proposal is to widen and extend the existing roadway and access easement to serve the project as well as the adjacent parcels. The project will increase the existing roadway to twenty (20') feet in width and extend a new alignment up to the frontage of Lot 3. The extended alignment will turn southward along the westerly boundary of the Remainder lot and upward through the center of Lot 2. The tentative map shows a 12-foot-wide driveway serving Lot 3 thereafter.

Portions of the new roadway segment extending through the Remainder parcel and Lot 2 will exceed 15 percent, to a maximum of 20 percent slope. The access design includes slopes up to 20 percent and vertical curves of 30'-50' to sufficiently align with the existing lower access grade, maintain a 50ft setback from the adjacent pond on the remainder lot, and reach the Lot 2 and Lot 3 building pads above. The County Fire Marshal supports the proposed access design and has approved the following code exceptions as requested for the project.

13-31 (a) - roadway grades of 15-20% from Station 1+50' to 3+00' due to setback to existing creek
13-31 (a) - driveway grades of 15-20% from 17+00' to Station 20+00' due to setback to existing pond.
13-31 (b) - Vertical curves of 30' at Station 17+00.
13-37 (b) - turnout spacing of 600' for one turnout due to grading setback to existing pond.
13-31 (e) - Cool down areas reduced to 30' due to grading limitations on the steep driveway..

Water

The project proposes use of the existing on-site well to serve all four (4) parcels. Easements for a shared water system are proposed. According to the Project Engineer, Always Engineering, the existing well is located near the residence on the proposed designated remainder parcel. The existing well is 290' deep per the well log. The well will serve the designated remainder, and Lots 1, 2 and 3 with appropriate, recorded easements.

Sanitation

There will be septic systems for all lots under a separate permit. Septic dispersal systems (SDS) have also been designated for each of the lots, including the designated remainder. The SDS in Lot 1 would be a mound system or at grade. Vegetation would be removed and the ground scarified. A mound of soil material would be placed approximately 3 to 4 feet high. For the remaining lots, the SDS would consist of a pressure distributed septic system or a subsurface drip irrigation system. The pressure distributed septic system is built with 12" to 48" deep trenches which would be excavated on contours; the excavated areas for would be filled with gravel and pipe. The subsurface drip irrigation system is built with drip irrigation tubing buried 12" into native soil, on contour. Where possible, the excavated areas will avoid trees, however, the tree root systems could be impacted. An arborist report is included in this submittal.

Oak Woodland

The 50.99-acre site intersects with portions of the Oak Woodland Combining District and proposes site access and lot development improvements resulting in the loss of Oak woodland habitat across six locations on the property. A total of 1.55 woodland acres, including approximately 69 Oak trees, is anticipated for removal. The project includes a comprehensive tree inventory report identifying the type, size, and location of trees planned for removal. Current zoning provisions refer to removed Oak woodland acreage as "Type Conversion" and require use permit approval for converted areas exceeding 0.5 acres. The Use Permit component of the subdivision proposal includes a preliminary Oak Woodland and Protected Tree Removal program. The program identifies the specific location and associated acreage requiring replacement for each of the six affected woodland sites as summarized below.

SITE 1:	Access (entry segment)	0.030
SITE 2:	Access (Lot 1 segment)	0.135
SITE 3:	Access (DR segment)	0.238
SITE 4:	Lot 2 (septic envelope)	0.283
SITE 5:	Lot 3 (septic envelope)	0.263
SITE 6:	Lot 3 (building envelope 1)	0.603
		1.552 acres

Protected Trees
The 11.51-acre site proposed for Lot 1 site is located outside the Oak Woodland Combining District and contains several projected trees as defined by County ordinance. A total of nine protected trees are anticipated for removal, including four Coast Redwoods and two Coast Live Oaks between six inches and 12 inches in diameter, plus three Coast Live Oak between 12 and 18 inches in diameter. The individual removal of protected trees on Lot 1 are subject to specific replacement requirements per County ordinance and are not part of the required use permit component for affected Oak woodland sites.

III. SETTING

This property is a previously developed parcel with an existing house, existing on-site septic system (leachfield), existing driveway and existing pond. The parcel receives existing access from Bennett Valley Road via a network of existing paved driveways of approximately 3,077 feet in length and 12 feet in width, which also two adjacent properties. The 50.99-acre site is located on the southwest side of Bennett Valley Road and bounded by undeveloped lands on the north, east, south, and west.

The developed parcel contains an existing residence, an on-site septic system (leachfield) and driveway. There is a 3,077-foot long by 12-foot-wide existing paved driveway that is used to serve the property currently. This is a shared access used by adjacent neighbors. There is an existing well on-site which is to be used for all four (4) parcels. Easements for a shared water system will be provided. The new driveway will follow the driveway easement shown. All current County setbacks, from existing drainage courses, will be applied, including a current grading setback of 25 feet from the flow line of the on-site drainage.

The roughly rectangular-shaped parcel is situated on the eastern slope of Taylor Mountain and ranges in elevation between 341 feet at its north-eastly boundary, nearest Bennet Valley Road, and up to 745 feet at its highest point at its southwestern most boundary. Matanzas Creek is located 1330 feet east of the site where it flows from southeast to northwest. Several wetlands and seeps occur on the property, as well as several drainages, none of which are identified as blue lines on the topographic map. These wetlands and seeps are shown on the proposed tentative map. Surrounding land uses consist of mainly of open space lands consisting of ranches and rural residences located along Bennett Valley Road.

IV. ISSUES RAISED BY THE PUBLIC OR AGENCIES

Permit Sonoma has prepared and circulated a project referral packet informing and providing opportunity for comments to selected relevant local, state and federal agencies; and to special interest groups that were anticipated to take interest in the project. Participating local agencies have responded with recommended conditions of approval for the project. At the time of this initial study, no responding public agency or interest group has raised a particular issue concerning the current proposal.

Native American Consultation
On September 14, 2015, Permit Sonoma circulated its initial agency referral packet providing opportunity for comments concerning project to selected relevant local, state and federal agencies, special interest groups anticipated to take interest in the project, and to local tribes for consultation purposes. On January 18, 2017, Tomaras & Ogas LLP on behalf of the Lytton Rancheria Tribe, confirmed it had completed its review of the February 24, 2016, Cultural Resource Study for the project and was not requesting consultation.

Assembly Bill 52, which went into effect in July 2015, is an amendment to CEQA Section 5097.94 of the Public Resources Code. AB52 established a consultation process with all California Native American tribes identified by the Native American Heritage Commission (NAHC) with cultural ties to an area and created a new class of resources under CEQA known as Tribal Cultural Resource. The County of Sonoma, as the Lead Agency under CEQA, is responsible for complying with the requirements of CEQA Section 5097.94 of the Public Resources Code.

On April 9, 2024, Permit Sonoma sent formal consultation letters to tribal groups associated with the project area to ensure compliance with Assembly Bill 52. On April 10, 2024, the Tribal Heritage

Preservation Officer for the Federated Tribes of Graton Rancheria responded to formally request consultation for this project. To date, no other responses or communications have been received from the native community regarding this project.

On July 24, 2024, Permit Sonoma met with representatives of the Federated Tribes of Graton Rancheria for consultation under AB52. Permit Sonoma proposes mitigation measures recommended by the applicant's archaeological consultant to ensure avoidance of potential adverse impacts to cultural resources. The Tribe requested further time to review the project area and submitted cultural studies for the project.

On May 1, 2025, and on May 29, 2025, Permit Sonoma requested follow-up consultation meetings with Graton Rancheria. As of the of scheduling this initial study for publication, Permit Sonoma has not received a response for Graton Rancheria regarding a follow-up consultation meeting. Permit Sonoma acknowledges the Tribe has the right to review and provide input on the recommended mitigation measures for the project in response to 30-day public review period required this Initial Study following its formal publication.

V. OTHER RELATED PROJECTS

There are no active projects of significance proposed within the vicinity of the subject project.

VI. EVALUATION OF ENVIRONMENTAL IMPACTS

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

> **No Impact: The project would not have the impact described.** The project may have a beneficial effect, but there is no potential for the project to create or add increment to the impact described.
>
> **Less Than Significant Impact**: The project would have the impact described, but the impact would not be significant. Mitigation is not required, although the project applicant may choose to modify the project to avoid the impacts.
>
> **Less Than Significant with Mitigation Incorporated:** The project would have the impact described, and the impact could be significant. One or more mitigation measures have been identified that will reduce the impact to a less than significant level.
>
> **Potentially Significant Impact:** The project would have the impact described, and the impact could be significant. The impact cannot be reduced to less than significant by incorporating mitigation measures. An environmental impact report must be prepared for this project. M

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

The project applicant has agreed to accept all mitigation measures listed in this Initial Study as conditions of approval for the proposed project, and to obtain all necessary permits, notify all contractors, agents and employees involved in project implementation and any new owners should the property be transferred to ensure compliance with the mitigation measures.

VII. SOURCE DOCUMENTS

The following documents are referenced or were developed in preparation of this Initial Study and are hereby incorporated as part of this publication.

Available for download at: https://share.sonoma-county.org/link/oReBQr3q_bM/

1. Project Application: Proposal Statement and Tentative Map
2. Submitted Technical Studies:
    a. Fire Safe Compliance Letter, Losh & Associates 2025
    b. Geological Feasibility Study (Preliminary), PJC & Associates, 2017
    c. Geologic Report (Update), PJC & Associates, 2022
    d. Habitat Assessment, Jane Valerius Environmental Consulting and Wildlife Research Associates, 2022
    e. Horticultural Associates, 2022, updated 2025
    f. Hydrologic Evaluation of Upland Wetlands, O'Connor Environmental, 2022
    g. Stormwater LID Submittal, Almost Always Engineering, 2022
3. Confidential Reports (Unavailable for Public Review):
    a. Cultural Resources Study, Hennessey and Barrow, 2016
    b. Archaeological Addendum and Architectural Resources, Langford and Hoffman, 2024
4. Agency Referral Comments
5. Public Comments

Available by reference on Permit Sonoma website: https://permitsonoma.org/

6. Adopted Long Range Plans
    a. Aggregate Resources Management Plan
    b. Community Wildfire Protection Plan
    c. Hazard Mitigation Plan
    d. Sonoma County General Plan
7. Regulations & Initiatives
    a. Riparian Corridor (RC) Combining Zone
    b. Septic Regulations – Onsite Waste Treatment System Manual
    c. Sonoma County Zoning Ordinance
    d. Tree Ordinances and Regulations
    e. Water Efficient Landscape Ordinance

Available by reference on Public Agency website:

8. Alquist-Priolo Special Studies Zones; State of California; 1983. www.conservation.ca.gov/cgs/alquist-priolo
9. BAAQMD CEQA Guidelines; Bay Area Air Quality Management District; http://www.arb.ca.gov/.
10. California Environmental Quality Act (CEQA) Statute & Guidelines https://www.califaep.org/statute_and_guidelines.php
11. California Environmental Protection Agency http://www.calepa.ca.gov/SiteCleanup/corteseList/default.htm;
12. California Regional Water Quality Control Board https://www.waterboards.ca.gov/
13. California Department of Toxic Substances Control Management Board https://dtsc.ca.gov/dtscs-cortese-list/
14. North Coast Regional Water Quality Control Board https://www.waterboards.ca.gov/northcoast/
15. Sustainable Groundwater Management Act (SGMA) https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management
16. Santa Rosa Plain Watershed Groundwater Management Plan, Advisory Panel https://rpcity.granicus.com/MetaViewer.php?view_id=4&clip_id=518&meta_id=43080

1. AESTHETICS:

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

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

Comment:
The proposed Project site is located within Sonoma County, about three miles southeast of the City of Santa Rosa. The approximately 51-acre site currently contains one residence, a modified water tower, and two barns, and is surrounded by Bennett Valley Cemetery and Galvin Community Park to the northeast, residential uses to the north, and forested open space as well as some residential uses to the south and west.

The Project is in an area designated as visually sensitive by the Sonoma County General Plan. The project site is located within the SR (Scenic Resource) combining district and designated as a Scenic Landscape Unit per the Sonoma County Zoning Map. The subdivision is designed to utilize existing topography and vegetation to screen proposed building envelopes and improvements from public view, though will also create single-family development potential on certain upper elevations of the site that are visible to the valley surroundings. Specifically, the exposure of a new home and associated improvements on Lot 3 may adversely affect the visual character and value of the site as a scenic resource. The tentative map identifies the location for planting required native trees to serve as natural screening that will minimize visual impacts associated with the development of building envelope BE-2 on Lot 3.

Additionally, the SR (Scenic Resource) combining district provides that the County give special attention through the Design Review process to the final site plan and architectural details proposed for each lot before issuance of grading or building permits for construction. Required design review considerations promote within the limits of each building envelope site-specific design compatibility with the scenic character of the surroundings to further ensure minimization of associated visual impacts.

The implementation details for native tree planting on Lot 3 are described in Mitigation VIS-1 and VIS-2 below. The mitigation and monitoring requirements under VIS-1 and VIS-2 ensure the screening trees retain the scenic value of the site while minimizing potential impacts of the otherwise exposed development to a less than significant level.

Significance Level:
Less than Significant with Mitigation

Mitigation:
Mitigation VIS-1: A preliminary planting plan shall be recorded on the final map specifying the quantity, type, size, and placement of native trees in natural-appearing groupings to provide development screening for lot 3.

> Monitoring VIS-1: Prior to recording the parcel map, Permit Sonoma planning staff shall review and approve for map recordation the applicant's submittal of a preliminary planting prepared by a qualified arborist specifying the quantity, type, size, and grouped placement of native trees serving as natural development screening on lot 3.

Mitigation VIS-2: The applicant shall install and maintain natural-appearing groupings of native trees as indicated on the Final Map before commencing with building construction on Lot 3.

> Monitoring VIS-2: Permit Sonoma shall not grant final building permit occupancy on Lot 3 until owner/applicant verifies completed installation and healthy status of the required screening trees. Permit Sonoma Planning will verify the Mitigation and Monitoring for VIS-2 is noted on the Final Map and transfers to related building permit plans prior to providing clearance for map recordation and subsequent permit issuance.

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

Comment:
The project is not located within a State Scenic Highway.[1,2] As a result, the proposed project would not result in impacts to a scenic vista or highway.

Significance Level:
No Impact

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

Comment:
The project site is mostly vacant and is surrounded by residential, recreational, and open space uses. Implementation of the proposed project would result in the conversion of vacant land to developed residential uses and would therefore include alteration of the visual character of the project area as seen from the valley surroundings. The proposed structures on Lot 3 would be the most visible to surrounding uses due to their location on the slope on the project site. However, the landscape plan for the project includes a naturally clustered line of trees and other landscaping elements that would act as a visual screening buffer along the northeast edge of the proposed building BE-2 on Lot 3. The placement of native trees, to be determined by a qualified arborist, will screen the proposed building to views from existing uses. Additionally, while developing the vacant lot would alter the visual character of the project site, the existing project area includes residential uses of a similar scale to the proposed residences as well as recreational uses, such that the proposed project would be in keeping with the existing visual character.

Significance Level:
Less than significant with Mitigation

Mitigation:
Implement Mitigations VIS-1 and VIS-2

d. Create a new source of substantial light or glare which would adversely affect day or nighttime view in the area?

Comment:
Although the proposed project site is located adjacent to existing development, the site itself is currently vacant and emits little light or glare; implementation of the proposed project could therefore result in new sources of spillover lighting or glare effects in the project area. These sources may include building lighting or lighting of access road areas.

However, the proposed project would be subject to Sonoma County General Plan 2020 policies. The plan contains policies and programs to reduce the adverse effects of excessive lighting. Policy OSRC-4a would require all lighting to be cast downward and to be at no more than both the minimum height required and the power necessary for the proposed use. This policy would therefore limit excessive lighting and reduce the amount of wasted light unnecessarily directed upwards, minimizing sky glow. Policy OSRC-4b would prohibit continuous all-night lighting except for security and

1 California Department of Transportation. California State Scenic Highway System Map. Available: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=026e830c914c495797c969a3e5668538.

2 California Department of Transportation, 2023. List of eligible and officially designated State Scenic Highways. Available: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

operational purposes. This policy would maintain dark skies in rural areas during nighttime hours and result in aesthetic and biotic benefits. Policy OSRC-4c would discourage light levels in excess of industry and State standards. This policy would reduce lighting impacts to visual resources by incorporating progressive State and industrial standards into the project design and review process.

Compliance with the outlined policies would ensure that the proposed project would not result in adverse impacts related to light and glare, and that the proposed project would be compatible with existing development in the project area. Results of the proposed project related to light and glare would be less than significant.

Significance Level:
Less than significant with Mitigation

Mitigation:
Implement Mitigations VIS-1 and VIS-2

2. AGRICULTURE AND FOREST RESOURCES:

The approximately 51-acre site is located in a rural portion of Sonoma County surrounded by residential development, community uses, open space, and other non-agricultural uses. The project site's vegetation includes mowed grasses and native woodland trees such as Coast Live Oak, Valley Oak, Black Oak, Oregon Oak, and California Bay Laurel.

The site and its near vicinity are not used for any agricultural purposes. The project site is not under an active Williamson Act contract. No existing agricultural or timber-harvest uses are located on, or in the vicinity of, the project site.

The Sonoma County General Plan 2020 EIR discusses the potential impact of development under the General Plan on agricultural resources (Chapter 4.8). The General Plan contains policies to reduce the amount of conversion of agricultural land that would occur through several mechanisms. These include the economic promotion of Sonoma County agricultural goods to increase farm profitability, an urban centered growth strategy to stabilize the urban fringe and maintaining low rural development densities. The General Plan EIR concludes that the impact of the Plan on agricultural resources within the county is less than significant.

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

Would the project:

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

Comment:
The Project site is not currently being used for any agricultural purposes. The California Department of Conservation, Important Farmland Finder (part of the FMMP survey), shows that the site is within the "Grazing Land" designation, and is surrounded primarily by Urban and Built-Up Land. The Project site does not contain land that is classified as Prime Farmland, Unique Farmland, or Farmland of

Statewide Importance based on the FMMP survey.3 The project site does not contain soils designated as Important Farmland (i.e., Prime Farmland, Unique Farmland or Farmland of Statewide Importance) as well. Therefore, the proposed project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. There would be no impact.

Significance Level:
No Impact

b. Conflict with existing zoning for agricultural use, or Williamson Act Contract?

Comment:
The project site is zoned DA B6 10/5 (Ac/DU)/Ac MIN, SR and is designated as Diverse Agriculture (DA 10) under the Sonoma County General Plan 2020, which allows for a residential development density of 10 acres per unit and permits a range of housing types including single-family dwelling. The project site is not currently used for agricultural purposes. Further, the project site is not governed by a Williamson Act contract. Therefore, though the zoning and land use designation for the site allow for agricultural uses, the proposed residential use would be consistent with the allowable uses onsite, and no Williamson Act land would be affected. Therefore, the impact would be less than significant.

Significance Level:
Less than Significant.

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

Comment:
The proposed project site is not forest lands or zoned for forestry or timberland (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), nor is the site zoned for Timberland Production (as defined by Government Code section 51104(g)). The project site is located in an area surrounded primarily by rural residential and other rural development land uses. As such, there would be no impact to forestry and timberland and timberland production/resources.

Significance Level:
No Impact.

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

Comment:
As discussed above under Comment 2.c, the project site does not have any forest or designated for forestry. There will be no loss of forest land or conversion of forest land to non-forest use. Therefore, there would be no impact.

Significance Level:
No Impact

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

Comment:
The project site is located in a rural setting with developed uses such as residential communities, a cemetery, and a community park. The site is not part of any proposal, due to the location or nature

3 California Department of Conservation. Farmland Mapping and Monitoring Program. Available: https://www.conservation.ca.gov/dlrp/fmmp.

that would lead to conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest uses. There would be no impact.

Significance Level:
No Impact

3. AIR QUALITY:

Though the State and federal ambient air quality standards cover a wide variety of pollutants, a few key pollutants are most prominent in Sonoma County, due to either the extent of emissions or the climate of the region. These pollutants include ozone, particulate matter, diesel exhaust, wood smoke, and toxic air contaminants.

Sensitive receptors, as described in the General Plan EIR, are facilities where sensitive receptor population groups (i.e., children, the elderly, the acutely ill, and chronically ill) are likely to be located. These land uses include residences, schools, retirement homes, convalescent homes, hospitals, and medical clinics. The proposed project site is located near sensitive receptors, as there are existing residences directly to the west and east of the project site, and onsite in the proposed Designated Remainder Lot.

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

Would the project:

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

Comment:
The General Plan EIR found that there would be a significant and unavoidable impact related to the Plan's consistency with Clean Air Plan assumptions. While development under the General Plan would be consistent with the Association of Bay Area Government (ABAG) population projections which were used in the regional Clean Air Plan, VMT within Sonoma County is expected to increase at a rate greater than population. The General Plan includes a number of policies which would work to reduce VMT in the county, such as Policies LU-1b, LU-1f, LU-1g, and LU-1i which would require ongoing reviews and actions related to growth and development. However, the forecasted rate of VMT increase would still result in a significant countywide impact related to implementation of the Clean Air Plan. The proposed project itself, however, would not conflict with or obstruct implementation of the Clean Air Plan. As described in Section 2.17, *Transportation*, the project would result in a less-than-significant impact related to VMT and would not include any other project characteristics which could conflict with the Clean Air Plan. The impact would be less than significant.

Significance Level:
Less than Significant

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

Comment:
Sonoma County is currently a non-attainment region for three criteria pollutants, including 8-Hour Ozone and PM-2.5.[4] However, the County is classified as marginal or moderate for these pollutants which occur only within part of the County. The proposed project itself would not result in a

[4] EPA, 2023. California Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants. Available: https://www3.epa.gov/airquality/greenbook/anayo_ca.html

cumulatively considerable net increase of any criteria pollutant beyond what is already considered in the General Plan EIR. The proposed project is of negligible size to be considered as having a considerable contribution to the increase of criteria pollutants within the County. The project would be consistent with General Plan Policies such as HE-6h, which would continue to review and develop energy conservation, green building, and energy efficient design programs for new residential development. The impact would be less than significant.

Significance Level:
Less than Significant

c. Expose sensitive receptors to substantial pollutant concentrations?

Comment:
While there are sensitive receptors located in residences adjacent to the proposed project site, they would not be exposed to substantial pollutant concentrations or other emissions resulting from construction and operation of the project. The project would utilize BAAQMD's Best Management Practices for Construction-Related Fugitive Dust Emissions, such as that all driveways to be paved shall be completed as soon as possible.[5] Project operation would not expose any nearby receptors to substantial pollutant concentrations or odorous emissions beyond what already occurs onsite. The impact would be less than significant.

Significance Level:
Less than Significant

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

Comment:
While there are sensitive receptors located in residences adjacent to the proposed project site, they would not be exposed to substantial pollutant concentrations or other emissions resulting from construction and operation of the project. The project would utilize BAAQMD's Best Management Practices for Construction-Related Fugitive Dust Emissions, such as that all driveways to be paved shall be completed as soon as possible.[5] Project operation would not expose any nearby receptors to substantial pollutant concentrations or odorous emissions beyond what already occurs onsite. The impact would be less than significant.

Significance Level:
Less than Significant

4. BIOLOGICAL RESOURCES:

Environmental Setting
The project area is located within the North Coast Province.6 This province is located along the Pacific coast from the California-Oregon border to the San Francisco Bay watershed to the south. The eastern boundary includes the Cascade Range along the northern portion of the province and the transition to the Sacramento Valley along the southern portion. The coastal mountain ranges within the province are aligned somewhat parallel and rise from low to moderate elevation (up to about 7,500 feet). The climate varies considerably across the province, with high precipitation levels and moderate temperatures in many coastal areas, and dry conditions with rain shadow effects and more extreme temperatures in some

[5] Bay Area Air Quality Management District, 2022. 2022 CEQA Guidelines. Available: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?sc_lang=en.

[6] Jane Valerius Environmental Consulting and Wildlife Research Associates. 2022. *Habitat Assessment – 4700 Bennett Valley Road*.

inland valleys. Overall, the province has a fairly wet climate and receives more rainfall than any other part of the state, feeding more than ten river systems.

The North Coast Province vegetation consists predominantly of conifer and mixed-conifer forests bisected by chaparral stands, riparian forests, and wetlands. Valley and foothill grassland and woodland communities emerge along the central and southern eastern border of the province, while coastal wetlands and marshes appear along the coastline. Specifically, Douglas-fir, mixed-evergreen, western hardwoods, and chaparral-mountain shrub dominate the province.

The project parcel ranges in elevation between 745 feet in the southwest and 341 feet in the northeast and is situated on the eastern slope of Taylor Mountain. Matanzas Creek, located 1,330 feet east of the site, flows from southeast to northwest. Several wetlands and seeps occur on the property, as well as several drainages.

Would the project:

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

Comment:

California Red-Legged Frog
California red-legged frogs occur within the study area, use the onsite pond for breeding habitat, and likely move through the upland habitat as a movement corridor.7 The proposed roadway construction could impact individual California red-legged frogs. Development of the roadway onsite as well as the development of residences as part of the proposed project would result in the loss of upland habitat for California red-legged frog. Loss of upland habitat may impact the population within the Matanzas Creek watershed. To reduce the potential impacts to California red-legged frog, Mitigation Measures BIO-1 and BIO-2 provide impact avoidance, minimization, and compensation measures, the implementation of which would reduce potential impacts to California red-legged frog to less than significant.

Western Pond Turtles
Western pond turtles may occur within the vicinity of the project area and may use the onsite pond and move through the upland habitat as a movement corridor. Road construction and individual residential development may impact western pond turtles. The impact avoidance, minimization, and compensation measures included in Mitigation Measure BIO-1 would also be effective in reducing potential impacts western pond turtles, such the implementation of Mitigation Measure BIO-1 would reduce impacts to western pond turtle to a less-than-significant level.

Passerine and Raptor Nesting
Passerines and raptors nesting in the project area could be impacted if construction occurs during the nesting season, which takes place from March through August. To reduce the potential impacts to passerines and nesting raptors, Mitigation Measure BIO-3 provides impact avoidance, minimization, and compensation measures, the implementation of which would reduce potential impacts to passerines and nesting raptors to less than significant.

Roosting Bats
Roosting bats could be threatened by the removal of approximately 25 trees within the proposed building envelopes if the trees provide suitable roosting habitat and are removed during seasonal periods of inactivity. Roosting bats that use structures onsite are threatened by the renovation, removal, or demolition of those structures during seasonal periods of inactivity or without first conducting humane bat eviction or partial dismantling under supervision of a qualified biologist

specializing in bat species. To reduce the potential impacts to roosting bat species, Mitigation BIO-4 provides a protocol for the removal of trees on the project site that would minimize potential impacts to roosting bats, if potential roosting habitat is present within the proposed project footprint. With implementation of Mitigation Measure BIO-4, impacts to roosting bats would be reduced to less than significant.

Significance Level:
Less than Significant with Mitigation

Mitigation:

California Red-Legged Frog

Mitigation BIO-1: The project proponent shall implement the following measures to minimize and avoid individual California red-legged frog, measures that would additionally benefit western pond turtle, if present.

a. Immediately prior to the start of work, a pre-construction survey shall be conducted in the construction area for CRF by a USFWS-approved biologist. If CRF are found, the USFWS shall be notified, the project work shall immediately stop, and the relocation of the individual shall be completed with approval by the USFWS, prior to the recommencement of project work.
b. A USFWS-approved biologist shall conduct an Employee Education Program for all construction personnel. At a minimum, the training will include a description of the CRF and their habitat, the importance of the species and their habitats, and the general measures that are being implemented to protect the CRF as they relate to the project. Instruction shall include the appropriate protocol to follow in the event CRF are found onsite.
c. The number of access routes, number and size of staging areas, and the total area of activity, shall be limited to the minimum necessary to achieve the project goal. The USFWS-approved biological monitor will identify the boundaries of the work and staging area and ensure that the contractor does not disturb any ground outside the designated construction area. The contractor shall obtain approval from the monitor to go outside designated areas.
d. A USFWS-approved biologist shall be present during initial grading activities. Thereafter, an onsite person shall be designated to monitor onsite compliance with all minimization measures. The USFWS-approved biologist shall ensure that this individual receives training consistent with that outlined in the Biological Opinion.
e. Best Management Practices shall be implemented during construction to prevent any construction debris or sediment from impacting adjacent habitat.
f. During all phases of project operations, all trash that may attract CRF predators shall be properly contained and removed from the site.
g. The fueling and maintenance of vehicles and other equipment shall occur at least 20 meters from any riparian habitat or water body.

Monitoring BIO-1: Permit Sonoma Planning shall not clear for issuance any permit(s) for ground-disturbing activities until after the applicant submits an implementation schedule addressing the planned completion of each mitigation requirement identified under BIO-1.

California Red-Legged Frog Upland Habitat

Mitigation BIO-2: To mitigate for the loss of upland habitat for California red-legged frog due to construction of the roadway or residences, purchase of mitigation credits at a 3:1 ratio (i.e., for every acre (or portion) lost, three acres will be set aside in perpetuity) will be required, as described in the Programmatic Biological Opinion (USFWS 2014). Approval from the County of Sonoma to build the roadway will be based on adherence to FESA and CESA by obtaining and complying with the actions required in permits issued by the USFWS and CDFW, respectively. Alternatively, mitigation for loss of habitat may occur onsite through a Conservation Easement between the project proponent and a third party, such as the Sonoma Land Trust. The mitigation ratio shall be 2:1 unless the USFWS requires a different ratio.

Monitoring: BIO-2: Permit Sonoma Planning shall not clear for issuance any permit(s) for ground-disturbing activities until the applicant submits evidence of securing the appropriate Agency approvals and purchasing the required mitigation credits.

Passerines and Raptors

Mitigation BIO-3: The following mitigation measures should be followed in order to avoid or minimize impacts to passerines and raptors that may potentially nest in trees.

a. Grading or removal of trees should be conducted outside the nesting season, which occurs between approximately February 1 and August 31.
b. If grading between August 31 and February 1 is infeasible and groundbreaking must occur within the nesting season, a pre-construction nesting bird (both passerine and raptor) survey of the grasslands and adjacent trees shall be performed by a qualified biologist within 7 days of ground breaking. If no nesting birds are observed, no further action is required, and grading shall occur within one week of the survey to prevent "take" of individual birds that could begin nesting after the survey.
c. If active bird nests (either passerine and/or raptor) are observed during the pre-construction survey, a disturbance-free buffer zone shall be established around the nest tree(s) until the young have fledged, as determined by a qualified biologist.
d. The radius of the required buffer zone can vary depending on the species (i.e., 75-100 feet for passerines and 200-300 feet for raptors), with the dimensions of any required buffer zones to be determined by a qualified biologist. If buffer zones are reduced beyond those specified, consult with CDFW.
e. To delineate the buffer zone around a nesting tree, orange construction fencing shall be placed at the specified radius from the base of the tree within which no machinery or workers shall intrude.
f. After the fencing is in place, there will be no restrictions on grading or construction activities outside the prescribed buffer zones.

Monitoring BIO-3: Permit Sonoma Planning shall not clear for issuance any permit(s) for ground-disturbing activities until after the applicant submits an implementation schedule addressing the planned completion of each mitigation requirement identified under BIO-3.

Roosting Bat

Mitigation BIO-4: To prevent take of individual roosting bats, a habitat assessment of the trees to be removed should be conducted by a qualified bat biologist prior to tree removal.

If suitable potential roosting habitat is present in the trees to be removed, an assumption of presence is made and measures to prevent take of individuals will be taken. These measures include a two-step tree removal, whereby non-habitat trees are removed on the first day and the potentially suitable roosting habitat trees are removed on the second day. This tree removal must be supervised by a qualified bat biologist who will direct the tree removers on how to limb specific trees prior to removal. Two-step removal of bat habitat trees must only be conducted during seasonal periods of bat activity, which are, in this region, between March 1 (or after evening temperatures rise above 45F and/or no more than ½" of rainfall within 24 hours occurs), and April 15, or between August 31 and October 15 (or before evening temperatures fall below 45F and/or more than ½" of rainfall within 24 hours occurs).

Monitoring BIO-4: Permit Sonoma Planning shall not clear for issuance any permit(s) for ground-disturbing activities until verifying the applicant's submittal of an appropriate implementation schedule addressing the planned completion of each mitigation requirement identified under BIO-4.

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

Comment:
See Comment 4.a.

Significance Level:
Less than Significant with Mitigation

Mitigation
Mitigation BIO-1 thru BIO-4

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

Comment:
With the exception of Lot 3, the proposed building envelopes have been sited to avoid impacting any wetlands or waters of the U.S. or State, and any associated woodland riparian vegetation. However, there would be 454 square feet of wetlands impacted by the development of the Lot 3 road access. Under relevant regulatory policy, the project applicant is required to acquire applicable Federal and State wetland permits for impacts to wetlands. The process for acquiring and complying with relevant wetland permits includes the precise delineation of waters of the U.S. or State, the quantification of impacts to waters of the U.S. or State, restoration of temporary impacts, and the on- or off-site replacement of wetland habitat or the acquisition of compensatory mitigation as required by the permitting agencies. Completion of this required process would result in a less than significant impact related to state or federally protected wetlands.

Significance Level:
Less than Significant.

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

Comment
See Comment 4.a

Significance Level
Less than significant with mitigation.

Mitigation
Mitigation BIO-1 thru BIO-4

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

Comment:
In April 2024, the Sonoma County Board of Supervisors adopted Ordinance 6469 and Ordinance 6478 establishing the County's current tree protection measures and mitigation planting requirements for replacement of protected trees and Oak Woodland areas approved for removal with new development, including on lands subject to the Oak Woodland Combining District pursuant to Article 67 and for the individual removal of protected trees pursuant to Zoning Section 26-88-015. The following discusses required mitigation measures consistent with the County's current Ordinance

provisions for addressing project impacts associated with the proposed removal of Oak woodland areas and individual protected trees.

Article 67 – Oak Woodland Combining District Compliance

The project proposes site access improvements and lot development activities resulting in the loss of existing Oak woodland habitat across six locations on the site. A total of 1.55 woodland acres, including approximately 70 Oak trees, is anticipated for removal. The ordinance refers to removed woodland acreage as "Type Conversion".

The County's Oak Woodland Combining District requires replacement of converted woodland areas to ensure no net loss of habitat. The Ordinance establishes mitigation ratios based on the habitat quality of converted woodland sites. Mitigation requirements range between three acres, two acres, and one acre of required woodland replacement for every acre converted, including ratios at 3:1 for Class I (Superior Oak habitat), 2:1 for Class II (Oak habitat), and 1:1 for Class III (Limited Quality Oak habitat). Woodland replacement requires on- or off-site replanting and ongoing monitoring of associated vegetative strata of the converted area, including canopy, subcanopy, shrub, herb and bryophyte.

Each of the six affected woodland sites for the project has been evaluated to determine the woodland location and acreage that will be converted for anticipated access improvements and subsequent lot development activities.A final mitigation plan confirming the habitat class and replacement ratio for each affected woodland site is required before development activities may commence. Completion of the woodland replacement is required before final agency inspection and clearance of completed development activities for each site may be issued. Mitigation BIO-6 below details the implementation requirements ensuring Ordinance compliance and no net loss of woodland habitat for each site.

Section 26-88-015 – Tree Protection Ordinance Compliance

The project proposes future development activities resulting in the removal of protected trees outside the Oak Woodland Combining District. A total of nine protected trees located within the septic system envelope and building envelope on Lot 1 are anticipated for removal.

The County's Tree Protection Ordinance requires replanting of protected trees in accordance with the provisions specified under Code Section 26-88-015. The provisions require replanting of the same native species based on replacement ratios and planting size requirements determined by the size of each removed tree. For future development on Lot 1, four protected Coast Redwoods and two protected Coast Live Oaks ranging between six inches and 12 inches in diameter and three protected Coast Live Oak between 12 and 18 inches in size will likely be removed for new home construction and septic improvements.

Mitigation BIO-7 below provides the implementation details for incorporating into the project tree replacement ratios and planting sizes requirements consistent with the County's current zoning provisions. Replacing the loss of protected tree resources as provided by current zoning standards reduces the associated level of impact proposed by the project to less than significant.

Protection Measures for Remaining Trees

Proposed tree removals and related development activities for the project may adversely impact nearby protected trees and adjacent Oak woodland areas not planned for removal or conversion. Mitigation BIO-5 below specifies the implementation of required protection measures to minimize potential adverse impacts on remaining protected trees and woodland areas to a less than significant level, including on adjacent lands

Significance Level:
Less than significant with mitigation.

Mitigation:

Tree Preservation

Mitigation BIO-5: Tree Protection Standards. Permit applications involving disturbance on or within the protected perimeter of retained protected trees, including on adjacent lands and as identified for preservation in the project tree inventory report prepared by Horticultural Associates, updated June 2025, shall be subject to the following construction standards prior to initiating development activities, unless the director waives one (1) or more standards.

a. Protected trees, their protected perimeter and whether they are to be retained or removed are to be clearly shown on all improvement plans. A note shall be placed on the improvement plans as follows: NOTE ON PLANS: "Construction is subject to requirements established by Sonoma County to protect certain trees."
b. Before the start of any clearing, excavation, construction or other work on the site, every tree designated for protection on the approved site plan shall be clearly delineated with a substantial barrier (steel posts and barbed wire, chain link fencing, orange construction fencing, or other exclusionary barrier) at the protected perimeter or limits established during the permit process. All trees to be removed shall be clearly marked and the delineated protection perimeter shall remain in place for the duration of all work.
c. A 4-inch layer of chipped bark mulch shall be placed over the soil surface within the fenced dripline prior to installing temporary fencing. A scheme shall be established for the removal and disposal of brush, earth and other debris as to avoid injury to any protected tree.
d. For trees specifically identified for preservation in the project tree inventory report, pruning activities to clean the canopy shall be completed per International Society of Arboriculture pruning standards.
e. Underground trenching for utilities shall avoid tree roots within the protected perimeter. If avoidance is impractical, tunnels should be made below major roots. If tunnels are impractical and cutting roots is required, it shall be done by hand-sawn cuts after hand digging trenches. Trenches shall be consolidated to serve as many units as possible.
f. Compaction within the protected perimeter shall be avoided.
g. Paving with either concrete or asphalt over the protected perimeter should be avoided. If paving over the protected perimeter cannot be avoided, affected trees shall be treated as removed for purposes of calculating arboreal values.
h. Permit applications proposing the unplanned removal of one (1) or more protected trees shall demonstrate that no feasible options are available to avoid removal or impacts to protected trees.
i. For trees located within or adjacent to septic system boundaries and identified for preservation, the tree protection guidelines for drip irrigation septic system installation as provided in the project tree inventory report shall be followed accordingly.
j. If any damage to a protected tree should occur during or as a result of work on the site, the county shall be promptly notified of such damage. If a protected tree is damaged so that it cannot be preserved in a healthy state, the planning director shall require replacement in accordance with the arboreal value chart. If on-site replacement is not feasible, the applicant shall pay the in-lieu fee to the tree replacement fund.

Monitoring BIO-5: Permit Sonoma Planning shall not clear for issuance any permit(s) for ground-disturbing activities until verifying the applicant's submittal of an appropriate plan or other related materials demonstrating compliance with the mitigation requirements identified under BIO-5.

Oak Woodland Replacement

Mitigation BIO 6: Oak Woodland Replacement. The type conversion and removal of existing Oak Woodland habitat for the construction of required subdivision improvements and subsequent lot development shall be replaced on-site or within Sonoma County at mitigation ratios consistent with those established under Chapter 26, Article 67 of the Sonoma County Code to ensure no net loss of existing habitat:

a. Replacement ratio. Required replacement ratios shall include three acres (3:1) for every acre of Superior Oak (Class III) habitat removed, two acres (2:1) for every acre of Oak (Class II) habitat removed, and one acre (1:1) for every acre of Limited Quality Oak (Class I) habitat removed.

b. Final Mitigation Plan. Before issuance of grading permits for access road improvements and septic permits and/or grading permits for individual lot development, applicant/owner shall submit a *Final Mitigation Plan* for affected woodland areas, or for any combination thereof, confirming the ecological habitat designation, acreage, and required replacement ratio for affected woodland site(s) as identified in the *Preliminary Oak Woodland and Protected Tree Removal Program* for the project.
    i. The mitigation plan shall detail the on- or off-site location and required replacement acreages for the replanting and ongoing conservation of associated vegetative strata of the converted area, including canopy, subcanopy, shrub, herb and bryophyte.
    ii. All on-site or off-site replacement of converted woodland sites shall be contiguous with or adjacent to existing Woodland habitat so as not to result in the creation of a separate oak woodland.
    iii. Implementation of required protection measures shall be shown for all protected trees within the affected proximity of those identified for removal, including on adjacent lands.
c. Monitoring and Reporting. Mitigation planting shall have a planning horizon for the establishment of the woodland within twenty-five (25) years, or as otherwise recommended by a qualified professional as part of the final Mitigation Plan. Applicant/owner shall monitor and report annually to Permit Sonoma Planning on woodland conservation areas. Any mortality that occurs during the reporting period shall be replaced.
d. Program Implementation. Oak woodland replacement shall be completed and subject to annual reporting prior to final inspection and clearance of permitted construction activities in two phases. Phase I shall apply to woodland sites affected by construction of required subdivision improvements, including widening of the existing access road and installation of related infrastructure. Phase II shall apply to remaining woodland sites affected by development activities for each individual lot, including improvements relating to septic system, site access, or building envelope construction.
a. In-lieu fee. Payment of replacement in-lieu fees may be permitted by the County if replacement or mitigation is infeasible as determined by the County for physical, ecological, legal, or economic reasons. Replacement fees, if applicable, shall be valued using the most recent version of Council of Tree and Landscape Appraisers' Guide for Plant Appraisal.
b. Conservation Easement. Alternatively, a conservation easement encompassing twice the total area specified for replacement in the *Final Mitigation Plan(s)* may be executed and recorded. Areas under easement must be located in Sonoma County, must contain woodland of equal or greater oak woodland ecological category, and must contain similar species composition.

Monitoring BIO-6: Planning staff shall verify (a) owner/applicant's submittal a zoning permit and Final Mitigation Plan before clearing issuance of any permits for construction activities on Oak woodland sites; and (b) owner/applicant's submittal of sufficient evidence verifying completion of the required woodland replacement before granting final agency inspection or clearance of permitted subdivision improvements, or final occupancy for individual lots.

Protected Tree Removals

Mitigation BIO-7: Protected Tree Removals. The proposed removal of protected trees in areas undesignated by the OAK Woodland Combining District shall be replanted of the same native species at replacement ratios consistent with the provisions under Section 26-88-015 of the Sonoma County Code.

a. The arboreal value (AV) identified in the Preliminary Tree removal Program and associated Tree Inventory Report for the project shall be used to calculate the required replacement number or in-lieu fee payment for each removed tree.
b. Applicant/owner shall submit a final mitigation plan identifying the location of mitigation plantings on-site, off-site, or on a combination thereof, and a plan for monitoring the success of each replanted tree. All replacement trees must come from nurseries where they have been irrigated.
c. Where off-site mitigation plantings are planned, in whole or part, submit evidence acceptable to the director that suitable on-site locations are not available. Where mitigation plantings are utilized, and off-site planting is permitted, off-site locations that are geographically close to the on-site location of tree removal are encouraged, including on other lots within the subdivision.
d. Monitoring shall be required for a period of seven years to ensure the success of replanted tress. An annual report identifying the status of mitigation plantings' success shall be prepared and submitted

to Permit Sonoma Planning, including confirmed replacement of any mortality that should occur during the reporting period.

Monitoring BIO-7: Planning staff shall verify of (a) owner/applicant's submittal of the Final Mitigation Plan before clearing issuance of any permits for development of Lot 1, including improvements relating to septic system, site access, storm water control, and building envelope construction, and (b) owner/applicant's submittal of sufficient evidence demonstrating completion of the required tree replacements before granting final occupancy.

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

Comment:
The proposed project would comply with all applicable policies and regulations and would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Significance Level:
No Impact.

5. CULTURAL RESOURCES:

This section relies on the information and findings presented in the project's cultural resources technical reports:

- *A Cultural Study of the Property at 4700 Bennett Valley Road, Santa Rosa, Sonoma County, California* (Hennessey and Barrow, 2022)8
- *Subject: Addendum Archaeological and Architectural Resources Inventory Report for the 4700 Bennett Valley Road Project, Sonoma County, California* (Langford and Hoffman, 2024)9

These studies include an overview of the environmental, ethnographic, and historic background of the project site, with an emphasis on aspects related to human occupation. NOTE: These studies are not available for public review.

Background Research
A records search at the Northwest Information Center (NWIC) of the California Historical Resources Information System was conducted on December 1, 2015 (File No. 15-0815). The review included the project site with a 0.25-mile buffer. The NWIC records search indicated that four previously recorded cultural resources (P-49-000822, -001175, -003301, -003304) have been recorded within 0.25 mile of the project site, none of which are mapped within or immediately adjacent to the project site. The NWIC records also show that six previous cultural resources studies have been conducted within 0.25 mile of the project site, only one of which covered any of the project site, and that being only a very small portion.

Ethnographic Literature Research
The *Bitakomtara* was the Southern Pomo tribelet in the Santa Rosa area. The *Bitakomtara* area encompassed approximately 150–200 square miles, bound on the north by Mark West Creek, the east by the Mayacamas Mountains and Sonoma Mountain, the south by the southern extent of the Russian River watershed (just north of Cotati), and the west by the Laguna de Santa Rosa. Obsidian was obtained at

8 Hennessy, Rachel and Eileen Barrow. A Cultural Study of the Property at 4700 Bennett Valley Road, Santa Rosa, Sonoma County, California, Prepared by Tom Origer & Associates, Rohnert Park, CA, Prepared for Always Engineering, 2016, rev. 2022.

9 Langford, Amy, and Robin Hoffman. *Subject: Addendum Archaeological and Architectural Resources Inventory Report for the 4700 Bennett Valley Road Project, Sonoma County, California*, Prepared by Environmental Science Associates, Petaluma, CA, 2024.

Annadel Mountain, approximately 2 miles east of the project site. Seasonal trips to Bodega and the mouth of the Russian River were made to obtain clams and other seafood. The tribelet consisted of three villages: *Wilok* (head of Santa Rosa Creek [approximately 6 miles northeast of the project site]), *Kabetciuwa* (eastern Santa Rosa, along the south bank of Santa Rosa Creek [approximately 2.5 miles north of the project site]), and *Hukabetyawi* (immediately west of downtown Santa Rosa [approximately 3.5 miles northwest of the project site)1011.

Native American Correspondence
In November 2015 and February 2022, Tom Origer & Associates contacted the California Native American Heritage Commission (NAHC) in request of searches of the NAHC's Sacred Lands File (SLF) and a list of Native American representatives who may have interest in the project. The NAHC response provided a list of contacts for California Native American Tribes (Tribes). In November 2015, Tom Origer & Associates sent letters to two of the Tribes (Federated Indians of Graton Rancheria, Ya-Ka-Ama) in the NAHC contacts list. In February 2022, Tom Origer & Associates sent similar letters to 11 Tribes. No responses to those letters have been received to date.

On September 14, 2015, in support of required Native American consultation for the Project pursuant to California Public Resource Code (PRC) Section 21080.3, the County sent project notifications to associated tribal groups requesting that the recipients notify the County if they would like to consult pursuant to PRC Section 21080.3. On January 5, 2017, Brenda Tomaras (Lytton Rancheria) sent an email to the County requesting a copy of the cultural resources study report for the project. On January 13, 2017, the County forwarded Tomaras the cultural study via email, and on January 18, 2017, Tomaras replied with confirmation that Lytton Rancheria did not seek additional consultation on the project.

in July 2015, Assembly Bill 52 (AB52) went into effect amending CEQA Section 5097.94 of the Public Resources Code. AB52 establishes a consultation process with all California Native American tribes identified by the Native American Heritage Commission (NAHC) with cultural ties to an area. AB52 also creates a new class of resources under CEQA known as Tribal Cultural Resource. The County of Sonoma, as the Lead Agency under CEQA, is responsible for complying with the requirements of CEQA Section 5097.94 of the Public Resources Code. On April 9, 2024, Permit Sonoma sent formal consultation letters to associated tribal groups in accordance with Assembly Bill 52. On April 10, 2024, the Tribal Heritage Preservation Officer for the Federated Tribes of Graton Rancheria responded with a formal request for consultation on this project. To date, no other responses or communications have been received from the native community regarding this project.

On July 24, 2024, Permit Sonoma met with representatives of the Federated Tribes of Graton Rancheria for consultation under AB52. Permit Sonoma proposes mitigation measures recommended by the applicant's archaeological consultant to ensure avoidance of potential adverse impacts to cultural resources. The Tribe requested further time to review the project area and submitted cultural studies for the project.

On May 1, 2025, and on May 29, 2025, Permit Sonoma requested follow-up consultation meetings with Graton Rancheria. As of the of scheduling this initial study for publication, Permit Sonoma has not received a response for Graton Rancheria regarding a follow-up consultation meeting. Permit Sonoma acknowledges the Tribe has the right to review and provide input on the recommended mitigation measures for the project in response to 30-day public review period required this Initial Study following its formal publication.

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10 Stewart, Suzanne B, Adrian Praetzellis, Mary Praetzellis, Jack McIlroy, Jack Meyer, Mark D Selverston, Robert Douglass, Pam McKernan, Elaine-Maryse Solari, Archaeological Survey Report and Treatment Plan for a Proposed Project in Sonoma County in Santa Rosa on Route Son-101 from the State Route 12 Interchange to Just North of Steele Lane *[04-SON-101 KP 31.2-35.7 (PM 19.5-22.2) EA 245400, Contract Nos. 04-A0833 and 04-A1380*, Prepared by the Anthropological Studies Center, Sonoma State University, Rohnert Park, CA, Prepared for Caltrans District 4, Oakland, CA, 2002.

11 Barrett, Samuel A, The Ethno-Geography of the Pomo and Neighboring Indians. University of California Publications in American Archaeology and Ethnology 6(1):1–332, 1908.

Fieldwork
Tom Origer & Associates completed pedestrian surface surveys of the project site in December 2015 and February 2022, covering the entire project site. That study identified one cultural resource in the project site, the McDonald Site, described as having both an historic-era archaeological component (multiple artifact concentrations) and historic-era architectural resources (two barns, one water tower, one barbeque). That study also mentioned the presence of a mortared stone building in the project site.
In February 2024, Environmental Science Associates conducted a focused pedestrian surface survey of the portions of the project site where Tom Origer & Associates had identified cultural resources. These areas were: (1) the McDonald Site, including the historic-era archaeological component and historic-era architectural resources (two barns, one water tower, one barbeque); and (2) the mortared stone building in the southern portion of the project site. ESA took additional data on these resources and named the latter the McDonald Chapel. ESA did not observe any archaeological material at two of the three archaeological concentrations at the McDonald Site that were originally noted by Tom Origer & Associates.

Identified Cultural Resources

- The McDonald Site. The McDonald Site is an historic-era site with both an archaeological component (one sparse artifact concentrations with glass and ceramics) and architectural component (two barns, barbeque, water tower). The archaeological material at the site dates to as early as 1870, while the barns and water tower date to the early 20th century and the barbeque to the middle of the 20th century. ESA evaluated the resource for eligibility for listing in the California Register of Historical Resources (California Register), recommending it not eligible[12].
- The McDonald Chapel. The McDonald Chapel is an historic-era architectural resource consisting of a small unfinished stone building constructed of mortared local basalt without flooring or a roof. Communications with former landowners of the project site indicated that the resource was intended to be a wedding chapel. ESA evaluated the resource for California Register-eligibility, recommending it not eligible[13].

Would the project:

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

Comment:
The following discussion focuses on architectural resources. Archaeological resources, including archaeological resources that are potentially historical resources according to *CEQA Guidelines* Section 15064.5, are addressed under question b, below.

Through a records search, background research, and field surveys, two architectural resources (McDonald Site, McDonald Chapel) have been identified in the project site. Both resources were evaluated as not eligible for the California Register. As such, there are no architectural resources in the project site that qualify as historical resources, as defined in CEQA Guidelines Section 15064.5. Therefore, the project is not anticipated to impact any historical resources and no mitigation is required.

Significance Level:
No impact.

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

Comment:

[12] Langford and Hoffman, 2024.
[13] Ibid.

This section discusses archaeological resources, both as historical resources according to *CEQA Guidelines* Section 15064.5, as well as unique archaeological resources, as defined in PRC Section 21083.2(g).

Through a records search, background research, and field surveys, one cultural resource with an archaeological component (the McDonald Site) has been identified in the project site. The resource was evaluated as not eligible for the California Register. Therefore, no archaeological resources that qualify as historical resources or unique archaeological resources appear to be present in the project site and the project is not anticipated to impact any such resources.

However, because the project includes ground-disturbing activities, there is the potential for the discovery of buried archaeological resources during construction. If any previously unrecorded archaeological resources are identified during construction and were found to qualify as a historical resource, as defined in CEQA Guidelines Section 15064.5, or a unique archaeological resource, as defined in PRC Section 21083.2(g), any impacts to the resource resulting from the project could be potentially significant. Any such potentially significant impacts would be reduced to a less-than-significant level with implementation of Mitigation Measure CUL-1.

Significance Level:
Less than significant with Mitigation

Mitigation

Mitigation CUL-1:
If archaeological resources are encountered during project implementation, all construction activities within 100 feet shall halt, and a qualified archaeologist, defined as an archaeologist meeting the *U.S. Secretary of the Interior's Historic Preservation Professional Qualification Standards* for Archeology, shall inspect the find within 24 hours of discovery and notify the County of their initial assessment. Indigenous archaeological materials might include: obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil (midden) containing heat-affected rocks, artifacts, or shellfish remains; stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include: building or structure footings and walls, and deposits of metal, glass, and/or ceramic refuse.

If the County determines, based on recommendations from a qualified archaeologist and a California Native American Tribe representative (if the resource is indigenous), that the resource may qualify as a historical resource (as defined in *CEQA Guidelines* Section 15064.5), a unique archaeological resource (as defined in PRC Section 21083.2[g]), or a tribal cultural resource (as defined in PRC Section 21080.3), the resource shall be avoided, if feasible. Consistent *with CEQA Guidelines* Section 15126.4(b)(3), this may be accomplished through: planning construction to avoid the resource; incorporating the resource within open space; capping and covering the resource; and/or deeding the site into a permanent conservation easement.

If avoidance is not feasible, the County shall consult with appropriate California Native American Tribes (if the resource is indigenous), and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2 and *CEQA Guidelines* Section 15126.4. This shall include documentation of the resource and may include data recovery (according to PRC Section 21083.2), if deemed appropriate, or other actions such as treating the resource with culturally appropriate dignity and protecting the cultural character and integrity of the resource (according to PRC Section 21084.3).

Monitoring CUL-1: Permit Sonoma Planning shall verify the above notes are printed on all related building and grading plans before granting permit issuance.

c. Disturb any human remains, including those interred outside of formal cemeteries?

Comment:
Through a records search, background research, and field surveys, no human remains have been observed or are known to exist in the project site. Therefore, the project is not anticipated to impact any human remains.

While unlikely, it is possible that human remains could be encountered during construction of the project. If any such resources were encountered and were damaged or disturbed as a result of the project, the impact would be potentially significant. This potentially significant impact would be reduced to a less-than-significant level with implementation of Mitigation Measure CUL-2.

Significance Level:
Less than significant with Mitigation

Mitigation

Mitigation CUL-2:
In the event of discovery or recognition of any human remains during construction activities, such activities within 100 feet of the find shall cease until the Sonoma County Coroner has been contacted to determine that no investigation of the cause of death is required. The California Native American Heritage Commission (NAHC) shall be contacted within 24 hours if it is determined that the remains are Native American. The NAHC will then identify the person or persons it believes to be the most likely descendant from the deceased Native American, who in turn would make recommendations to the lead agency for the appropriate means of treating the human remains and any grave goods. Per PRC Section 5097.98, the County shall ensure that the immediate vicinity of the location of the human remains is not damaged or disturbed by further development activity until the County has discussed and conferred with the most likely descendant regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.

Monitoring CUL-2: Permit Sonoma Planning shall verify the above notes are printed on all related building and grading plans before granting permit issuance.

6. ENERGY

As described in the General Plan 2020 EIR, average energy uses in Sonoma County consist primarily of petroleum, natural gas, and electricity. Sonoma County's main provider of electricity, PG&E, draws on a variety of state and local energy sources to feed its regional power grids, including geothermal, natural gas, hydroelectric, nuclear, and oil. Significant users of electricity within the county include the County General Services Department, the County Department of Transportation and Public Works, and the Sonoma County Water Agency.

Sonoma County has several existing programs related to energy conservation and efficiency: The Sonoma County Regional Climate Action Plan outlines state, regional, and local measures for unincorporated portions of Sonoma County to reduce emissions through the increased use of renewable energy, including in buildings as well as water and wastewater infrastructure.

Would the project:

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

Comment:
The General Plan 2020 EIR found that implementation of the plan at full buildout would result in a less-than-significant impact related to energy consumption from land use locations and patterns, due to reduced reliance on single occupancy vehicles. Implementation of the Plan was also determined to result in a less-than-significant impact related to energy consumption from building construction due

to the application of relevant General Plan policies. However, despite adherence to such policies, the operation of buildings implemented under the General Plan would result in a significant impact related to increased energy demand and need for additional energy resources.

The proposed project would not result in a significant impact related to energy beyond what was determined in the General Plan 2020 EIR. The project site is designated under the Diverse Agriculture land use designation, which permits the density of residential uses proposed by the project. General Plan Policies such as Policies LU-2a and LU-2b would help ensure that the proposed project is consistent with the land uses proposed under the General Plan. Additionally, the residential structures built as part of the proposed project would be subject to Titles 20 and 24 of the California Code of Regulations, which serve to reduce demand for electrical energy by implementing energy-efficient standards for residential and non-residential buildings.

The proposed project would be within the envelope of development considerations for the project site, as analyzed in the General Plan 2020 EIR. The proposed project would not conflict with the policies listed as well as others which would reduce energy consumption. For these reasons, impacts to energy from the proposed project would be less than significant.

Significance Level:
Less than Significant.

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

Comment:
See discussion in A) above.

Significance Level:
Less than Significant.

7. GEOLOGY AND SOILS:

The topography in Sonoma County is varied, including several mountain ranges, distinctive valleys, and coastal terraces. The geology is quite complex and is continually evolving because of its location at an active plate margin. The county is bounded on the south by the San Pablo Bay, the Mayacamas and Sonoma Mountains to the east, as well as the Cotati and Petaluma Valleys. The Pacific Ocean forms the western county boundary, including an assemblage of steep hills, marine terraces, beaches, and offshore sea stacks.

The project site is located in Bennett Valley, an area just southeast of the City of Santa Rosa. The project site is generally sloped, vacant, and undeveloped.

PJC & Associates prepared a Preliminary Geological Feasibility Study14 for the proposed project, as well as an Update to Geologic Reports.15 Both reports were utilized to complete the analysis of geologic conditions below.

Would the project:

Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

14 PJC & Associates, Inc. 2017. Preliminary Geological Feasibility Study, Proposed Residential Subdivision, 4700 Bennett Valley Road, Santa Rosa, California.

15 PJC & Associates, Inc. 2022. Update to Geologic Reports, Proposed Residential Subdivision, 4700 Bennett Valley Road, Santa Rosa, California.

d. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Comment

Seismic Activity and Ground Shaking: The project site is not located within an Alquist-Priolo Earthquake Fault Zone. However, an active trace of the Rodgers Creek fault and the Alquist-Priolo Earthquake Fault Studies Zone is mapped approximately 1,000 feet west of the southernmost property boundary. While no active faults are mapped at the site, the USGS has mapped a concealed trave of the Matanzas Creek Fault Zone within the northern portion of the project site as well as an unnamed fault trace that terminates at the contact between the Sonoma Volcanics Group and the landslide deposit that underlies the site. These fault traces have the potential to experience renewed movement during severe seismic events.

The proposed project site has been subjected in the past to ground shaking by earthquakes on the active fault systems that traverse the region. It is believed that earthquakes with significant ground shaking will occur in the region within the next several decades. Therefore, it must be assumed that the site will be subjected to strong ground shaking during implementation of the proposed project.

The proposed project would be constructed in compliance with all applicable development and engineering standards including current Uniform Building Code (UBC) and California Building Code (CBC) (Title 24 of California Code of Regulations) standards. Additionally, the proposed project would be subject to General Plan policies such as Policy PS-1g, which specifies a 50-foot building setback from any fault. With implementation of the existing regulatory framework that addresses earthquake safety issues, adherence to requirements of the UBC and CBC and various design standards, seismically induced ground-shaking and secondary effects would not be a potential hazard for the proposed project. Implementation of the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Therefore, there would be a less than significant impact.

Liquefaction: According to the Association of Bay Area Governments (ABAG), the proposed project site is located in an area which is considered to have very low liquefaction potential. The soils and bedrock encountered onsite during surface and subsurface exploration do not appear to be prone to liquefaction. Therefore, it is judged that the risk of liquefaction at the site is low, and the resulting impact would be less than significant.

The proposed project site is underlain by a large landslide complex. In addition, there are areas of active land sliding and soil creep within the project site. Though the proposed building envelopes have been adequately set back from the landslide deposits, as shown in Appendix A, an in-depth subsurface exploration which may include extensive earthwork is required to achieve acceptable slope stability. Until the subsurface exploration can be performed, and measures to achieve acceptable slope stability are determined, the impact remains potentially significant. Mitigation Measure GEO-1 would require the geotechnical analysis of development sites and the development and implementation of design recommendations based on the analysis of subsurface soils to minimize potential hazards due to landslide potential. With implementation of Mitigation Measure GEO-1, impacts related to landslides would be less than significant.

Significance Level:
Less than Significant with mitigation.

Mitigation Measures

Mitigation GEO-1: Prior to the granting of grading permits, the project applicant shall utilize a qualified specialist to conduct geotechnical analysis at each development site within the project footprint to determine the potential or geologic hazards. The scope of the geotechnical analysis must include the identification of structural design recommendations based on subsurface conditions. The

project applicant shall incorporate the recommendations of the geotechnical study into the project design, to the extent feasible.

Monitoring GEO-1: Permit Sonoma Planning shall confirm with Permit Sonoma Building and Plan Check staff verify the above notes are printed on all related building and grading plans before granting permit issuance. applicant shall incorporate the recommendations of the geotechnical study into the project design, to the extent feasible

e. Result in substantial soil erosion or the loss of topsoil?

Comment:
The proposed project would develop the 51-acre project site with three new residential units. Site preparation would be anticipated to include grading and excavation for the structural foundations and utility installation. The project would involve excavating, filling, moving, grading, and temporary stockpiling of soils onsite, all of which would expose site soils to erosion from wind and surface water runoff, thereby increase the potential of soils erosion. As described in the General Plan EIR, even with the implementation of erosion control measures, development on moderate slopes would be particularly susceptible to increased erosion and sedimentation. However, compliance with the existing county building and grading requirements and the Phase II NPDES permitting requirements, as well as with the county's grading and erosion control ordinance, would reduce construction-related erosion and sedimentation.

Further potential for soil expansion and/or subsidence would be minimized through adherence to the UBC, in accordance with General Plan Policy OSRC-11g. Compliance with this policy and adherence to the above requirements would minimize the potential for soils erosion as a result of the proposed project, and the potential impact would be less than significant.

Significance Level:
Less than Significant.

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

Comment:
The limited subsurface exploration which occurred onsite found potentially expansive soils mantling the entire project site. Further, it was determined that potentially expansive bedrock could be present at the project property. Where expansive soils and bedrock are present, the Update to Geologic Reports determined that geotechnical engineering strategies would reduce potential environmental impacts from unstable or expansive soils. A detailed geotechnical investigation, including further extensive subsurface exploration, soil and bedrock laboratory testing, and engineering analysis, would be required to provide specific geotechnical conclusions and recommendations, as would be conducted through implementation of Mitigation Measure GEO-1, the implementation of which would reduce

Significance Level:
Less than Significant with Mitigation

Mitigation:
Mitigation GEO-2: Implement Mitigation GEO-1

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

Comment:
See Comment 7.c

Significance Level:
Less than Significant with Mitigation

Mitigation:
Mitigation GEO-3: Implement Mitigation & Monitoring GEO-1

h. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?

Comment:
The proposed project would develop septic systems for each of the four lots, as there is no sewer system available in this area of the County. The suitability of soils for the support of septic systems has not been identified. However, existing homes on adjacent properties currently operate with the use of septic systems. The implementation of Mitigation Measure GEO-1 would include the development of a geotechnical study that would identify the suitability of soils for the placement of septic systems in the project site and provide applicable design recommendations. With implementation Mitigation Measure BIO-1, impacts related to the adequacy of soils of the support of septic tanks for alternative waste water disposal systems would be less than significant.

Significance Level:
Less than Significant with Mitigation

Mitigation:
Mitigation GEO-4: Implement Mitigation & Monitoring GEO-1 and BIO-1

i. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Comment:
The project site is not considered sensitive for paleontological resources. Further the project site is not located on fossil bearing soils or rock formations below the ground surface and the potential for the presence of subsurface paleontological resources is very low.

However, ground disturbing activities, particularly grading may reveal paleontological resources not previously identified. Should any paleontological resources be discovered during project construction, implementation of Mitigation Measure CUL-2 would reduce potential impacts to paleontological resources to less than significant.

Significance Level:
Less than Significant with Mitigation

Mitigation:
Mitigation GEO-5: Implement Mitigation & Monitoring CUL-2.

8. GREENHOUSE GAS EMISSIONS:

Since the General Plan EIR was adopted, California's lawmakers recognized the need to analyze greenhouse gas emissions as a part of the CEQA process. SB 97 required OPR to develop, and the California Natural Resources Agency to adopt, amendments to the CEQA Guidelines addressing the analysis and mitigation of greenhouse gas emissions. In late 2018, the Agency finalized amendments to the CEQA Guidelines, including changes to CEQA Guidelines section 15064.4, which addresses the analysis of greenhouse gas emissions. Accordingly, impacts from the proposed project related to greenhouse gas emissions are analyzed below.

The General Plan EIR describes that a 2002 study of the greenhouse gas emissions from Sonoma County governmental operations revealed that building use contributed to 40.9 percent of total emissions, employee commute contributed 38.3 percent, fleet vehicles 20.3 percent, and water and sewer use 0.5 percent.

Would the project:

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

Comment:
The proposed project would not conflict with or otherwise interfere with the statewide greenhouse gas reduction measures identified in CARB's Scoping Plan. For example, the proposed residences would be constructed in conformance with current CALGreen requirements and the Title 24 Building Code, which requires high-efficiency water fixtures and water-efficient irrigation systems. The project is under the DA B6 10/5 (Ac/DU)/Ac MIN, SR zoning designation, within which the density is 10 acres per unit with a minimum lot size of 5 acres for purposes of subdivisions and is therefore consistent with the DA 10 land use classification of the General Plan. The project would be developed in accordance with the land use density anticipated onsite under the General Plan. Project-related greenhouse gas emissions from both construction and operation would not create a significant impact on the environment, due to the size of the project as well as its adherence to applicable regulations. Impacts to greenhouse gas emissions from the proposed project would be **l**ess than significant.

Significance Level:
Less than Significant

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

Comment:
see discussion in a) above.

Significance Level:
Less than Significant

9. HAZARDS AND HAZARDOUS MATERIALS:

As stated in the General Plan EIR, the Sonoma County Department of Emergency Services (DES) defines a hazardous material as a:

> *Substance or combination of substances which because of quantity, concentration, physical, chemical, radiological, explosive, or infectious characteristics, poses a potential danger to humas or their environment. Generally, such materials are classed as explosives and blasting agents, flammable and nonflammable gasses, combustible liquids and solids, oxidizers, poisons, disease-causing agents, radioactive materials, corrosive materials, and other materials including hazardous wastes.*

Hazardous materials are used throughout Sonoma County in various agricultural, industrial, commercial, medical, research, and household settings. Numerous federal and State laws, as well as local policies and plans, control the production, transportation, storage, and use of these hazardous materials and their waste products.

The 51-acre site is mostly vacant and is largely undeveloped. A search of the State Water Resources Control Board (SWRCB) GeoTracker and Department of Toxic Substances Control (DTSC) EnviroStor databases indicates that there are no known hazardous materials sites within the project site. [16,17]

Would the project:

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

Comment:
The project site does not indicate any known hazards site conditions. As discussed above, the State Water Resources Control Board (SWRCB) GeoTracker and Department of Toxic Substances Control (DTSC) EnviroStor databases indicate that there are no known hazardous materials sites within the project site. The GeoTracker and EnviroStor databases also indicate that there are no known Cleanup Program Sites and Leaking Underground Storage Tanks (LUSTs) and there is no indication that activities proposed for the project would encounter any contaminated soil or groundwater during construction.

Use of construction materials and equipment to prepare the site and construct the proposed residential homes and associated infrastructure would require the use of hazardous materials. Construction materials such as fuels, oils and lubricants, solvents and cleaners, glues and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures are all commonly used in construction. Storage of hazardous materials or chemicals in large quantities is not generally associated with residential development. The routine use or an accidental spill of hazardous materials during construction could result in exposures or inadvertent releases, which could adversely affect construction workers, the public, and the environment.

However small the potential, construction activities would be required to comply with the numerous federal, State, and local hazardous materials regulations. These regulations are designed to ensure that hazardous materials are transported, used, stored, and disposed of in a safe and legal manner to protect construction workers' safety. These regulations are also intended to reduce the potential for a release of construction-related fuels or other hazardous materials into the environment, including stormwater and downstream receiving water bodies.

Based on these regulations, including Sonoma County General Plan 2020 policies and County Code Chapter 29 (Hazardous Materials Management), hazardous materials storage facilities will be inspected every three years and a compliance report will be prepared for every inspection. In addition, the California Fire Code would require measures for the safe storage and handling of hazardous materials.

Compliance with those regulations would render the impact of hazardous materials risks related to construction and operation of the proposed project less than significant.

As discussed in, Section 2.7, *Geology and Soils*, above, construction contractors would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) for construction activities in compliance with requirements of the National Pollutant Discharge Elimination System's (NPDES) General Construction Permit. The SWPPP would list the hazardous materials (including petroleum products) proposed for use during construction; describe spill prevention measures, equipment inspections, and

[16] California State Water Resources Control Board, 2021. GeoTracker Database. Available: https://geotracker.waterboards.ca.gov/map/?myaddress=California&from=header&cqid=9544721305. Accessed October 10, 2023.

[17] U.S. Department of Toxic Substances Control, 2022. EnviroStor Database. California Department of Toxic Substances Control. DTSC's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List). Available: https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29. Accessed October 10, 2023.

equipment and fuel storage; protocols for responding immediately to spills; and describe best management practices (BMPs) for controlling site run-on and runoff.

Additionally, the transportation of hazardous materials would be regulated by the Department of Transportation (DOT), California Department of Transportation (Caltrans), and the California Highway Patrol (CHP). Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of an accidental release. In the event of a spill that releases hazardous materials, a coordinated response would occur at the federal, state, and local levels, including the City of Santa Rosa whose Fire Department is the local hazardous materials response team. In the event of a hazardous materials spill, the Santa Rosa Fire Department would be notified simultaneously and sent to the scene to assess and respond to the situation.

The required compliance with the numerous existing laws and regulations discussed above that govern the transportation, use, handling, and disposal of hazardous materials would limit the potential for creation of hazardous conditions from the use or accidental release of hazardous materials. Compliance with these regulations also minimizes the potential of hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment to a less-than-significant level.

Significance Level:
Less than Significant

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

Comment:
See Comment a. above.

Significance Level:
Less than Significant

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

Comment:
The project site is near a residential neighborhood with four schools, namely; 1) Yulupa Elementary School approximately 1 mile northwest, 2) Strawberry Elementary School approximately 1.3 miles north, 3) Manzanita Elementary School approximately 1.6 miles to the north, and 4) Village Elementary School approximately 2.2 miles north of the project site. No schools are within 0.25-mile of the project site.

Implementation of the proposed project would not involve hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste as it is a residential community. The proposed project is residential uses; as such, storage of hazardous materials or chemicals in large quantities is not generally associated with residential development.

However, the construction of these residences, roadways, landscaping, utilities and infrastructure involves the use of construction equipment, staging, use of building materials, overhauling of dirt and debris. As such, there is potential for accidental leak or accidental exposure to hazardous materials during construction.

The project is subject to Sonoma County's *Hazardous Waste Management Plan*, adopted in 1989.

The HWMP contains goals, policies, and recommended programs for the management, recycling, and disposal of hazardous wastes. It serves as the implementation program for management of hazardous waste in order to protect the health, safety, and property of residents.

Compliance with those regulations would render the impact of hazardous materials risks related to construction and operation of the proposed project less than significant. No mitigation measures would be required

Significance Level:
Less than Significant

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

Comment:
As discussed above for a) and b), the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (also referred to as the "Cortese List"). Therefore, the proposed project would not create a significant hazard to the public or the environment on account of being located on a hazardous materials site. There would be no impact under this criterion.

Significance Level:
No Impact

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

Comment:
The nearest airport is the Petaluma Municipal Airport, approximately 11 miles south of the project site. According to the Comprehensive Airport Land Use Plan for the Petaluma Municipal Airport,[18] the project site is not within the delineated airport safety zones or noise contours. The proposed project would not result in a safety hazard or excessive noise for people residing in the area, and there would be no impact.

Significance Level:
No Impact

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Comment:
Sonoma County has adopted an *Emergency Operations Plan* (EOP) that provides procedures to be followed in fire response and flood response. The Sonoma County Fire District provides full-time fire prevention staff to plan check development permits.

Construction activities for large projects would likely cause land closures or may restrict travel on county roadways for temporary periods of time. It is not anticipated that implementation of the proposed project would cause similar level of temporary closures. Additionally, the General Plan EIR did not identify Bennett Valley Road as a major roadway within the county that would experience severe congestion and therefore contribute to the significant impact related to congestion on local county roadway segments. The proposed development would not require substantial or permanent road closures which might affect implementation of an emergency response or evacuation plan, the

[18] Sonoma County. *Comprehensive Airport Land Use Plan*. Available: https://permitsonoma.org/longrangeplans/adoptedlong-rangeplans/airportlanduseplan.

proposed project impact would remain less than significant. No mitigation measures would be required.

Significance Level:
Less than Significant

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

Comment:
The project site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ)[19] as mapped by the California Department of Forestry and Fire Protection (CAL FIRE). As directed by Government Code 51175-89, the CAL FIRE identifies areas of very high fire hazard severity zones within Local Responsibility Areas (LRA). The project site is located within Santa Rosa Fire Department's service area.

Construction activities occurring during the dry season have the potential to create sparks that could ignite dry grasses and weeds in the project area or on the project site. However, this risk is similar to that found at other construction sites in the county, and ongoing vegetation management practices would ensure that wildland fires would be unlikely to occur.

The proposed project would develop the project site with residential uses and would be subject to similar conditions for which vegetation management practices would remain applicable and effective in minimizing the potential fire hazards from construction. For this reason, the impact of the proposed project with respect to fire hazards would remain less than significant.

Significance Level:
Less than Significant

10. HYDROLOGY AND WATER QUALITY:

Environmental Setting
The proposed project site is located within the Santa Rosa Creek Subbasin watershed. This subbasin drains an area of approximately 81 square miles, with elevations ranging from approximately 2,000 feet MSL along the easternmost boundary of the subbasin to roughly 100 feet MSL near the westernmost boundary. Major streams and tributaries in the subbasin include Santa Rosa Creek, Spring Creek, Brush Creek, Matanzas Creek, Colgan Creek, and Rincon Creek.

Bennett Valley is located approximately three miles south of Santa Rosa. The area is located within the Napa – Sonoma Volcanics Groundwater Basin but contains an alluvial aquifer. Development that uses this groundwater causes limited availability of water in this area. To address groundwater basin issues, the Sonoma County Board of Supervisors directed County staff to work with the USGS, the SCWA, and other local stakeholders to develop a cooperative study work program to systematically evaluate groundwater resources within the county's major groundwater basins.

Discussion
A Hydrologic Evaluation of Upland Wetlands[20] was prepared by O'Connor Environmental, Inc. to characterize the hydrologic factors onsite. The Evaluation is used to supplement the analysis below.

[19] California Department of Forestry and Fire Protection, 2023. Available: https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/#explorefhsz. Accessed September 11, 2023.

[20] O'Connor Environmental, Inc. 2021. Hydrologic Evaluation of Upland Wetlands – 4700 Bennett Valley Road.

Would the project:

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

Comment:
As described in the General Plan EIR, even with the implementation of erosion control measures, development on moderate slopes would be particularly susceptible to increased erosion and sedimentation which has the potential to impair water quality. However, compliance with the existing county building and grading requirements and the Phase II NPDES permitting requirements, as well as with the county's grading and erosion control ordinance, would reduce construction-related erosion and sedimentation. Potential water quality impacts from the proposed project from construction would be reduced through adherence to General Plan policies such as Policies WR-1g and WR-1h, which would call for minimizing sediment deposition and other pollutants into drainage systems and encourage the adoption of stricter grading standards to avoid sedimentation. The project would not substantially degrade surface or groundwater quality, and the impact would be less than significant.

Significance Level:
Less than Significant

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

Comment:
The General Plan EIR identified a significant and unavoidable impact related to groundwater level decline, as land uses and development consistent with the General Plan would increase demand on groundwater supplies. The proposed project site contains an existing well in the Designated Remainder Lot. While the project would utilize groundwater resources, the project itself would not impede sustainable groundwater management of the Napa – Sonoma Volcanics Groundwater Basin. The project would comply with General Plan Policy WR-2c, which would instill new requirements for all permits to drill, replace, deepen, or repair wells. It would also require monitoring of all future wells to report water levels, flow direction, and water quality. Where applicable, actions performed under this policy would be consistent with the adopted groundwater management plan, which is the Groundwater Sustainability Plan for the Sonoma Valley Groundwater Subbasin. The impact would thus be less than significant.

Significance Level:
Less than significant

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river including 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 offsite;**
- **iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**
- **iv. Impede or redirect flood flows?**

Comment (1-4)
The evaluation found that existing wetlands on Lot 3 are contributed to by runoff from hills to the west of the property, and though much of this water is diverted away from the wetlands via an unpaved road, there is a culvert which drains the hillside under the road and towards the wetlands. A previously plugged culvert which caused excess runoff and drainage to the building

envelope on Lot 3 has been corrected, and measures have been taken to ensure that further plugging does not occur. As described in the Hydrologic Evaluation, this action will eliminate or significantly reduce the source of runoff and drainage on Lot 3.

Low Impact Development Standards and required stormwater attenuation facilities should largely address any issues related to drainage, as well as flow management measures such as a flow spreader or a gravel trench upslope from the wetlands on Lot 3 which may reduce high-volume, high-velocity storm flows and promote infiltration of runoff.

Additionally, the proposed project would be required to comply with General Plan policies such as Policy WR-1c, which would work towards the development and implementation of new stormwater management regulations applicable to new development and redevelopment of unincorporated areas. The project would not substantially alter the existing drainage pattern of the project area in a manner which would cause issues related to runoff. The impact would be less than significant.

Significance Level:
Less than Significant

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

Comment:
The project site is located along a hillside, in an area that is not susceptible to flood hazards. FEMA's National Flood Hazard Layer (NFHL) Viewer indicates that the proposed project site is not located within an area prone to flooding. Therefore, the project would not risk release of pollutants due to project inundation, and there would be no impact related to flood hazards.

Significance Level:
No Impact

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

Comment:
See Comment 10.b

Significance Level:
Less than Significant Impact

11. LAND USE AND PLANNING:

The project site is located on an approximately 51-acre site consisting of one parcel, APN 049-170-037. The project site is under the Diverse Agriculture (DA 10) General Plan Land Use designation, which allows for a residential development density of 10 acres per unit, and permits a range of housing types, including single-family dwelling.21 The project site is under the DA B6 10/5 (Ac/DU)/Ac MIN, SR zoning designation, within which the density is 10 acres per unit with a minimum lot size of 5 acres for purposes of subdivisions, and is therefore consistent with the DA 10 land use classification of the General Plan.

The site is surrounded by Bennett Valley Cemetery as well as Galvin Community Park to the northeast, residential uses to the north, and forested open space as well as residential uses to the south and west. The project area is located within a part of Sonoma County that has remained rural despite the development of nearby residential neighborhoods in the mid-to-late-20th century.

[21] Sonoma County, California, 2023. *Code of Ordinances.*

Would the project:

a. Physically divide an established community?

Comment:
Implementation of the proposed project would not result in the physical division of any established community. While the Designated Remainder lot within the project site contains an existing residence, and there are residences in the project vicinity, there is no established community which contains the project site. Further, the project would develop residences which would be cohesive with residential uses which already exist in the project area. The impact would be less than significant.

Significance Level:
Less than Significant

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

Comment:
The proposed project would not conflict with any existing land use plan, policy, or regulation which governs the project site. For example, Sonoma County General Plan 2020 Policies LU-2a and LU-2b would ensure growth is consistent with the General Plan and would balance residential holding capacity with projected growth, considering denial of land use amendments which add residential density in rural areas if the residential capacity exceeds projected growth. Implementation of the proposed project would comply with the described land use and zoning designations for the site and would therefore not exceed projected growth for the area. The impact would be less than significant.

Significance Level:
Less than Significant

12. MINERAL RESOURCES:

Sonoma County has many mineral resources that have been valuable enough to justify commercial extraction and processing. Historic activities, including mercury, chromite, and copper mining, have had long-term impacts on downstream soils and water quality. Sand, gravel, crushed rock, and building stone are considered the most valuable mineral resources in the county with 3.9 million tons of such materials mined in 2003.

Mineral Resource Zones (MRZs) are categorized by geologic factors into four broad classifications (MRZ-1 through MRZ-4). MRZ-1 Zones are areas where adequate information indicates that no significant mineral deposits are present, or where little likelihood exists for their presence. MRZ-2 Zones are areas where adequate information indicates that significant mineral deposits are present, or where there is a high likelihood that their presence exists. MRZ-3 Zones contain mineral deposits for which the significance cannot be evaluated from available data. MRZ-4 Zones are areas where available information is inadequate.

Would the project:

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

Comment:
The California Department of Conservation Division of Mines and Geology determined that the Bennett Valley area does not contain any significant Mineral Resource Zones as described above. As there are no known mineral resources located on the proposed project site, no impact to known

mineral resources of regional or state-wide would value result from implementation of the proposed project.[22]

Significance Level:
No Impact

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

Comment:
The Sonoma County General Plan 2020 EIR determined that impacts to mineral resources resulting from implementation of the General Plan would be less than significant. Specifically, to avoid incompatible land uses adjacent to potential mineral resource extraction areas, General Plan Policy OSRC-13c requires the review of projects which are on or near sites with designated Mineral Resources in the *Aggregate Resources Management Plan* for compatibility with future mineral extraction. The proposed project would adhere to this policy in ensuring that the project site is not incompatible with any surrounding uses.

Significance Level
No impact.

As the proposed project vicinity is not classified as an MRZ, indicating a lack of the presence or likelihood of significant mineral deposits, the proposed project would result in no impact related to the loss of availability of a locally important mineral resource recovery site.

13. NOISE:

As described in the General Plan EIR, the following constitute noise-sensitive land uses which should be considered in the analysis of noise impacts:

- All residential uses,
- Schools,
- Long-term care medical facilities, such as hospitals, nursing homes, etc.,
- Churches, and
- Libraries.

The proposed project site, located at 4700 Bennett Valley Road in Sonoma County just outside Santa Rosa, is located in a rural residential area designated as Diverse Agriculture (DA 10) under the General Plan. The site is surrounded by Bennett Valley Cemetery and Galvin Community Park to the northeast, single family residential uses to the north, and forested open space as well as some residential uses to the south and west. The nearest residential uses are located at 4728 Bennett Valley Road, directly east of the project site, and 4716 Bennett Valley Road, directly west.

The Sonoma County General Plan 2020 EIR identified significant and unavoidable impacts related to increased traffic noise and increased rail noise and found less-than-significant impacts related to roadway noise on noise-sensitive development, stationary noise sources on noise-sensitive development, and excessive noise levels from proximity to an airport land use plan area. Relevant topics as they pertain to the proposed project are discussed in depth below.

Would the project:

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

[22] California Department of Conservation Division of Mines and Geology. 1983. *Mineral Resource Zones and Resource Sectors, Napa and Western Solano Counties. Special Report 146, Plate 3.2.*

Comment:
The General Plan EIR concluded that there would be less-than-significant impacts from stationary noise sources resulting from implementation of the General Plan. The proposed project fits within the land use that was proposed for the project area and was therefore considered in the analysis contained in the General Plan EIR. Further, the project would comply with Policy NE-1c, which would control non-transportation related noise from new projects through adherence to applicable noise standards as outlined in Table NE-2 of the General Plan. Regarding temporary construction noise, the proposed project would require standard construction activities and noise impacts that would be similar to those assumed in the General Plan EIR.

Significance Level:
Less than Significant

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

Comment:
The proposed project would require standard construction activities that would not result in abnormal amounts of groundborne vibration. Vibration resulting from project construction would not be substantially different from anticipated vibration impacts from construction activities in the project area and potentially on the proposed project site anticipated to occur pursuant to implementation of the General Plan 2020. The impact would be less than significant.

Significance Level:
Less than Significant

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

Comment:
The General Plan EIR found that air operations at Sonoma County Airports consistent with levels projected by the General Plan 2020 Air Transportation Element could result in increased noise levels to surrounding areas including residential land uses. However, policies and programs contained in the Noise and Air Transportation Elements would reduce this potential impact to be less than significant. These policies include AT-3b, AT-3c, and AT-3d, which would regulate the single event noise levels produced by aircraft operating at Sonoma County Airport, Policy AT-3c, which would limit annoyance and sleep disturbance in residential areas where aircraft over flights occur, and others. The proposed project would be consistent with the findings of the General Plan EIR related to airport noise. The project is located approximately 10 miles southeast of Sonoma County Airport and is not located within proximity to an airport land use plan area. The proposed project would not expose its residents to excessive noise levels from an airport, and the impact would be less than significant.

Significance Level:
Less than Significant

14. POPULATION AND HOUSING:

The Sonoma County General Plan 2020 EIR projected that the unincorporated area of Sonoma County would have a total population 546,030 by 2020, which would represent 27 percent of the total population of the county. This population growth within the unincorporated portion of Sonoma County would be consistent with ABAG's regional projections. Further, substantial population growth would not occur within the unincorporated portion of the county as a result of proposed Land Use Amendments contained in the General Plan.

Although the proposed project site is mostly vacant and undeveloped, its zoning and land use designation allow for residential development as part of the General Plan 2020 build-out projections for provision of housing units.

Would the project:

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

Comment:
Under the proposed project, three new residential units would be developed across approximately 51 acres of undeveloped land, resulting in a direct increase in population. The project site is currently designated as Diverse Agriculture (DA 10), with an allowable density of 10 acres per unit with a minimum lot size of 5 acres for purposes of subdivisions. The site is currently zoned as DA B6 10/5 (Ac/DU)/Ac MIN, SR, which allows for the residential use proposed as part of the project.

Using an average estimated household factor of 2.5623 for the Sonoma County, implementation of the proposed project would result in an anticipated introduction of approximately eight residents to the proposed project site. While this result would represent an increase to population in the project vicinity, it would be a negligible change amongst the existing rural residential uses.

The proposed project would be consistent with General Plan goals and policies within the Land Use Element which would accommodate the major share of future growth within select unincorporated communities which are planned to have adequate water and utility capacities. The negligible increase in population at the project site would be consistent with the site's land use and zoning designation, and the impact would be less than significant.

Significance Level:
Less than Significant

b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

Comment:
The proposed project site is largely vacant and undeveloped; as such, the proposed project would not displace existing residents or housing that would necessitate the construction of replacement housing elsewhere. The project would therefore not result in an impact which would displace existing residents or housing.

Significance Level:
No Impact

15. PUBLIC SERVICES:

The proposed Project site is currently vacant and undeveloped but is located near existing residential, hotel, and commercial uses. The site is bordered by Bennett Valley Cemetery as well as Galvin Community Park to the northeast, residential uses to the north, and forested open space as well as some residential uses to the south and west. Residential uses which would be introduced to the Project vicinity through implementation of the proposed Project would generate increased demand for public services which serve the area, such as fire protection, police protection, and school services. Consideration of the demand for parks and recreational facilities is discussed in detail under Section 2.16, "Recreation." \

[23] U.S. Census Bureau, 2023. Quick Facts – Sonoma County, California. Available: https://www.census.gov/quickfacts/fact/table/sonomacountycalifornia/PST045222. Accessed September 12, 2023.

Overall, the project proposes a four-unit residential subdivision which would subdivide the existing 51-acre property into four new parcels, for a total of eight buildings. As the project site is zoned for residential uses, an increase in population within the site area is previously planned and accounted for.

Would the project:

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

   a. Fire protection?

   Comment:
   The Sonoma County Fire District updated its Strategic Plan 2020-2023 in June of 2021.24 The Plan is aimed at providing organizational success through the consideration of factors such as staffing and budget. Fire protection and prevention services to the proposed Project site would be provided by the Sonoma County Fire District (SCFD). The District is comprised of Bennett Valley, Mountain Volunteer, Rincon Valley, Windsor, Russian River, Forestville, and the Bodega Bay Fire Protection Districts. SCFD provides service to approximately 100,000 residents over 250 square miles through the operation of 11 stations.25

   The Sonoma County General Plan 2020 includes policies in both the Public Safety and Public Services and Facilities Elements that would provide funding and reduce some of the demand for new or expanded fire and emergency services facilities. Specifically, Policies PF-2a and PF-2b require that fire and emergency services be planned, designed, and constructed in accordance with projected growth and coordinated with that of Sonoma County. Policy PF-2n would deny the approval of discretionary projects if fire and emergency services are not sufficiently available. Residential Use, Commercial Use, and Industrial Use policies such as LU-2a, LU-3c, LU-3d, LU-5b, LU-5d, and LU-6a would reduce the need for additional fire protection and emergency services facilities by maintaining low residential densities outside of the USAs.

   While these and other policies and programs of the General Plan would likely reduce many of the environmental impacts associated with the construction or expansion of fire protection and emergency services facilities, the General Plan 2020 EIR concluded in a significant impact related to fire protection services due to the speculative nature of future facility expansion.

   The proposed project, however, would not represent a significant contribution to the increased demand for fire protection facilities. Currently, SCFD has 20 firefighters, seven firefighter/paramedics, 18 engineers, and 18 captains that report to three battalion chiefs on three different shifts. There are two divisions chiefs—training and safety and fire prevention. Together, this structure makes up three fully staffed shifts. The proposed project would only introduce four residential units and would be within SCFD's current service area. The resulting increase in demand for fire protection facilities would be less than significant.

   Significance Level:
   Less than Significant

   b. Police?

24 Sonoma County Fire District. 2021. "Strategic Plan 2020-2023." Available: https://www.sonomacountyfd.org/files/3cbc56f07/SCFD+Strategic+Plan+-+2020-2023+June+2021.pdf. Accessed September 13, 2023.

25 Sonoma County Fire District. 2023. "About Us." Available: https://www.sonomacountyfd.org/about-us. Accessed September 12, 2023.

Comment:
Since 1850, the Sonoma County Sheriff's Office has been providing law enforcement, court security services, and detention services to the people of Sonoma County. The Sheriff's Office is comprised of over 650 employees and approximately 100 volunteers. Servicing a county of over 1,600 square miles and population of over 500,000 people, the Sheriff's Office is responsible for primary law enforcement services of the unincorporated area, the Town of Windsor, and the City of Sonoma.26

The project site would be served by the Sonoma County Sheriff's Office, whose main office is located approximately five miles northwest of the project site. The project will involve the construction of three new residential units, introducing approximately eight new residents to the project area. The increase in population will contribute to an increase in the demand for police protection services provided by the Sherri's Office and could subsequently result in the need for additional or expanded law enforcement facilities and staff. However, the eight new residents introduced by the project would not be a significant enough amount to impact the preferred service ratio of 1.19 deputies per 1,000 residents. There would be no need for the construction of new facilities, and the resulting environmental impact would be less than significant.

Significance Level:
Less than Significant

c. Schools?

Comment:
The proposed project site falls within the Bennett Valley Unified School District (BVUSD). The BVUSD operates two schools: Yulupa (TK-3rd grade) and Strawberry (4th-6th grade). The nearest middle school to the project site is Spring Lake Middle School, operated within the Rincon Valley Unified School District and located approximately two miles north of the project site. The nearest high school to the project site is Montgomery High School, operated within the Santa Rosa City School District and located approximately two miles northwest of the project site.

The project would introduce approximately eight residents to the project area, and any school-age children living on the project site would be served by the BVUSD, RVUSD, and SRCSD, and could attend schools located within the Districts' boundaries. The schools located nearest to the project site are Yulupa and Strawberry schools.

Although the potential increase in students anticipated under the project would result in an increased demand upon school facilities and resources, the relatively small contribution of the student population which would result from the project is unlikely to add a substantial number of school-age children within the BVUSD. The project is therefore unlikely to result in an increased demand such that the construction or expansion of school facilities would be required.

Furthermore, the project applicant will be required to pay school impact fees to be allocated to the BVUSD, RVUSD, and SRCSD. Although school impact fees are often insufficient to completely fund the construction and operation of new school facilities, the California State Legislature has deemed such fees complete and adequate mitigation under CEQA, pursuant to SB 50 and AB 1600.

Should construction or expansion of new school facilities be required, consistency with Policy PF-2k of the General Plan would further reduce the potential environmental effects resulting from such facilities modifications. This mitigating policy would assist school districts in estimating the amount, rate and location of projected population growth within their attendance areas. Compliance with this policy would reduce any potential environmental impacts to less than significant.

26 Sonoma County Sheriff's Office. 2020. "Sonoma County Sheriff's Office." Available: https://www.sonomasheriff.org/. Accessed September 12, 2023.

Significance Level:
Less than Significant

d. Parks?

Comment:
Sonoma County contains 58 regional parks and trails from Petaluma to Gualala and Sonoma to Bodega Bay.27 Many offer wild landscapes and extensive trails, while others feature sports fields, playgrounds, and campgrounds. The proposed project would add residential units to the County, which would increase demand for park facilities and services, to serve proposed residents. However, the project would result in a negligible increase in population which would not be substantive enough to require the development of new park facilities or renovation of existing park facilities. For this reason, the proposed project would have a less than significant impact related to parks services.

Significance Level:
Less than Significant

e. Other public facilities?

Comment:
As discussed above, while implementation of the proposed project may result in increased demand for fire protection, police protection, education, recreational, and library services, the environmental impacts resulting from the need for new or expanded facilities in these sectors, and public services as a whole, would be less than significant. The library located closest to the proposed Project site is the Central Santa Rosa Library. The Central Santa Rosa Library has a number of facilities, including 23 one-hour internet computers, one printer, and two copy machines.28 These facilities would not exceed capacity from the introduction of approximately eight people. Therefore, impacts to library services would be less than significant.

Significance Level:
Less than Significant

16. RECREATION:

Within Sonoma County, there are two State Park Districts, the United States Army Corps of Engineers Lake Sonoma Recreation Area, the County Regional Park System, the parks and recreation departments of five cities, and three special park districts that together provide a variety of parklands serving both residents and visitors. In addition, there are a handful of facilities operated by private nonprofit organizations.

The project site is mostly vacant and undeveloped. At present, there are no neighborhood, local, or regional parks or bikeways existing on the site. In the near vicinity of the project area, Galvin Community Park lies directly across from the project site along Bennett Valley Road. This 23-acre park is operated by the City of Santa Rosa. Additionally, Matanzas Park, Doyle Community Park, Martin Luther King Jr. Memorial Park, and Colgan Creek Park are each located within approximately 2.3 miles of the project site and are operated by the City of Santa Rosa.

Would the project:

27 Sonoma County Regional Parks, 2023. “About Us.” Available: https://parks.sonomacounty.ca.gov/learn/about-us. Accessed September 12, 2023.

28 Sonoma County Library, 2023. Central Santa Rosa Library. Available: https://sonomalibrary.org/visit/locations/central.

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

Comment:
The proposed project would not cause or accelerate substantial physical deterioration of existing area parks or recreational facilities. The project anticipates the development of a four-unit residential subdivision with an estimated population increase of about 20 residents.

The Sonoma County General Plan 2020 EIR describes park acreage service level goals of five acres per 1,000 persons for community and neighborhood parks as well as Regional Recreation Areas and Open Space Parks. As described previously, the project would be served by regional, neighborhood, and community parks. Though the General Plan EIR identified a significant impact relating to increased demand for parks and recreation resulting from implementation of the General Plan, the proposed project would not significantly contribute to the use of existing facilities such that physical deterioration would occur.

Given the variety of park options available within the vicinity of the Project site, the Project would not represent an increase in population which would exceed Sonoma County park acreage service level goals.

Accordingly, the project is unlikely to increase the use of existing area parks or recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. Therefore, impacts to existing parks and recreational facilities would be less than significant.

Significance Level:
Less than Significant

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

Comment:
The project will add roughly 20 additional people to the local community and does not generate a level of increased demand that necessitates construction or expansion of recreational facilities that might otherwise have an adverse physical effect on the environment.

Significance Level:
Less than Significant

17. TRANSPORTATION:

The project site is located in Sonoma County just southeast of Santa Rosa, along Bennett Valley Road. The project proposes to construct a four-unit residential subdivision on the vacant project site. The project is expected to access the surrounding roadway network via the project's primary access point through the driveway along Bennett Valley Road.

Would the project:

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

Comment:
The proposed project, which would be consistent with the land use anticipated under the General Plan, would adhere to relevant policies and ordinances pertaining to the circulation system. The project would not include any roadway modifications or project elements which could be inconsistent with development proposed under the General Plan. Additionally, no impacts to the

existing bicycle, pedestrian, or transit network would occur as a result of project implementation. The impact would be less than significant.

Significance Level:
Less than Significant

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Comment:
The Sonoma County Transportation Authority (SCTA) has developed a model that estimates traffic and VMT characteristics in specific areas of development within the County, known as Traffic Analysis Zones (TAZs). The proposed project would be located in TAZ 105.29 The SCTA model estimates the residential VMT per capita in this TAZ to be 19.6 miles per day.30 As the proposed project is estimated to have a residential VMT per capita of 12.6 miles per day as the total project VMT is estimated to be 101 miles per day serving a population of eight, the impact related to VMT would be less than surrounding uses in the TAZ and would therefore be less than significant. See Appendix B.

Significance Level:
Less than Significant

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

Comment:
The proposed project would not introduce a geometrical or other design feature that would increase or substantially increase hazards related to roadway geometrics. The project would extend driveways off of existing driveways and would not include improvements to Bennett Valley Road or County right of way. Therefore, there would be no impact.

Significance Level:
No Impact

d. Result in inadequate emergency access?

Comment:
The proposed project is designed to have one primary entrance from the proposed driveway off Bennett Valley Road. The site plan has been designed to accommodate fire engine turning radii and allow for emergency access to each of the proposed residences. The proposed project would have adequate emergency access to and through the project site and would not impede emergency access on adjacent roadways. Therefore, the impact to emergency access is **l**ess than significant.

Significance Level:
Less than Significant

18. TRIBAL CULTURAL RESOURCES:

See Section 2.5, *Cultural Resources*, for a summary of records search, background research, and field identification efforts for cultural resources, which informs the tribal cultural resources analysis.

[29] Sonoma County Travel Model. 2020. SCTM 2020 TAZs. Available: https://www.arcgis.com/home/webmap/viewer.html?webmap=2aa1f84fb5cd4fb286deb5e1edab0e39&extent=-122.7951,38.4196,-122.569,38.5239.

[30] Fehr and Peers. 2019. VMT+ Providing VMT Per Capita Estimates Across California. Available: https://www.fehrandpeers.com/project/find-my-vmt/.

The *Bitakomtara* was the Southern Pomo tribelet in the Santa Rosa area. The *Bitakomtara* area encompassed approximately 150–200 square miles, bound on the north by Mark West Creek, the east by the Mayacamas Mountains and Sonoma Mountain, the south by the southern extent of the Russian River watershed (just north of Cotati), and the west by the Laguna de Santa Rosa. Obsidian was obtained at Annadel Mountain, approximately 2 miles east of the project site. Seasonal trips to Bodega and the mouth of the Russian River were made to obtain clams and other seafood. The tribelet consisted of three villages: *Wilok* (head of Santa Rosa Creek [approximately 6 miles northeast of the project site]), *Kabetciuwa* (eastern Santa Rosa, along the south bank of Santa Rosa Creek [approximately 2.5 miles north of the project site]), and *Hukabetyawi* (immediately west of downtown Santa Rosa [approximately 3.5 miles northwest of the project site) 3132.

Native American Correspondence

In November 2015 and February 2022, Tom Origer & Associates contacted the California Native American Heritage Commission (NAHC) in request of searches of the NAHC's Sacred Lands File (SLF) and a list of Native American representatives who may have interest in the project. The NAHC response provided a list of contacts for California Native American Tribes (Tribes). In November 2015, Tom Origer & Associates sent letters to two of the Tribes (Federated Indians of Graton Rancheria, Ya-Ka-Ama) in the NAHC contacts list. In February 2022, Tom Origer & Associates sent similar letters to 11 Tribes. No responses to those letters have been received to date.

On September 14, 2015, in support of required Native American consultation for the Project pursuant to California Public Resource Code (PRC) Section 21080.3, the County sent project notifications to associated tribal groups requesting that the recipients notify the County if they would like to consult pursuant to PRC Section 21080.3. On January 5, 2017, Brenda Tomaras (Lytton Rancheria) sent an email to the County requesting a copy of the cultural resources study report for the project. On January 13, 2017, the County forwarded Tomaras the cultural study via email, and on January 18, 2017, Tomaras replied with confirmation that Lytton Rancheria did not seek additional consultation on the project.

in July 2015, Assembly Bill 52 (AB52) went into effect amending CEQA Section 5097.94 of the Public Resources Code. AB52 establishes a consultation process with all California Native American tribes identified by the Native American Heritage Commission (NAHC) with cultural ties to an area. AB52 also creates a new class of resources under CEQA known as Tribal Cultural Resource. The County of Sonoma, as the Lead Agency under CEQA, is responsible for complying with the requirements of CEQA Section 5097.94 of the Public Resources Code. On April 9, 2024, Permit Sonoma sent formal consultation letters to associated tribal groups in accordance with Assembly Bill 52. On April 10, 2024, the Tribal Heritage Preservation Officer for the Federated Tribes of Graton Rancheria responded with a formal request for consultation on this project. To date, no other responses or communications have been received from the native community regarding this project.

On July 24, 2024, Permit Sonoma met with representatives of the Federated Tribes of Graton Rancheria for consultation under AB52. Permit Sonoma proposes mitigation measures recommended by the applicant's archaeological consultant to ensure avoidance of potential adverse impacts to cultural resources. The Tribe requested further time to review the project area and submitted cultural studies for the project.

On May 1, 2025, and on May 29, 2025, Permit Sonoma requested follow-up consultation meetings with Graton Rancheria. As of the of scheduling this initial study for publication, Permit Sonoma has not received a response for Graton Rancheria regarding a follow-up consultation meeting. Permit Sonoma acknowledges the Tribe has the right to review and provide input on the recommended mitigation measures for the project in response to 30-day public review period required this Initial Study following its formal publication.

[31] Stewart et al., 2002.

[32] Barrett, 1908.

Would the project:

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

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

Comment:
Through a records search, background research, field surveys, and correspondence with California Native American Tribes, no tribal cultural resources have been identified that would be potentially impacted by the project. Therefore, the project is not anticipated to impact any tribal cultural resources.

However, if any previously unrecorded archaeological resource were identified during project ground-disturbing construction activities and were found to qualify as a tribal cultural resource, pursuant to PRC Section 21074(a), any impacts on the resource resulting from the project could be potentially significant. The potentially significant impact would be reduced to a less-than-significant level with implementation of Mitigation Measures CUL-1 and CUL-2.
(refer to Section 2.5, *Cultural Resources*).

Significance Level:
Less than Significant with Mitigation

Mitigation:
Mitigation TCR-1: Implement Mitigation and Monitoring CUL-1 and CUL-2.

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

Comment:
See Comment 18.a.i

Significance Level:
Less than Significant with Mitigation

Mitigation:
Mitigation TCR-2: Implement Mitigation and Monitoring CUL-1 and CUL-2.

19. UTILITIES AND SERVICE SYSTEMS:

As described in the Sonoma County General Plan 2020 EIR, potable, commercial, industrial, and agricultural water supplies in Sonoma County are derived from a number of sources, including surface water, groundwater, and recycled water. Surface water sources are primarily used in the incorporated areas and are supplemented by groundwater. Residents in rural areas in the County tend to rely more on groundwater sources.

The Sonoma County Water Agency (SCWA) is a special district that provides potable water to over 600,000 people in Sonoma and Marin Counties. The SCWA's existing water transmission system

includes diversion facilities at the Russian River and an aqueduct system. The Agency operates three groundwater production wells in the Santa Rosa Plan that are also connected to the transmission system. The wells are located west of the City of Santa Rosa at Sebastopol Road, Occidental Road, and Todd Road. These wells are an additional source of water for the SCWA, and are capable of producing approximately 4 to 6 mgd.

A. Wastewater
There are eleven wastewater treatment plants in unincorporated Sonoma County. The North Coast Regional Water Quality Control Board or the San Francisco Bay Regional Water Quality Control Board, depending on the location of the plant, regulate discharge from each treatment plant.

B. Stormwater
The existing storm drain system which serves the project site captures stormwater which flows in a north easterly direction roadside to Bennett Valley Road, and outflows to Matanzas Creek approximately 1,500 feet from the proposed project area.

C. Solid Waste
The existing solid waste management system in Sonoma County includes a mix of public and private sector haulers, facilities, and facility operators. Solid waste transfer and disposal facilities are owned by the County and serve the cities and unincorporated portions of the county. These include four transfer stations (Healdsburg, Annapolis, Guerneville, and Sonoma), the Central Disposal Site, and the Sonoma Compost Facility, which is located at the Central Disposal Site. The County system is managed by the Sonoma County Integrated Waste Division of the Department of Transportation and Public Works.

D. Electricity
The majority of Sonoma County's electricity is provided by Pacific Gas and Electric Company (PG&E). The proposed project would be anticipated to connect to the existing electrical grid which currently serves the project site.

Would the project:

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

Comment:
Existing utilities infrastructure adjacent to the proposed project site includes water, storm drainage electrical, and natural gas. As demonstrated in the project description, the project would develop septic systems for each of the proposed residences. The proposed project would establish service connections to existing water service mains and would develop site drainage infrastructure that would drain into the existing storm drainage infrastructure downhill from the project site. The project would develop a small amount of new impervious surface area which would not be anticipated to substantially alter existing drainage in the project area. The project as a whole will develop connections to existing utility infrastructure and will not require the relocation or construction of offsite improvements to serve the project. Therefore, the project will have a less than significant impact.

Significance Level:
Less than Significant

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

Comment:
The proposed project would create new demand for water supply at the project site. The project is consistent with the land use assumptions within the growth model of the General Plan. Therefore, the demand created by the proposed project is anticipated to be within the project demand identified in

the General Plan. For this reason, the proposed project site would be provided adequate water service by the SCWA which was identified in the General Plan EIR as having sufficient supply to serve anticipated buildout of the General Plan. Water service for both domestic and irrigation uses will come from new water mains onsite. Additionally, General Plan Mitigating Policy PF-1d would require, as part of discretionary project applications within a water or sewer service area, written certification that either existing services are available or needed improvements will be made prior to occupancy. Therefore, as was concluded for implementation of the General Plan EIR, the proposed project would result in a less-than-significant impact related to water supply.

Significance Level:
Less than Significant

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

Comment:
The General Plan EIR found that land uses and development consistent with the General Plan 2020 would generate wastewater flows that exceed treatment capacity of wastewater treatment services and would require both construction of new facilities and improvements to existing facilities, resulting in a significant impact. The proposed project is consistent with the development assumptions of the General Plan and is subject to its established policies. The proposed project would not substantially increase demand for wastewater conveyance facilities beyond the amount anticipated in the General Plan EIR or require substantial offsite improvements that would constitute new or more significant impacts. This impact to wastewater capacity is less than significant.

Significance Level:
Less than Significant

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

Comment:
Solid waste for the proposed project would be managed and collected by Sonoma County. The Central Landfill, located at 500 Mecham Road in Petaluma, serves as the primary location for solid waste disposal by the County.

Given that the proposed project would introduce approximately eight residents to the project site, the project would generate an estimated daily disposal far below the current capacity of the Central Landfill and would be able to serve the proposed project. As a result, the proposed project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure and impacts to solid waste due to implementation of the proposed project would be less than significant.

Significance Level:
Less than Significant

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

Comment:
The proposed project would comply with applicable federal, state, and local management and reduction statuses and regulations related to solid waste. Solid waste collection for the proposed project would be subject to Chapter 1, Subchapter 1, Parts 239 through 259 of Title 40 of the Code of Federal Regulations (CFR), which include regulations pertaining to solid waste. The proposed project would also be subject to applicable policies for solid waste management within the General Plan, such as Policy PF-2a which urges the planning and design of solid waste services in accordance with projected growth. The proposed project would also comply with implementation programs for state

and local solid waste reduction goals including AB 939 (Integrated Waste Management Act) and the Sonoma County-wide Integrated Waste Management Plan; as such, the impact of the proposed project on solid waste management regulations and reduction statuses would be less than significant.

Significance Level:
Less than Significant

20. WILDFIRE

The proposed project site is located in an unincorporated portion of Sonoma County just outside the City of Santa Rosa. The site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ)33 as mapped by the California Department of Forestry and Fire Protection (CAL FIRE). The project site is located within the Sonoma County Fire District (SCFD) service area.

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

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Comment:
The project site is not located in a VHFHSZ as mapped by the California Department of Forestry and Fire Protection (CAL FIRE). As directed by Government Code 51175-89, the CAL FIRE identifies areas of very high fire hazard severity zones within Local Responsibility Areas (LRA). The project site is located within the Sonoma County Fire District (SCFD) service area.
Sonoma County has adopted an Emergency Operations Plan (EOP) that provides procedures to be followed in fire response. Further, the SCFD provides full-time fire prevention staff to plan check development permits.

Construction and operations of the proposed project would not affect or alter impair an adopted emergency response plan or emergency evacuation plan. It is not anticipated that implementation of the proposed project would cause similar level of temporary closures as could be the case during construction of large projects.

A written letter was prepared by Vern Losh and Associates[34] which describes the project access point along Bennett Valley Road and any issues related to line of sight and emergency access (see Appendix C). The letter states that there does not appear to be any significant or unusual line of sight restrictions at the project site, and that the project applicant will work with all onsite property owners to provide additional vegetation management to the site entrance off Bennett Valley Road. The project would meet all requirements of the Sonoma County Fire Code for roadway slope, width, surface, and turnouts. The Sonoma County Fire Marshal will conduct a final inspection to ensure all code requirements are satisfied. The impact would be less than significant.

Significance Level:
Less than Significant

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

Comment:

[33] California Department of Forestry and Fire Protection, 2023. Fire Hazard Severity Zone Viewer. Available: https://egis.fire.ca.gov/FHSZ/.
[34] Losh & Associates, May 6, 2025

Though the site is generally sloped from its entrance along Bennet Valley Road, the site does not pose wildfire risks due to prevailing winds or dense vegetation within the proposed development areas. Further, the proposed development is subject to comply with all applicable sections of the Sonoma County Fire Code and will be subject to a final inspection prior to approval by the Fire Marshal.

There are no site or project characteristics that would exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. As such, there is no potential for spread of wildfires due to the site characteristics.
The project site is not in a general area located downslope or downstream to experience post wildfire secondary effects such as flooding, landslides, or post fire slope collapse and drainage changes.

Construction activities occurring during the dry season have the potential to create sparks that could ignite dry grasses and weeds in the project area or on the project site. However, this risk is similar to that found at other construction sites and ongoing vegetation management practices would ensure that wildland fires would be unlikely to occur. The proposed project would develop the project site with residential uses and would be subject to similar conditions for which vegetation management practices would remain applicable and effective in minimizing the potential fire hazards from construction. For this reason, the impact of the proposed project with respect to fire hazards would remain less than significant.

Significance Level:
Less than Significant

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

Comment:
See Comment 20.a

Significance Level:
Less than Significant

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Comment:
See Comment 20.b

Significance Level:
Less than Significant

21. MANDATORY FINDINGS OF SIGNIFICANCE

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

Comment:
No. Based on the technical conclusions and recommended mitigation measures identified within this study, the project's potential for degrading the quality of the environment, reducing the habitat of fish or wildlife species, causing a fish or wildlife population to drop below self-sustaining levels, threatening to eliminate a plant or animal community, reducing the number or restricting the range of

a rare or endangered plant or animal or eliminating important examples of the major periods of California history or prehistory is found to be less than significant. Potential project impacts on special-status plant and fish/wildlife species and habitat are addressed in Section 4 of this document. Implementation of the required mitigation measures (Mitigations BIO-1, BIO-2, BIO-3, BIO-4, and BIO-5) would reduce these potential impacts to a less-than-significant level. Potential adverse project impacts to cultural resources are addressed in Section 18. Implementation of the required mitigation measures (Mitigations CUL-1, CUL-2, TCR-1, and TCR-2) would reduce these potential impacts to a less-than-significant level.

Significance Level:
Less than Significant with Mitigation

Mitigation:
Mitigations BIO-1 thru BIO-5, Mitigation CUL-1 and CUL-2, and Mitigation TCR-1 and TRC-2

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

Comment:
The project does not result in individually limited impacts that are cumulatively considerable. In accordance with CEQA Guidelines Section 15183, this environmental analysis was conducted to determine if there were any project-specific effects that are cumulatively considerable. Analysis provided within this initial study found no significant project-level impacts that would be cumulatively significant with implementation of recommended mitigation measures and best management practices. The proposed subdivision supports a limited and fixed-level of additional residential development potential that is neither considered growth-inducing nor of such a type and intensity of development that may cause unforeseeable increases in population, traffic, or greenhouse gas levels beyond those levels evaluated in the General Plan. There are no unusual cumulative development trends in the area that were not already considered in the County's General Plan and General Plan EIR. All new development in the area is subject to County approval depending on the site's location. New development would be subject to separate environmental review and General Plan consistency.

This study identifies specific mitigation measures that when implemented accordingly, reduce project-level and potential cumulative-level impacts to a less-than-significant level. The project supports a type and intensity of residential development potential that is consistent with the that allowed by the General Plan, and individual impacts when considering past, present, and probable future projects, are determined limited and not cumulatively significant. The project will not therefore, result in impacts that are cumulatively considerable.

Significance Level:
Less than Significant

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

Comment:
As discussed in the various section throughout this CEQA document, the proposed project would not include uses resulting in substantial adverse effects to human beings either directly or indirectly.

Significance Level:
Less than Significant