APPENDIX A
Initial Study

Montaldo Apartments Project
INITIAL STUDY

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A. PROJECT DESCRIPTION

The project description for the Montaldo Apartments Project (proposed project) is provided in Chapter II, Project Description, of the Environmental Impact Report (EIR), to which this initial study is an integral part.

B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The proposed project could potentially result in adverse physical effects on the environmental resources checked below. This Initial Study evaluates the potential for the proposed project to result in significant environmental impacts for each environmental topic listed above. The impact evaluation considers project impacts both individually and cumulatively. Impacts that are found to be potentially significant in this Initial Study are addressed in the EIR.

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

B.1 AESTHETICS

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Impact AE-1: The proposed project would not result in substantial adverse effect on a scenic vista. (*Less than Significant*)

City of Sonoma Municipal Code (SMC) Section 19.40.130.C defines "scenic vistas" as public views, benefiting the community at large, of significant features, including hillside terrain, ridgelines, canyons, geologic features, and community amenities (e.g., parks, landmarks, permanent open space). This also includes public views from road corridors of the hillsides that adjoin Sonoma Valley. Moreover, the SMC requires that new structures be constructed in a manner that preserves scenic vistas by maintaining view corridors (SMC Section 19.40.130.D), including unbuilt space between buildings, view opportunities created from undeveloped lots, airspace created from public parks and open spaces, and open spaces created from the deliberate spacing of buildings on the same lot or adjacent lots.

The project site is in a relatively flat area of the City of Sonoma. Views of hillsides are available in the background looking westside from Sonoma Highway and to the north and northeast

towards the Sonoma Mountains. These views are limited as they are substantially obscured by existing buildings and vegetation.

The proposed project would develop the project site with 50 apartment units in seven residential buildings of two and three stories in height. The proposed project would be consistent with the existing development pattern near the project site and would include landscaped areas and pedestrian paths to provide access to and around the new buildings. Therefore, construction of the proposed project would not have a substantial adverse impact on a scenic vista and would result in a ***less-than-significant impact***.

Impact AE-2: The proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. (*Less than Significant*)

SR 12 segment within the City of Sonoma, has not been officially designated as a California State Scenic Highway. However, this segment is included on the list of highways eligible for scenic highway designation in Caltrans' Streets and Highways Code Section 263.[1] The City of Sonoma General Plan calls for the improvement of pedestrian and bicycle access, and right-of-way beautification along the Highway 12 corridor.[2] The highway corridor has views of the surrounding hills and ridgelines of the Sonoma Mountains to the west, north, and northeast. Views of the hills from the project site are limited as they are substantially obscured by existing buildings and vegetation. The proposed project would result in visual changes along SR 12 within the project corridor. Notably, the single-family house fronting the project site would be replaced with a two-story building (**Figure B-1**). However, the proposed project would preserve the large valley oak tree near SR 12. The remaining portion of the project site would be developed with two and three-story residential buildings, a central open space area, other landscaped areas, and pedestrian paths. In addition, the proposed development would have a contemporary version of Spanish architecture to maintain a design context similar to the existing single-family home. The proposed Building 1, facing Sonoma Highway, would be a two-story building with archways framing the front doors. **Figures B-1** and **B-2** present the visual simulations of the proposed project from SR 12. As shown in **Figures B-1** and **B-2**, the scale, massing, and architectural style integrate with the surrounding built environment. Existing views of the surrounding hills remain unobstructed. The proposed new building setback, landscape, and sidewalk, preserve the visual continuity of the streetscape and minimize and perceptible visual impact. Therefore, the visual character/quality of the views experienced within the View Corridor would not be substantially reduced as a result of the proposed project. The impact would be ***less than significant***.

Impact AE-3: The proposed project would no substantially degrade the existing visual character or quality of public views of the site and its surroundings or conflict with applicable zoning and other regulations governing scenic quality. (*Less than Significant)*

The project site is within an urbanized area of the City of Sonoma. The visual character surrounding the project site is primarily characterized by one to three-story low-density commercial and residential development with a variety of architectural styles. Most of the residential buildings are located south and east of the site and are one-story single-family dwellings or multi-unit buildings. Commercial uses tend to be clustered west and north of the

[1] California Department of Transportation (Caltrans). 2023. California State Scenic Highway System Map. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed July 28, 2023.
[2] City of Sonoma. 2006. 2020 General Plan. October.

site, along SR 12, and are primarily retail, automobile-oriented shopping centers, and office parks, with one- to two-story buildings surrounded by concrete parking lots.

The existing visual quality of the project site is relatively high. The project frontage includes the single-family home that is eligible for listing on the California Register of Historical Resources and the large valley oak tree. The proposed project would involve the construction of seven multi-unit residential buildings. The project would change the visual quality of the interior of the project site incrementally, resulting in a slightly more densely developed property. However, as shown in **Figures B-1** and **B-2**, the proposed height and massing would be compatible with the development surrounding the project site.

The proposed project would comply with the recommendations of the City's Planning Commission that include limiting the height of the building near the Sonoma Highway to the west and the residences to the east to two stories, setting back the building from Sonoma Highway to 50 feet, and incorporating a central common area. In addition, the proposed development would have a contemporary version of Spanish architecture to maintain a design context similar to the existing single-family home. The proposed Building 1, facing Sonoma Highway, would be a two-story building with archways framing the front doors. A 3-foot fence would border the project site along SR12 as shown in **Figure B-1**.

For visual compatibility of new development with its surroundings, the City of Sonoma requires an analysis of the project-specific design to assess project consistency with applicable standards related to the visual character and applicable design guidelines.

Consistency with Planning Standards. The site is designated as Housing Opportunity in the West Napa Street/Sonoma Highway Corridor. **Table B-1** below, presents the project consistency with the site planning standards provided in SMC Section 19.34.020.

TABLE B- 2
SUMMARY OF DEVELOPMENT CODE COMPLIANCE
(STANDARDS RELATED TO BUILDING HEIGHT AND MASS)

Development Feature	Development Code Allowance (SMC Section 19.34.020, Table 3-26)[a]	Proposed Project
Building Setbacks	Front: None required; Side: 8 feet; Rear: 12 feet;	Front/Streetside: 50 feet; Side (West): 25 feet;
Floor Area Ratio (FAR)[b]	0.70	0.72[c]
Site Coverage	65%	58%
Maximum Roof Height (Primary Structure)	30 feet	2-story buildings: approximately 29.5 feet 3-story buildings: 36 feet

[a] SMC Section 19.34.020
[b] The ratio of developed square feet to lot size
[c] Applicant is requesting a concession for exceeding allowable FAR,
[d] The project would not comply with the required setback for trash enclosures, for which the applicant is requesting a waiver.
[e] Not all patios would meet minimum dimensions requirements. The applicant is requesting a concession for not complying with SMC Section 19.40.070

As shown in **Table B-1** above, the proposed project would be consistent with site planning standards, as outlined in SMC Section 19.34.020, relating to massing, setbacks, and building height. However, the proposed project would exceed the allowable floor area ratio at the project site of 0,70. As described in **Section II.3 - Proposed Project Characteristics** of the EIR, of the proposed 50 residential units, 13 units (approximately 26 percent) would be reserved at the below market rates of extremely low income (2 units), very low income (3 units), and low income (8 units). Therefore, in compliance with Government Code Section 65915, the project would be

eligible for a 32.5 percent density bonus and allowance of two incentives or concessions and unlimited waivers of the City development standards. As such, the Applicant intends to request a concession for exceeding the floor area ratio due to site constraints, with the goal of developing the site with 50 apartment units with associated garage spaces within the minimum allowable dimensions.

Moreover, consistent with the "Desired Future" conditions of the West Napa Street/Sonoma Highway Corridor, the proposed project would fill the sidewalk gap at the project frontage along SR 12 and would locate new parking in the back of the properties. Design guidance of the West Napa Street/Sonoma Highway Corridor that are applicable to the proposed project include:

- Natural Features. Preserving significant environmental amenities, such as mature trees, and incorporating them into site plan design and layout.

- Screening and Buffering. Screening and buffering parking and driveway areas, as well as noise and light sources.

The proposed project would preserve the large valley oak tree at the entrance of the project site. In addition, the project landscaping would be consistent with the City Municipal Code (SMC Section 19.40.060) Landscaping and would include a 6-foot wood fence on the north, east, and south perimeter of the project site. Hedges and landscape features would be located throughout the project site.

In summary, although the development of the proposed project would change the visual character of the site, the project would be consistent with the applicable standards and guidelines of the Planning and Design Standards for the Highway 12 corridor and would be visually compatible with its surroundings. Therefore, the proposed project would not substantially degrade the existing visual character or quality of the project site or its surroundings and this impact would be *less than significant*.

Impact AE-4: The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. (*Less than Significant*)

The proposed project would include exterior features for safety and security, such as exterior building lighting and parking lot lighting. However, this lighting would be typical of residential development throughout the city. In addition, all proposed exterior lighting would be subject to the exterior lighting standards of the City's Development Code, which specify that exterior light fixtures must be shielded to reduce or eliminate light spillage off-site. Therefore, the proposed project would not create a new source of substantial light or glare that would adversely affect daytime or night-time views in the area. This impact would be *less than significant*.

Impact C-AE-1: The proposed project would not result in significant cumulative impact related to aesthetics. (*Less than Significant*)

Cumulative impacts related to aesthetics are limited to the area in which the proposed project may be viewed in combination with one or more of the other projects considered in the cumulative analysis. Both cumulative projects would not be viewed in combination with the proposed project. In addition, cumulative projects would be subject to the requirements of the Sonoma Municipal Code, Section 19.54.080, Site Design and Architectural Review, which include provisions for projects compliance with the City's standards and design guidelines.

While the project would change the visual character of the proposed site with the demolition of the historic house, the project would be required to comply with City Municipal Code requirements related to design standards and would not be viewed in combination with the other cumulative projects. Therefore, the proposed project would not have a cumulatively considerable contribution to any significant cumulative impact.

Source: *DeNova Homes, 2024*

Figure B-1. Project Simulation- View Northeast

Source: *DeNova Homes, 2024*

Figure B-2. Project Simulation- View Southwest

B.2 AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Impact AG-1: The proposed project would not 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. (*No Impact*)

The project site is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Department of Conservation. The project site is identified as "Urban and Built-up Lands" on the Important Farmland Map maintained by the Department of Conservation.[3] Therefore, the proposed project would have ***no impact*** on any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

Impact AG-2: The proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. (*No Impact*)

The project site is not zoned for any agricultural uses and does not contain land under the Williamson Act contract. Therefore, the proposed project would have ***no impact*** on these resources.

Impact AG-3: The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)), or would result in the loss of forest resources. (*No Impact*)

The project site does not contain any forest lands as defined in Public Resources Code Section 12220(g) and is not zoned for forest uses. In addition, the project site is not located in the vicinity of forest resources. Therefore, the proposed project would have ***no impact*** on forest resources.

Impact AG-4: The proposed project would not 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. (No Impact)

As discussed above, the project site does not support Prime Farmland or other agriculture uses or resources or forestry uses or resources. Therefore, the development of the proposed project would have ***no impact*** related to the conversion of farmland or forest land.

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[3] California Department of Conservation. 2023. https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed: August 30, 2023.

B.3 AIR QUALITY

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The project site is located in the City of Sonoma and is within the jurisdiction of the Bay Area Air Quality Management District (renamed as Bay Area Air District [BAAD]).

Air Pollutants of Concern

High ozone concentrations in the air basin are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NO_X). These precursor pollutants react under certain meteorological conditions to form ozone concentrations. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce ambient ozone concentrations.

Particulate matter is another problematic air pollutant in the air basin. Particulate matter is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM_{10}) and fine particulate matter where particles have a diameter of 2.5 micrometers or less ($PM_{2.5}$). Elevated concentrations of PM_{10} and $PM_{2.5}$ are the result of both region-wide (or cumulative) emissions and localized emissions.

The State of California and the federal government set ambient air quality standards within the BAAD for ozone, carbon monoxide (CO), NO2, SO2, PM10, PM2.5, and lead (Pb). The State has also set standards for sulfate and visibility. The BAAD is under State non-attainment status

for ozone and particulate matter standards. The BAAD is classified as non-attainment for the federal ozone 8-hour standard and non-attainment for the federal $PM_{2.5}$ 24-hour standard.

Toxic Air Contaminants

Toxic Air Contaminants (TACs) are a broad class of compounds known to cause morbidity or mortality, often because they cause cancer. TACs are found in ambient air, especially in urban areas, and are caused by manufacturing, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners).

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs (based on the Bay Area average). Health risks from TACs are estimated using the Office of Environmental Health Hazard Assessment (OEHHA) risk assessment guidelines, which were published in February of 2015 and incorporated in the Bay Area Air District (BAAD's) current CEQA guidance.[4] PM2.5 emissions can include TACs. Due to the adverse health effects caused by PM2.5 exposure even at low concentrations, BAAD developed health risk thresholds to address exposure to increased PM2.5 concentrations caused by a project's emissions.[5]

Sensitive Receptors

There are groups of people more affected by air pollution than others. The California Air Resources Board (CARB) has identified the following persons who are most likely to be affected by air pollution: children under 16, people over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive individuals include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools. For cancer risk assessments, infants and small children are considered the most sensitive receptors, since they are more susceptible to cancer causing TACs. Therefore, residential locations are assumed to include infants and small children.

The closest sensitive receptors to the project site are the adjacent single- and multi-family homes to the east, south, and west (Figure B-3). There are also sensitive receptors located in the single- and multi-family residences to the north and northwest. Additional sensitive receptors are located further distances from the project site. In addition, this project would introduce new sensitive receptors (i.e., residents) to the area.

BAAD CEQA Air Quality Guidelines

In June 2010, BAAD (then known as the Bay Area Air Quality Management District or BAAQMD) adopted thresholds of significance to assist in the review of projects under CEQA. In 2023, BAAD revised the *California Environmental Quality Act* (*CEQA) Air Quality Guidelines* that include significance thresholds to assist in the evaluation of air quality impacts of projects proposed within the Bay Area. The current BAAD guidelines provide recommended procedures for evaluating potential air impacts during the environmental review process consistent with CEQA requirements including thresholds of significance, mitigation measures, and background air quality information. The BAAD guidelines include assessment methodologies for criteria air

[4] OEHHA, 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. Office of Environmental Health Hazard Assessment. February.
[5] BAAD, 2022 CEQA Air Quality Guidelines, Appendix A, p40.

pollutants and TAC emissions as shown in **Table B-2**.[6] Air quality impacts and health risks from projects are considered potentially significant if they exceed these thresholds.

TABLE B-2. BAAD CEQA SIGNIFICANCE THRESHOLDS

Criteria Air Pollutant	Construction Thresholds			
	Average Daily Emissions (lbs./day)			
ROG	54			
NO_x	54			
PM_{10}	82 (Exhaust)			
$PM_{2.5}$	54 (Exhaust)			
CO	Not Applicable			
Fugitive Dust ($PM_{10}/PM_{2.5}$)	Best Management Practices (BMPs)*			
Health Risks and Hazards	**Single Sources/ Individual Project**		**Combined Sources (Cumulative from all sources within 1000-foot zone of influence)**	
Excess Cancer Risk	>10 in a million	OR Compliance with Qualified Community Risk Reduction Plan	>100 in a million	OR Compliance with Qualified Community Risk Reduction Plan
Hazard Index	>1.0		>10.0	
Incremental annual $PM_{2.5}$	>0.3 µg/m^3		>0.8 µg/m^3	

Note: ROG = reactive organic gases, NOx = nitrogen oxides, PM_{10} = course particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, $PM_{2.5}$ = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less.
* BAAD strongly recommends implementing all feasible fugitive dust management practices especially when construction projects are located near sensitive communities, including schools, residential areas, or other sensitive land uses.

Source: Bay Area Air District, 2022

Impact AIR-1: The project would not conflict with or obstruct implementation of the applicable air quality plan. (*Less than Significant*)

The applicable air quality plan is the BAAD 2017 Clean Air Plan (Clean Air Plan),[7] which is a comprehensive plan to improve Bay Area air quality and protect public health. The Clean Air Plan defines control strategies to reduce emissions and ambient concentrations of air pollutants; safeguard public health by reducing exposure to air pollutants that pose the greatest health risk, with an emphasis on protecting the communities most heavily affected by air pollution; and reduce greenhouse gas emissions to protect the climate.

Consistency with the Clean Air Plan can be determined if the project: (1) supports the goals of the Clean Air Plan; (2) includes applicable control measures from the Clean Air Plan; and (3) would not disrupt or hinder implementation of any control measures from the Clean Air Plan.

(1) Clean Air Plan Goals. The primary goals of the Clean Air Plan are to: attain air quality standards, reduce population exposure and protect public health in the Bay Area, and reduce greenhouse gas emissions and protect the climate.

[6] BAAD, 2023. *2022 CEQA Guidelines*. April.
[7] BAAQMD. 2017. Final 2017 Clean Air Plan. Adopted April 19.

The BAAD has established significance thresholds for project construction and operational impacts at a level at which the cumulative impact of exceeding these thresholds would have an adverse impact on the region's attainment of air quality standards. The proposed project falls substantially below the BAAD-established construction and operational project screening level sizes for criteria air pollutant impacts with 50 apartment units compared to the screening levels of 416 units for construction and 638 units for operation. The proposed project is within a developed area of the City of Sonoma with access to nearby public transportation. In addition, the proposed project would close a sidewalk gap fronting the project site and improve conditions for pedestrians. It would also provide bicycle parking facilities within the parking garages and in the center of the community north of the drive aisle.

(2) Clean Air Plan Applicable Control Measures. The Clean Air Plan encompasses control strategies measures in the following categories: Stationary Source Measures, Transportation Measures, Energy Measures, Building Measures, Agriculture Measures, Natural and Working Lands Measures, Waste Management Measures, Water Measures, and Super-Greenhouse Gas (GHG) Pollutants Measures.

The proposed project would incorporate several features that are consistent with the project-scale goals of the 2017 Bay Area Clean Air Plan. For example, the proposed project would be consistent with key elements in the control strategy such as: "direct new development to areas that are well-served by transit, and conducive to bicycling," "promote energy and water efficiency in both new and existing buildings," and "promote the switch from natural gas to electricity for space and water heating in Bay Area buildings." The proposed project is generally consistent with these measures as it proposes a residential multi-unit infill development in an area served by transit service and is near existing Class I, and II bike routes (on Verano Avenue and between SR 12 and 4th Street East) and adjacent to the planned Class II bike route on SR 12.[8] In addition, the proposed project would be compliance with the latest California Green Building Standards Code (CALGreen), which includes green building features that promote energy and water conservation. Moreover, the proposed units would not include natural gas and would rely fully on electric energy.

(3) Consistency with implementation of Clean Air Plan Measures. The proposed project does not contain features that would conflict with or obstruct implementation of any 2017 Clean Air Plan control measures. Therefore, the proposed project would conform to this determination of consistency for the 2017 Clean Air Plan. In addition, as discussed below in **Section B.14 - Population and Housing**, the proposed project would not result in the increase of population or housing that was not foreseen in the City planning forecast. Therefore, it would not have the potential to substantially affect housing, employment, and population projections within the region, which is the basis of the 2017 Bay Area Clean Air Plan projections. Furthermore, as detailed under **Impact AIR-2** below, the proposed project would not exceed the BAAD-recommended thresholds of significance for assessing project-level impacts associated with regional criteria air pollutant and precursor emissions. These thresholds are established to identify projects that have the potential to generate a level of emissions that would be

[8] Class II bike lane is classified in the Caltrans Highway Design Manual as a stripped and signed Lane for one-way bike travel on a street or highway.
Class I is classified in the Caltrans Highway Design Manual as a multi-use path completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.

cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

As demonstrated under **Impact AIR-2** below, construction emissions associated with the proposed project would be well below the BAAQMD significance thresholds for criteria air pollutants. Therefore, the project would not result in a cumulatively considerable contribution to the existing air quality conditions of the San Francisco Bay Area Air Basin. For these reasons, the proposed project would not conflict with or obstruct implementation of the 2017 Bay Area Clean Air Plan, and this impact would be ***less than significant***.

Impact AIR-2: The project would not 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. (*Less than Significant with Mitigation*)

The BAAD is currently designated as a non-attainment area for State and national ozone standards and national particulate matter ambient air quality standards. The BAAD non-attainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in non-attainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the BAAD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. The following analysis assesses the potential construction- and operation-related air quality impacts of the proposed project.

Construction Emissions. During construction, the proposed project would temporarily affect air quality due to the release of particulate matter emissions (i.e., fugitive dust) generated by grading, hauling, and other activities. Emissions from construction equipment are also anticipated and would include CO, NOx, ROG, $PM_{2.5}$, PM_{10}, and TACs such as diesel exhaust particulate matter.

Site preparation phase and project construction would involve demolition, grading, and other soil-disturbance activities, which would have the greatest effect on air quality during construction. These activities would be the main source of fugitive dust and would temporarily generate particulate emissions. In addition, construction vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust. The proposed project would implement **Mitigation Measure AIR-2**, which includes BAAD standard construction measures to reduce fugitive dust emissions from construction activities.

In addition to fugitive dust emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO2, NOx, ROGs and small particulate matters ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles are delayed. These emissions would be temporary and limited to the immediate area surrounding the construction site.

Consistent with BAAD recommendations, construction emissions were estimated for the project. **Table B-3** below, presents the calculated project emissions of criteria pollutants using the California Emissions Estimator Model (CalEEMod) version 2022. Construction activities are expected to begin early 2026 and occur for approximately 26 months. In addition, the proposed project would include the import of 4,000 cubic yards of soil, which was included in CalEEMod.

Construction would generate traffic from workers and trucks coming to and leaving the site. Traffic-related emissions are based on worker and vendor trip estimates produced by CalEEMod and haul trips that were computed based on the estimated amount of demolition material to be exported, provided amount of soil imported and/or exported to the site, and the estimate of concrete and asphalt deliveries to and from the site. The project construction is estimated to require approximately 2,800 truck trips with approximately 1,800 of the trips for transportation of building materials. Construction workers trips are estimated to range between 18 and 36 daily trips during the 26 months construction phase.

As a conservative approach, this analysis includes CalEEMod default assumptions for the construction phasing, construction equipment, and construction fleet activities. Construction-related emissions are presented in **Table B-3** below. CalEEMod output sheets are included in **Appendix D**.

TABLE B-3
PROJECT CONSTRUCTION – CRITERIA AIR POLLUTANTS EMISSIONS (POUNDS PER DAY)

Construction Year	ROG	NO_x	PM_{10} (exhaust)	$PM_{2.5}$ (exhaust)
Construction Emission pers Year (Tons)				
2026	0.27	0.82	0.04	0.03
2027 +2028	0.11	0.24	0.01	0.01
Average Daily Construction Emissions per Year (pounds per day)				
2026	2.09	6.28	0.27	0.24
2027 +2028	3.58	1.68	0.05	0.05
BAAQMD Thresholds (pounds per day)	54	54	82	54
Exceed Thresholds?	No	No	No	No

Source: **Appendix D** presents detailed modeling inputs and calculations

As shown in **Table B-3**, construction emissions associated with the proposed project would be well below the BAAQMD significance thresholds for criteria air pollutants.

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries.

Mitigation Measure AIR-2 requires implementation of BAAD best management practices (BMPs) during construction to control fugitive dust emissions. BAAD considers with implementation of the BMPs impact from dust would not be significant. Therefore, with implementation of **Mitigation Measure AIR-2**, construction of the proposed project would not 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, and impacts would be ***less than significant with mitigation incorporated***.

As discussed above, the BAAD operational screening level size for a multi-unit residential project is 638 units.[9] The proposed project would include 50 apartment units, which is well below the BAAD screening size. As a result, per BAAD guidance, a detailed air quality assessment of the proposed project's operational criteria air pollutant emissions is not necessary as project operation would not 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. Therefore, impact on air quality as a result of the proposed project during operation would be ***less than significant***.

Impact AIR-3: The project would not expose sensitive receptors to substantial pollutant concentrations ***(Less than Significant with Mitigation)***

The proposed project would generate toxic air contaminants (TACs) during construction from the use of diesel-powered construction equipment and during operation from increased vehicle trips. The construction and operational health risks from the project's emissions are further analyzed below.

Operational Emissions

The proposed project would generate new vehicle trips which emit toxic air contaminants. During operation, the proposed project would generate 366 trips per weekday, including 23 trips during the morning peak hour and 28 trips during the evening peak hour. Given the average daily traffic volume on SR 12 is approximately 10,000 trips[10], the 366 daily trips would be considered minor low impact sources and would not generate a substantial amount of TAC emissions that could affect nearby sensitive receptors. Therefore, the proposed project would not emit toxic air contaminants at levels that would expose sensitive receptors to substantial air pollutant concentrations and this impact would be ***less than significant***.

Construction Emissions

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust and $PM_{2.5}$, which are considered TACs by BAAD. Therefore, health risk impacts from construction activities were assessed at sensitive receptors using the emissions estimated by CalEEMod. Increased lifetime cancer risk, annual $PM_{2.5}$ concentrations, and Hazard Index (HI) for non-cancer health risks were predicted for the maximum concentration location, or maximally exposed individual (MEI). A dispersion model was used to predict the off-site concentrations resulting from project construction, so that lifetime cancer risks and non-cancer health effects could be evaluated.

Modeled Sensitive Receptors. Receptors for this assessment included locations where sensitive populations would be present for extended periods of time (i.e., chronic exposures). This includes the existing nearby residences, as shown in **Figure B-3**. Residential receptors are assumed to include all receptor groups (i.e., third trimester, infants, children, and adults) with almost continuous exposure to construction emissions. While there are additional sensitive receptors within 1,000 feet of the project site, the receptors chosen near the site are adequate to identify maximum impacts as a result of the proposed project.

[9] BAAQMD. 2022 CEQA Guidelines. Screening for Criteria Air Pollutants and Precursors.
[10] Caltrans. Traffic Sensus Program. Traffic Volumes: Annual Average Daily Traffic for all Vehicles on California State Highways. SR12 from Verano Avenue to Petaluma Avenue. Year 2022. https://dot.ca.gov/programs/traffic-operations/census. Accessed on March 4, 2025.

Construction Emission Sources. DPM exhaust emissions were modeled as an array of point sources to reflect construction equipment and trucks operating at the site. For modeling fugitive $PM_{2.5}$ emissions, an area source with a near-ground level release height of 7 feet (2 meters) was used as the average release height of off-road construction equipment at the project site.

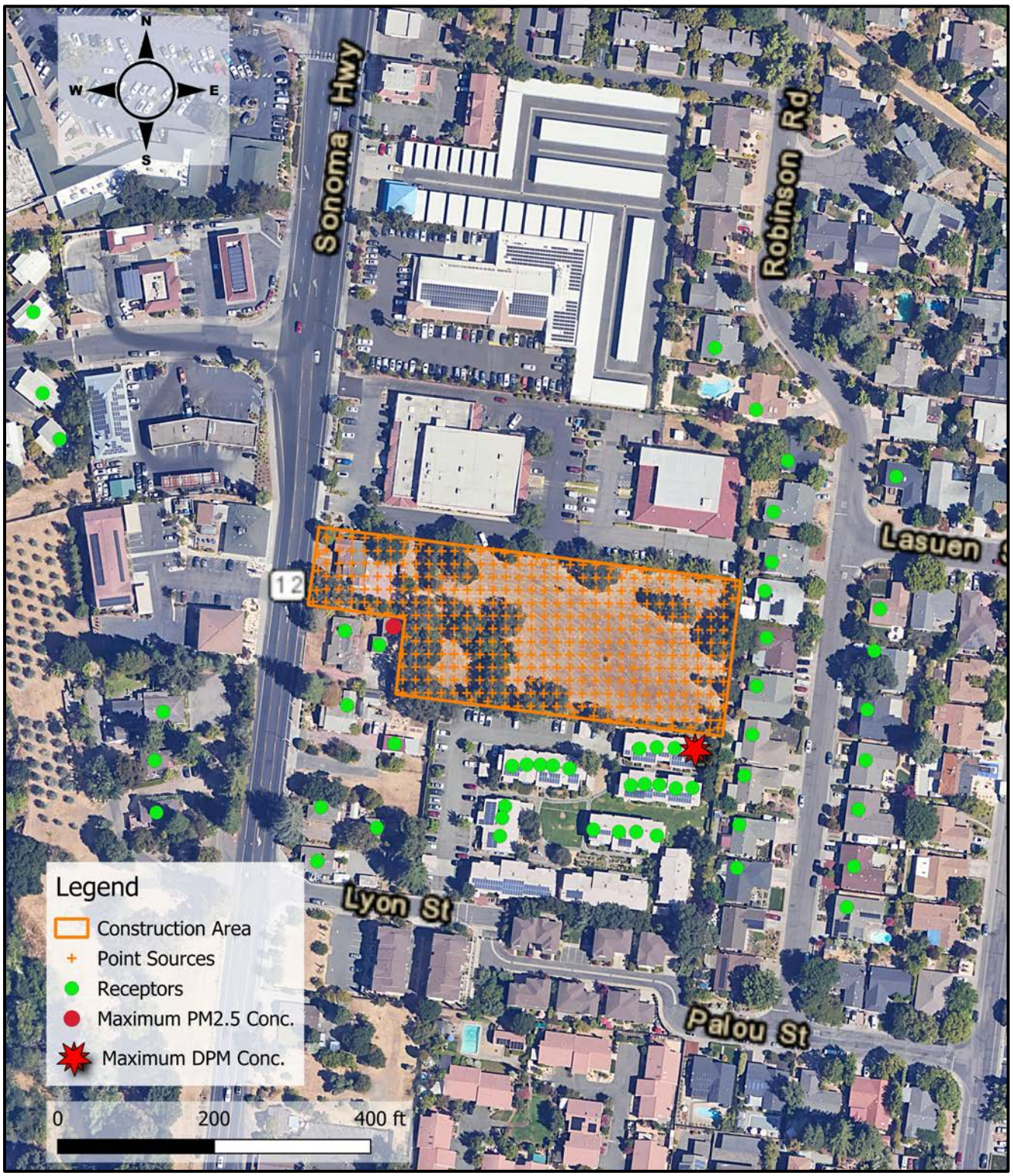
Construction emissions were modeled as occurring Monday through Friday between 7:00 a.m. to 4:00 p.m., when the majority of construction is expected to occur. Receptor heights of 5 feet (1.5 meters) and 15 feet (4.5 meters) were used to represent the breathing heights of receptors on the first and second floors of nearby single- and multi-family residences.[11]

Construction Health Risk Impacts. The maximum increased cancer risks were calculated using the modeled DPM concentrations combined with the BAAD CEQA guidance for age sensitivity factors and exposure parameters. Age-sensitivity factors reflect the greater sensitivity of infants and small children to cancer causing TACs. Third trimester, infant, child, and adult exposures were assumed to occur at all residences during the entire construction period. Non-cancer health hazards (hazard index)[12] and maximum $PM_{2.5}$ concentrations were also calculated.[13]

Results of this assessment indicated that the construction MEIs were located at two different receptors. The cancer risk MEI was located on the second floor (15 feet above the ground) at the multi-family home southeast of the project site. The annual $PM_{2.5}$ MEI was located on the first floor (5 feet above the ground) at a receptor southwest of the site. The location of the MEIs and nearby sensitive receptors are shown in **Figure B-3**. **Table B-4** summarizes the maximum cancer risks, $PM_{2.5}$ concentrations, and Hazard Index for project related construction activities.

As shown in **Table B-4**, maximum cancer risks from construction activities at the construction MEIs would exceed the single-source significance threshold. However, with the implementation of **Mitigation Measure AIR-3**, **Construction Equipment with Low Diesel Particulate Matter Exhaust Emissions**, which would require all construction equipment to meet U.S. EPA Tier 4 final engine standards, the cancer risk would be reduced by 81 percent (for infant exposure) and would be below the significance threshold. The annual $PM_{2.5}$ concentration and Hazard Index from construction activities would be below the single-source significance thresholds without mitigation. Therefore, project construction pollutant emissions would be well below the BAAD single-source cancer risk threshold, and this impact would ***be less than significant with mitigation incorporated***.

[11] BAAD, 2022. BAAQMD CEQA Air Quality Guidelines Appendix E. April 2023.
[12] The maximum hazard index value was computed based on the ratio of the maximum DPM concentration to the chronic inhalation refence exposure level for DPM of 5 $\mu g/m^3$.
[13] The maximum modeled annual $PM_{2.5}$ concentration was calculated by combining the DPM and fugitive $PM_{2.5}$ concentrations.



Source: *Illingworth & Rodkin, 2025*

Figure B-3
Off-Site Sensitive Receptors and Maximum TAC Impacts (MEIs)

TABLE B-4
CONSTRUCTION RISK IMPACTS AT THE OFF-SITE MEIS

Source	Cancer Risk[1] (per million)	Annual $PM_{2.5}$[1] ($\mu g/m^3$)	Hazard Index
Project Construction			
Unmitigated	11.06 (infant)	0.29	0.01
Mitigated	3.36 (infant)	0.27	<0.01
BAAD Single-Source Threshold	*>10.0*	*>0.3*	*>1.0*
Exceed Threshold?			
Unmitigated	**Yes**	No	No
Mitigated[2]	No	No	No

Source: **Appendix D** presents detailed modeling inputs and calculations

Notes: [1] The maximum cancer risk and $PM_{2.5}$ concentration impacts occur at different receptor locations.
[2] Construction equipment with Tier 4 final engines as a Mitigation Measure and required basic BMPs.

Cumulative Health Risks of all TAC Sources at the Off-Site MEIs

Cumulative health risk assessments look at all substantial sources of TACs located within 1,000 feet of a project site (i.e., influence area) that can affect sensitive receptors. These sources include rail lines, highways, busy surface streets, and stationary sources identified by BAAD. **Figure B-4** shows the locations of the sources affecting the MEIs within the influence area. Health risk impacts from these sources upon the MEIs are reported in **Table B-5**.

Nearby Local Roadways. The project site is located in a mixed-use area near one arterial roadway, SR 12, and several other local roadways. Screening-level cancer risk, $PM_{2.5}$ concentration, and HI for the cumulative roadway impacts at the construction MEIs are presented in **Table B-5**.

BAAD Permitted Stationary Sources. Two permitted stationary sources of air pollution near the project site were identified using BAAD's *Permitted Stationary Sources 2022* GIS map website.[14] Health risk impacts from the stationary sources upon the MEIs are reported in **Table B-5**.

Table B-5 reports both the proposed project and cumulative health risk impacts. The cumulative annual cancer risk, maximum $PM_{2.5}$ concentration, and HI values, would not exceed the BAAD's cumulative source health risk thresholds. Therefore, cumulative health risk impacts during construction would be ***less than significant***.

Non-CEQA: On-site Health Risk Assessment of TAC Sources - New Sensitive Receptors

In addition to evaluating health risks from project construction, a health risk assessment was conducted to assess the impacts existing TAC sources would have on the new proposed sensitive receptors (residents). The same TAC sources identified above (i.e., stationary sources and roadways) were included in the assessment.[15] Results of the onsite assessment are listed in **Table B-6**. Information used for determining the health risk impacts upon on the proposed project on-site sensitive receptors are presented in **Appendix D**.

[14] BAAD, Web: https://baaqmd.maps.arcgis.com/apps/webappviewer/index.html?id=845658c19eae4594b9f4b805fb9d89a3
[15] We note that to the extent this analysis considers existing air quality issues in relation to the impact on future residents of the Project, it does so for informational purposes only pursuant to the judicial decisions in CBIA v. BAAQMD (2015) 62 Cal.4th 369, 386 and Ballona Wetlands Land Trust v. City of Los Angeles (2011) 201 Cal.App.4th 455, 473, which confirm that the impacts of the environment on a project are excluded from CEQA unless the project itself "exacerbates" such impacts.

TABLE B-5
IMPACTS FROM COMBINED SOURCES AT OFF-SITE MEIS

Source		Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Impacts				
Project Construction	Unmitigated	**11.06 (infant)**	0.29	0.01
	Mitigated	3.36 (infant)	0.27	<0.01
Cumulative Impacts				
Local Roadways		10.46	0.16	0.02
Lucky #778 (Facility ID #18339, Generator)		<0.01	-	-
Cachita LLC (Facility #112205-1, Gas Dispensing Facility)		0.73	-	0.05
Cumulative Total	Unmitigated	22.25	0.45	<0.09
	Mitigated	14.55	0.43	<0.08
BAAD Cumulative Source Threshold		***>100***	***>0.8***	***>10.0***
Exceed Threshold?	Unmitigated	*No*	*No*	*No*
	Mitigated	*No*	*No*	*No*

Source: Illingworth & Rodkin 2025 (**Appendix D**)

Health risk impacts from the existing TAC sources upon the project site are reported in **Table B-6**. The location of the maximum exposed individual (MEI) is shown in **Figure B-5**. The risks from each TAC source are compared against the BAAD single-source threshold, while the sum of the impacts is compared against the cumulative source threshold. As shown in **Table B-6**, existing sources of TAC emissions do not exceed the BAAD single-source or cumulative-source thresholds for cancer risk, annual $PM_{2.5}$ concentration, or HI.

TABLE B-6
IMPACTS FROM EXISTING TAC SOURCES ON PROJECT SITE RECEPTORS

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Highway 12	3.46	0.15	<0.01
Lucky #778 (Facility ID #18339, Generator)	<0.01	-	-
Cachita LLC (Facility #112205-1, Gas Dispensing Facility)	2.53	-	0.25
BAAD Single-Source Threshold	***>10.0***	***>0.3***	***>1.0***
Exceed Threshold?	*No*	*No*	*No*
Cumulative Total	6.00	0.15	<0.26
BAAD Cumulative Source Threshold	***>100***	***>0.8***	***>10.0***
Exceed Threshold?	*No*	*No*	*No*

Source: Illingworth & Rodkin 2025 (**Appendix D**)

Impact AIR-4: The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people*. (Less than Significant)*

During project construction, some odors may be present due to diesel exhaust. However, these odors would be temporary and limited to the construction period. Once operational, the proposed project would not include any activities that would generate objectionable odors. Therefore, the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. This impact would be ***less than significant***.

Source: *Illingworth & Rodkin, 2025*

Figure B-4
Nearby TAC and $PM_{2.5}$ Sources

Source: *Illingworth & Rodkin, 2025*

Figure B-5
On-Site Residential Receptors, Roadway Model, Stationary Sources, and Maximum TAC Impacts

Impact C-AIR-1: The project, in combination with reasonably foreseeable future development, would not result in a significant cumulative air quality impact. (*Less than Significant with Mitigation*)

As discussed above, regional air pollution is by its very nature largely a cumulative impact. Emissions from cumulative projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional non-attainment of ambient air quality standards. The project-level thresholds for criteria air pollutants are based on levels below which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. Therefore, cumulative criteria air pollutant analysis is presented in Impacts AIR-2 and AIR-3. Impacts AIR-2 and AIR-3 concluded that cumulative criteria air pollutant impacts would be less than significant with mitigation incorporated.

The proposed project and cumulative projects would result in additional emissions of toxic air contaminants, including diesel particulate matter emissions from new vehicle trips and other stationary emissions sources similar to the proposed project diesel generator emissions, as well as diesel emissions from construction activities. As described in Impact AIR-3, above, the proposed project's 366 average daily vehicle trips would be considered minor low-impact sources that do not pose a significant health impact even in combination with other nearby sources. However, the proposed project would involve construction activities that require off-road equipment and could include a backup generator that emit diesel particulate matter and other toxic air contaminants. Therefore, the proposed project would result in a considerable contribution to significant cumulative health risks. This would be a significant cumulative impact. Implementation of **Mitigation Measure AIR-3**, **Construction Equipment with Low Diesel Particulate Matter Exhaust Emissions**, would reduce the proposed project's diesel particulate emissions by 81 percent and would reduce the proposed project's contribution to cumulative health risk impacts to a ***less-than-significant with mitigation*** level.

Mitigation Measure AIR-2: Basic Construction Management Practices

The proposed project's construction applicant and contractor shall comply with the following fugitive dust control best management practices, as recommended by the BAAQMD Basic Construction Management Practices, or as modified before the time of project implementation, for reducing construction emissions of fugitive dust PM_{10} and $PM_{2.5}$:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.

- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Buildings pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

- Publicly visible sign shall be posted with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Mitigation Measure AIR-3: Construction Equipment with Low Diesel Particulate Matter Exhaust Emissions.

The project applicant will implement a feasible plan to reduce DPM emissions by 10 percent such that increased cancer risk from construction would be reduced below BAAD CEQA significance levels as follows:

- All construction equipment larger than 50 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 final emission standards for PM ($PM_{2.5}$ and PM_{10}), if feasible.

- Alternatively, the applicant may develop another construction operations plan demonstrating that the construction equipment used on-site would achieve a reduction in construction diesel particulate matter emissions by 10 percent or greater. Elements of the plan could include a combination of some of the following measures:

    - Installation of electric power lines during early construction phases to avoid use of diesel portable equipment,

    - Use of electrically powered equipment,

    - Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered,

    - Change in construction build-out plans to lengthen phases, and

    - Implementation of different building techniques that result in less diesel equipment usage.

    - Such a construction operations plan would be subject to review by an air quality expert and approved by the City prior to construction.

B.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐

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

Analysis presented in this section is based on the Biological Resources Analysis prepared by Monks and Associates (M&A) (**Appendix E**). M&A reviewed the following biological resource surveys and reports prepared by the project applicant and conducted a site reconnaissance survey on June 20, 2023.

- Biological Technical Memorandum prepared by Analytical Environmental Services on June 9, 2021.
- Tree Inventory Report prepared by Horticultural Associates on August 21, 2021.
- Biological Memorandum prepared by Montrose Environmental on May 17, 2023.

Environmental Setting

The approximately 2.15-acre project site is located on the east side of SR 12 in the City of Sonoma, California. The project site includes a single-family house, with a landscaped lawn and paved driveway accessed from SR 12 in the front and leading to a paved area directly behind the house, and an approximately 1.5-acre ruderal, herbaceous field east of the paved area behind the house. The project site is surrounded by high-density urban development. West of the project site is SR 12 with commercial businesses across the highway, an office park adjacent to the north of the site, and high-density residential neighborhoods to the south and east of the property.

The unpaved area surrounding the main house is dominated by a partially overgrown grassy lawn in the front along SR 12 with ornamental trees, shrubs, and herbs to the north and south of the lawn. Ornamental species observed onsite by the main house and along the driveway to the back of the house include myrtle (*Myrtus communis*), Lily of the Nile (*Agapanthus africanus*), glossy privet (*Ligustrum lucidum*), rosemary (*Rosmarinus officinalis*), and loquat (*Eriobotrya japonica*).

Typically, anthropogenic-influenced communities provide habitat for those animal species adapted to humans and human-induced disturbances. Examples of animals observed onsite that are associated with these communities are California scrub jay (*Aphelocoma californica*), American crow (*Corvus brachyrhynchos*), European starling (*Sturnus vulgaris*) and Northern mockingbird (*Mimus polyglottos*).

The larger portion of the project site is the field east of the paved lot behind the main house. This field is dominated by ruderal, herbaceous species with a few scattered oak trees and a mix of oaks and ornamentals along the wooden fence surrounding the north, east, and south boundaries of the project site. This ruderal herbaceous field supports highly compacted soils. Dominant grass and forb species within this habitat are non-native species such as wild oat (*Avena fatua*), carrot (*Daucus carota*), hare barley (*Hordeum murinum* ssp. *leporinum*), and ripgut brome (*Bromus diandrus*). Subdominants within this community include soft chess (*Bromus hordeaceus*), English plantain (*Plantago lanceolata*), California poppy (*Eschscholzia californica*),

hairy cat's ear (*Hypochaeris radicata*), and wild radish (*Raphanus sativus*). Along the margins of the ruderal herbaceous field are various trees and forb species dominated by ornamental trees, coast live oak (*Quercus agrifolia*), valley oak (*Quercus lobata*), black oak (*Quercus kelloggii*), giant reed grass (*Arundo donax*), and Himalayan blackberry (*Rubus armeniacus*). Although the project site includes many oaks and other trees, the canopy in this habitat was not continuous and was dominated by the ruderal herbaceous vegetation layer.

Ruderal habitats typically provide suitable environments for common animals that are adapted to living in association with humans. Common wildlife species associated with ruderal communities include raccoon (*Procyon lotor*), Botta's pocket gopher, black-tailed jackrabbit (*Lepus californicus*), western fence lizard (*Sceloporus occidentalis*), American crow (*Corvus brachyrhynchos*), European starling (*Sturnus vulgaris*), house sparrow (*Passer domesticus*), and house finch (*Haemorhous mexicanus*).

Impact BIO-1: The proposed project would not 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. (*Less than Significant with Mitigation*)

Special-Status Plants

No special-status plants have been mapped on or adjacent to the project site. However, according to the California Native Plant Society *Inventory of Rare Plants* and the California Department of Fish and Wildlife (CDFW) *California Natural Diversity Database*, a total of nine special-status plant species are known to occur in the region of the project site. Most of these plants occur in specialized habitats such as chaparral and coastal scrub, broadleaf forest, serpentine grassland, and vernal pools.

Considering the excessively disturbed conditions at the project site, special-status plants would not likely occur onsite. The project site could provide a marginally suitable habitat for one special status plant species: congested-headed hayfield tarplant (*Hemizonia congesta* ssp. *congesta*). This annual member of the sunflower family found in valley and foothill grassland, and sometimes on roadsides has no state or federal status. This species blooming season is from April through November. No occurrence of this species was observed onsite during M&A's site visit on June 20, 2023, nor during the survey conducted on June 3, 2021, by the applicant's biologist–Analytical Environmental Services. Therefore, this species is not present on the project site and the proposed development would have no impact on this species.

Special-Status Wildlife

No special-status animal records have ever been mapped on or adjacent to the project site. However, a total of nine special-status animal species are known to occur in the region of the project site. Of these nine species, only three species have any possibility of occurring on the project site:

- Pallid bat (Antrozous pallidus);
- Crotch's bumble bee (*Bombus crotchii*); and
- Western bumble bee (*Bombus occidentalis*).

Pallid bat (*Antrozous pallidus*). The trees and buildings onsite may provide roosting and maternity habitat for special-status bats including the pallid bat. This bat species is designated by the State as a "species of special concern." Demolition and construction activities associated with the proposed project could impact the pallid bat. This could include loss of maternity and/or roosting habitat, death of individual adult bats and/or young. Impact on this bat species would be considered a potentially significant impact. The proposed project would implement **Mitigation Measure BIO-1**, which requires surveys prior to demolition and tree removal and the development of a removal and exclusion plan in coordination with CDFW. With the implementation of **Mitigation Measure BIO-1**, the proposed project impact on pallid bats would be ***less than significant with mitigation incorporated***.

Crotch's bumble bee (*Bombus crotchii*) and Western bumble bee (*Bombus occidentalis)*. The Crotch's bumble bee and Western bumble bee, candidate species under the California Endangered Species Act, have the potential to occur at the project site. Although there are no documented observations of Crotch's or western bumble bee within the project site, until September 2022,[16] there has been no surveying for bumble bee species. The ruderal herbaceous field at the project site provides a potentially suitable underground nesting habitat for the two bumble bee species. Crotch's or western bumble bee colonies or overwintering queens may be present in underground nests in project construction areas. The project's construction activities could adversely affect these species and their habitats, which would result in a potentially significant impact. The proposed project would implement **Mitigation Measure BIO-2**, which requires surveys prior to demolition and tree removal to minimize the potential take of these species. With the implementation of **Mitigation Measure BIO-2**, the project impact on Crotch's and western bumble bee would ***be less than significant with mitigation incorporated***.

Special-Status Birds and Other Nesting Birds. Suitable habitat for nesting birds is present in the trees, shrubs, grasslands, and structures on and adjacent to the site. Red-tailed Hawk (*Buteo jamaicensis*), Cooper's Hawk (*Accipiter cooperii*), and Red-shouldered Hawks (*Buteo lineatus*) are all known from the area and could nest on the project site. Common songbirds (*passerine birds*) could also nest on the project site. All of these birds are protected under the Migratory Bird Treaty Act (50 CFR 10.13) and their eggs and young are protected under California Fish and Game Code Sections 3503 and 3503.5.

Construction of the proposed project could adversely impact special-status birds or other native migratory bird species. Tree removal, demolition, and construction activities may result in the removal of trees that could be used for nesting. If conducted during the nesting season (February 1 to August 31), such activities could directly impact nesting birds. Construction-related disturbance (e.g., noise, vehicle traffic, personnel working adjacent to nesting habitat) could also indirectly impact nesting birds by causing adults to abandon nearby nests, resulting in nest failure and reduced reproductive potential. Project impact to nesting birds would be a potentially significant impact. Implementation of **Mitigation Measure BIO-3** would reduce the project potential impact to nesting birds to a ***less-than-significant level with mitigation incorporated***.

With the implementation of Mitigation Measures BIO-1 and BIO-2, and BIO-3, the impact of the proposed project related to special-status species would be ***less than significant with mitigation incorporated***.

[16] On September 30, 2020, candidacy listing of the Crotch's bumble bee and the Western bumble bee under the California Endangered Species Act was reinstated after a California Court upheld the determination of the California Fish and Game Commission made in June 2019.

Impact BIO-2: The proposed project would not have an 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. (*No Impact*)

There are no riparian habitat or sensitive natural community on the project site that has been identified in local or regional plans, policies, regulations, or by the CDFW or the US Fish and Wildlife Service. Therefore, the proposed project would have ***no impact*** on any riparian habitat, other sensitive natural community.

Impact BIO-3: The proposed project would have no 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. (*No Impact*)

There are no aquatic resources of any kind on the project site. No drainages, scour, swales, or any other hydrological indicators of any kind are located on the site. Therefore, the proposed project would have ***no impact*** on any protected wetlands.

Impact BIO-4: The proposed project would not 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. (*Less than Significant*)

The project site has no aquatic features such as a stream or river that would serve as a wildlife movement corridor. Moreover, the site has been confined with high restrictive fencing and surrounded by high-density urban commercial and residential development. The proposed project would be an urban infill development and development of the project site within the boundaries of the existing fence lines would not impact wildlife movement. Therefore, the proposed project would not adversely impact or interfere with wildlife movement corridors. This impact would be ***less than significant***.

Impact BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (*Less than Significant with Mitigation*)

According to the City of Sonoma's Tree Ordinance, a "protected tree" is any tree designated to be preserved on an approved development plan or as a condition of approval of a tentative map, a tentative parcel map, or other development approval issued by the city.

The City's Tree Ordinance defines a "significant tree" as any tree having a single trunk circumference greater than one and one-half feet (18 inches) at a height of four and one-half feet, except for those located on a single-family residential property or a multifamily residential property (SMC Section 12.08.020). The City Tree Ordinance defines "significant tree, private" as any tree having a single trunk circumference greater than four and one-half feet at a height of four and one-half feet, located on a single-family or multifamily residential property within a front yard or street-side yard setback (SMC Section 12.08.020).

A tree survey of the project site, performed by a certified arborist in December 2023 (Arborist Report in **Appendix E**), recorded 89 trees at the project site. Native trees observed onsite include coast live oak, black oak, and valley oak. Non-native trees observed included glossy privet, Grecian laurel (*Laurus nobilis*), flowering pear (*Pyrus calleryana*), fig (*Ficus carica*), Chinese pistache (*Pistacia chinensis*), Japanese loquat (*Eriobotrya japonica*), shiny xylosma (*Xylosma congesta*), plum (*Prunus domestica*), and edible pear (*Pyrus communis*).

The proposed project would remove 77 trees. Trees to be preserved include the large valley oak tree located at the site entrance. The number of significant trees to be removed may increase slightly once the grading plans are finalized.

Trees that would be preserved may be inadvertently damaged or adversely affected during construction or as a result of long-term changes to drainage patterns, irrigation, exposure, and other factors. Mature oaks and other trees are sensitive to changes in canopy structure, drainage patterns, soil compaction, trenching, landscape irrigation, and other modifications within the root zone. To protect the remaining trees, in particular the large valley oak tree, the proposed project would implement **Mitigation Measure BIO-5,** which would require the preparation of a Tree Protection Plan. The Tree Protection Plan would include specific tree protection measures near grading, construction, and landscape improvements. The protection measures would prevent wounding of trunks and major roots during construction. To ensure the replacement of trees to be removed, **Mitigation Measure BIO-5** requires onsite tree replacement at a 1:1 ratio in compliance with the City's Tree Ordinance. With the implementation of **Mitigation Measure BIO-5**, the proposed project's impact on remaining trees would be ***less than significant with mitigation incorporated***.

Impact BIO-6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. (*No Impact*)

There are no Habitat Conservation Plans or Natural Community Conservation Plans in force in the project area. Therefore, the proposed project would have ***no impact*** on any adopted habitat conservation plan.

Impact C-BIO-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on biological resources. *(Less than Significant)*

Cumulative projects would be subject to the requirements of the federal and State Endangered Species Acts, California Fish and Game Code, and City of Sonoma General Plan policies related to biological resources. These regulations, permit terms and conditions, and General Plan policies would minimize potential adverse impacts to bat species, bumble bee species, and nesting birds to the maximum extent practicable. Therefore, the proposed project in combination with cumulative projects would not have a significant cumulative impact related to effects on special-status species.

Similar to the proposed project, cumulative projects in the City of Sonoma would be required to comply with the City's Tree Ordinance and Heritage Tree Ordinance (City of Sonoma Municipal Code, Chapters 12.08 and 12.09, respectively) and implement appropriate measures. Therefore, the proposed project, in combination with cumulative projects, would not result in significant cumulative impacts related to the Tree Preservation Ordinance. Cumulative project impacts would be ***less than significant***.

Mitigation Measure BIO-1a: Special-Status Bat Species

> In order to avoid impacts on roosting pallid bat or other special-status bats, building or tree removal shall only be conducted during seasonal periods of bat activity: between August 31 and October 15, when bats would be able to fly and feed independently, and between March 1 and April 1st to avoid hibernating bats, and prior to the formation of maternity colonies. A qualified biologist, one with at least two years of experience surveying for bats, shall do preconstruction surveys for roosting bats within 14 days of starting work. If the qualified

biologist finds evidence of bat presence during the surveys, then he/she shall develop a plan for removal and exclusion, in conjunction with the CDFW.

If building or tree removal must occur outside of the seasonal activity periods mentioned above (i.e., between October 16 and February 28/29, or between April 2 and August 30), then a qualified biologist, one with at least two years of experience surveying for bats, shall do preconstruction surveys within 14 days of starting work. If roosts are found, a determination shall be made whether there are young. If a maternity site is found, impacts to the maternity site will be avoided by establishment of a non-disturbance buffer until the young have reached independence. The size of the buffer zone should be determined by the qualified bat biologist at the time of the surveys. If the qualified biologist finds evidence of bat presence during the surveys, then he/she shall develop a plan for removal and exclusion, when there are not dependent young present, in conjunction with the CDFW.

Mitigation Measure BIO-1b: Special-Status Bumble Bees

To minimize the take of Crotch's and western bumble bee species, a qualified entomologist shall conduct a take avoidance survey for active bumble bee colony nesting sites in any previously undisturbed area prior to the start of construction, if the work will occur during the flying season (March through August). Survey results, including negative findings, shall be submitted to the City of Sonoma prior to the start of ground-disturbing activities. Surveys shall take place during the flying season when the species is most likely to be detected above ground. The surveys shall occur when temperatures are above 60 degrees Fahrenheit (°F), on sunny days with wind speeds below 8 miles per hour, and at least 2 hours after sunrise and 3 hours before sunset as these are the best conditions to detect bumble bees. Surveyors shall conduct transect surveys focusing on detection of foraging bumble bees and underground nests using visual aids such as binoculars. At a minimum, a survey report shall provide the following: If no Crotch's or western bumble bees or potential Crotch's or western bumble bees are detected, no further mitigation is required. If potential Crotch's or western bumble bees are seen but cannot be identified, the applicant shall obtain authorization from CDFW to use nonlethal netting methods to capture bumble bees to identify them to species. If protected bumble bee nests are found, a plan to protect bumble bee nests and individuals to ensure no take of Crotch's and western bumble bee species shall be developed by a qualified entomologist in consultation with the City of Sonoma's. The City of Sonoma shall approve the plan prior to implementation.

Mitigation Measure BIO-1c: Nesting Birds

To avoid impacts on nesting birds, a nesting survey shall be conducted within 15 days of starting construction work or tree removal if this work would commence between February 1st and August 31st. The nesting survey shall include an examination of all buildings onsite and all trees onsite and within 200 feet of the entire project site (i.e., within a zone of influence of nesting birds), not just trees slated for removal. The zone of influence includes those areas outside the project site where birds could be disturbed by earth-moving vibrations and/or other construction-related noise.

If birds are identified nesting on or within the zone of influence of the construction project, a qualified biologist shall establish a temporary protective nest buffer around the nest(s). The nest buffer shall be staked with orange construction fencing. The buffer must be of sufficient size to protect the nesting site from construction-related disturbance and shall be established by a qualified ornithologist or biologist with extensive experience working with nesting birds near and on construction sites. Typically, adequate nesting buffers are 75 feet

from the nest site or nest tree dripline for passerine birds and up to 300 feet for sensitive nesting birds, including raptor species known in the region of the project site. Upon completion of nesting surveys, if nesting birds are identified on or within a zone of influence of the project site, a qualified ornithologist/biologist that frequently works with nesting birds shall prescribe adequate nesting buffers to protect the nesting birds from harm while the project is constructed.

No construction or earth-moving activity shall occur within any established nest protection buffer prior to September 1 unless it is determined by a qualified ornithologist/biologist that the young have fledged (that is, left the nest) and have attained sufficient flight skills to avoid project construction zones, or that the nesting cycle is otherwise completed. In the region of the project site, most species complete nesting by mid-July. This date can be significantly earlier or later and would have to be determined by the qualified biologist. At the end of the nesting cycle, fledging from the nest by its occupants, and independence from the nest tree, as determined by a qualified biologist, temporary nesting buffers may be removed, and construction may commence in established nesting buffers without further regard for the nest site.

Mitigation Measure BIO-5: Tree Protection Plan

The project applicant shall retain a certified arborist to oversee the implementation of the following tree protection and tree replacement plans.

Before the start of any clearing, excavation, construction, or other work on the site, every protected tree shall be securely fenced off at the non-intrusion zone. Temporary tree fencing shall be one foot of radius for each one inch of trunk diameter measured at 4.5 feet above adjacent grade. Such fences shall remain continuously in place for the duration of all work undertaken in connection with the development. Fenced areas shall not be used as a storage area or altered or disturbed except as described below:

If the proposed development, including any site work for the development, will encroach upon the non-intrusion zone of a protected tree, construction activities shall adhere to the following guidelines:

- Roots may not be ripped from the ground and then trimmed. They must be trimmed as encountered and this will require the use of a ground man working with a suitable power tool.

- All roots encountered that are two inches or larger in diameter must be cleanly cut as they are encountered by excavating equipment. Pruned and exposed roots greater than two inches in diameter must be protected from desiccation if left exposed for more than 24 hours. Roots must be covered with heavy cloth, burlap, used carpeting, or similar material that has been soaked in water, until trench or excavation has been backfilled.

- In the event that excavation impacts more than 20 percent of the defined non-intrusion zone, supplemental irrigation may be required to offset the loss of roots. Excavation in this case should be directed by the project arborist retained by the project applicant.

- Concrete or asphalt paving shall not be placed over the root zones of protected trees. Artificial irrigation shall not occur within the root zone of oaks.

- Compaction of the soil within the non-intrusion zone of protected trees shall be avoided, if possible.

- Burning or use of equipment with an open flame near or within the non-intrusion zone shall be avoided. All brush, earth, and other debris shall be removed in a manner which prevents injury to the protected tree. Oil, gas, chemicals, or other substances that may be harmful to trees shall not be stored or dumped within the non-intrusion zone of any protected tree, or at any other location on the site from which such substances might enter the non-intrusion zone of a protected tree.

Tree Replacement Plan. Tree replacement shall occur onsite and shall, at a minimum, occur at a 1:1 ratio and a 15-gallon box size for each six inches of tree diameter removed.

B.5 CULTURAL RESOURCES

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

Impact CR-1: The proposed project could cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5. (*Potentially Significant*)

The proposed project has the potential to result in a significant impact on historical resources. Accordingly, this topic is ***potentially significant*** and will be analyzed further and included in the Environmental Impact Report.

Impact CR-2: The proposed project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5. (*Less than Significant with Mitigation*)

This analysis incorporates information in the Archaeological Resources Management Report prepared for the proposed project by Archaeological Resource Services (ARS) on August 21, 2023, and included in **Appendix F**.

ARS conducted a literature search to identify archaeological sites within half a mile of the project area. Records consulted included archaeological base maps, reports, and historical documents. This included material on file at ARS and Northwest Information Center (NWIC) of the California Historic Resources Information System (CHRIS). ARS also consulted data from the Office of Historic Preservation, the National Register of Historic Places, California Register of Historical Resources, and California Historical Landmarks. The NWIC records search identified 19 discovered or recorded archaeological resources within half-mile radius of the project site. None of these resources is within or near the project site.

ARS also conducted a pedestrian field survey of the project site. The pedestrian field survey did not identify any archaeological resources within the project site. No artifacts or potentially significant archaeological features were observed. Soil samples by hand auger showed a consistent stratigraphy of soil across the project site with no indication of any subsurface

deposits or evidence of prehistoric human occupation. The site was likely plowed and used for agriculture.

Although the potential for the discovery of surface artifact concentrations is unlikely to occur, there is still the potential to encounter isolated tools or artifacts. This impact is potentially significant. Implementation of **Mitigation Measures CR-2a** and **CR-2b** would reduce this impact to a ***less-than-significant level with mitigation incorporated***.

Impact CR-3: The proposed project would not disturb any human remains, including those interred outside of dedicated cemeteries. ***(Less than Significant with Mitigation)***

No known human burials have been identified in the project site. Since the site has been developed in the past, ground disturbing activities are likely to have already disturbed or resulted in the discovery of buried human remains that may exist on the site. Nonetheless, it is possible that unknown human remains could be discovered and inadvertently disturbed through ground disturbing construction activities, which would be a significant impact. The project would be required to implement **Mitigation Measure CR-3 Avoid Impact to Human Remains**, which requires halting construction or excavation in the vicinity of discovered human remains and contacting the County coroner. In addition, Mitigation Measure CR-3 includes procedures in compliance with applicable federal and state regulations in the event of unexpected discovery of human remains. With implementation of Mitigation Measure CR-3, potential project impact on human remains would be ***less than significant with mitigation***.

Impact C-CR-2: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts to archaeological resources or human remains. (*Less than Significant*)

In most cases, federal and state laws protect archaeological resources, either through project redesign or by requiring that the scientific data present within an archaeological resource be archaeologically recovered. Furthermore, the cumulative context for archaeological resources and human remains is generally site-specific and limited to the project's construction area. The cumulative projects considered in this analysis are at least 0.5 miles away from the site. For these reasons, the proposed project, in combination with other projects in the area that would also involve ground disturbance, would not result in a cumulatively considerable impact on archaeological resources or human remains and this impact would be ***less than significant***.

Mitigation Measure CR-2a: Worker's Environmental Awareness Program (WEAP)

> The project applicant shall retain an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology (National Park Service 1983) to conduct a Worker's Environmental Awareness Program (WEAP) training for all construction personnel on archaeological sensitivity prior to the commencement of any ground-disturbing activities. The WEAP training shall include a description of the types of cultural material that may be encountered, cultural sensitivity issues, the regulatory environment, and the proper protocol for treatment of the materials in the event of a find.

Mitigation Measure CR-2b: Unanticipated Archaeological Resources

> In the event that archaeological resources are encountered during ground-disturbing activities, work in the immediate area shall be halted and the applicant must notify the City of Sonoma and retain an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983) to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological

testing for CRHR eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by the project, under the direction of the City of Sonoma, the archaeologist shall determine whether additional work, such as data recovery excavation, is warranted to mitigate any significant impacts to historical resources.

Mitigation Measure CR-3: Avoid Impact to Human Remains

As described therein, if human remains are uncovered during future ground-disturbing activities, the project applicant and contractors would be required to halt potentially damaging excavation in the area of the burial and notify the County Coroner and a professional archaeologist to determine the nature of the remains. The coroner would be required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or State lands. If the coroner determines that the remains are those of a Native American, he or she must contact the NAHC by phone within 24 hours of making that determination. Following the coroner's findings, the property owner, contractor or project proponent, an archaeologist, and the Most Likely Descendant designated by the Native American Heritage Commission would determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The Most Likely Descendant would have 48 hours to complete a site inspection and make recommendations after being granted access to the site. A range of possible treatments for the remains, including nondestructive removal and analysis, preservation in place, relinquishment of the remains and associated items to the descendants, or other culturally appropriate treatment may be discussed. The following is a list of site protection measures that shall be employed:

- Record the site with the NAHC and the appropriate Information Center
- Use an open-space or conservation zoning designation or easement
- Record a document with the county in which the property is located.

If the NAHC is unable to identify a Most Likely Descendant or the Most Likely Descendant fails to make a recommendation within 48 hours after being granted access to the site, the Native American human remains and associated grave goods shall be reburied with appropriate dignity at the project site in a location not subject to further subsurface disturbance.

B.6 ENERGY

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

Impact EN-1: The proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. ***(Less than Significant)***

The construction of a residential development with 50 residential units and up to 99[17] residents would increase energy use onsite. The construction of the project would involve standard building practices that are comparable with those of similar developments. As part of the building permit, the project would be required to comply with all applicable local, state, and federal regulations, including energy efficiency standards.

As discussed under topic VIII – Greenhouse Gas Emissions, the proposed project would be consistent with CALGreen standards, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. Furthermore, the 2022 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to achieve energy-efficient performance. Moreover, the proposed project would continue to reduce its use of nonrenewable energy resources as the percentage of electricity generated by renewable resources provided by PG&E continues to increase to comply with state requirements through Senate Bill 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 60 percent of total retail sales by 2030, and 100 percent by 2045.[18] For these reasons, the proposed project would have a ***less-than-significant*** impact related to wasteful or unnecessary consumption of energy resources during construction or operation.

[17] US. Census. QuickFacts. Sonoma City, California. https://www.census.gov/quickfacts/sonomacitycalifornia. Accessed January 8, 2025.
[18] California Energy Commission. 2021. 2021 SB 100 Joint Agency Report, Achieving 100 Percent Clean Electricity in California: An Initial Assessment.

Impact EN-2: The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. ***(Less than Significant)***

Table B-7 summarizes the project's consistency with the applicable policies of the City's General Plan related to energy efficiency and renewable energy.

TABLE B-7
PROJECT COMPLIANCE WITH ENERGY EFFICIENCY GOALS AND POLICIES

Energy Efficiency Goal or Policy	Project Consistency Policy
ER-3.2: Encourage construction, building maintenance, landscaping, and transportation practices that promote energy and water conservation and reduce greenhouse gas emissions.	**Consistent**. The proposed project would be required to comply with CALGreen standards and 2022 Building Energy Efficiency Standards for building efficiency, which include green building practices that promote energy conservation.
Policy ER-3.3: Set an example of sustainability by conserving resources and following green practices in City facilities, services, and projects.	
Policy CE-3.2: Encourage a mixture of uses and higher densities where appropriate to improve the viability of transit and pedestrian and bicycle travel.	**Consistent**. As described in **Section B.17 – Transportation**, project operation would result in less-than-significant impacts related to Vehicle Miles Traveled (VMT). In addition, the proposed project would close the sidewalk gap at the project frontage, and therefore, contribute to the improvement of other transportation modes within the project area.
Policy CE-3.7: Ensure that new development mitigates its traffic impacts.	

Source: City of Sonoma 2006.

As shown in Table B-7, the proposed project would be consistent with applicable energy efficiency goals and policies. Therefore, potential impacts associated with renewable energy and energy efficiency would be ***less than significant***.

Impact C-EN-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. ***(Less than Significant)***

While overall energy demand in California is increasing commensurate with increasing population, the state also is making concerted energy conservation efforts. All new development in the City are required to comply with the latest California Building Code regulations related to energy efficiency regulations and policies, such that energy is not used in a wasteful manner. Therefore, the proposed project, in combination with other cumulative projects, would result in a ***less-than-significant*** cumulative impact related to energy, fuel, and water resources.

B.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☒	☐	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐	☐
iv. Landslides?	☐	☐	☒	☐	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐	☐

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐	☐

The analysis presented in this section is based on the Geological and Geotechnical Assessment prepared for the project site by Stevens Ferrone & Bailey, dated April 14, 2021, as well as other applicable resources.

Impact GEO-1: The 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, 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. (*Less than Significant*)

There are no known active faults on or adjacent to the project site and the site is not within a designated Alquist-Priolo Earthquake Fault Zone. The closest active faults to the project site are the Rodgers Creek Fault located approximately 4 miles to the southwest and the West Napa Fault located approximately 7 miles to the east.[19] In a seismically active area, such as the San Francisco Bay Area, the remote possibility exists for future faulting in areas where no faults were previously known to exist; however, the likelihood of such fault rupture is extremely low. Therefore, this impact would be ***less than significant***.

Impact GEO-2: The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. (*less than Significant*)

As described under **Impact GEO-1** above, the project site is approximately 4 miles northeast of Rodgers Creek Fault and 7 miles west of the West Napa Fault. In addition, according to the U.S.

[19] California Geological Survey, Earthquake Zones of Regional Investigation, 2023, https://maps.conservation.ca.gov/cgs/eqzapp/app/, accessed on August 31, 2023

Geological Survey, the overall probability of a moment magnitude 6.7 or greater earthquake to occur within the San Francisco Bay Area between 2014 and 2043 is 72 percent.[20]

The project site is susceptible to strong seismic ground shaking in the event of a major earthquake caused by a nearby active fault. However, the proposed project would comply with the current standards required by the California Building Code (CBC), which includes requirements for structural design and foundations, including seismic design specifications. As recommended in the Geological and Geotechnical Assessment prepared for the proposed project, the CBC requires site specific geotechnical investigations to evaluate soil stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on soil-bearing capacity, compressibility, liquefaction, and expansiveness. The Geological and Geotechnical Assessment includes recommendations for the site grading, backfilling, and foundations design. The report also recommends exploratory borings, laboratory testing, and geotechnical engineering analyses to provide detailed geotechnical design and construction criteria for the project and to confirm the preliminary recommendations of the Geotechnical Assessment. The City of Sonoma Building Department reviews project plans and soil reports prior to approval of building permits to ensure compliance with CBC requirements related to earthquake-resistant construction. Therefore, the proposed project's impact related to adverse effects from seismic ground shaking would be ***less than significant***.

Impact GEO-3: The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction or landslide. (*Less than Significant*)

The project site is generally flat and not within a mapped landslide zone or within a designated earthquake-induced landslide zone. According to the U.S. Geological Survey, the site is in an area that has been characterized as having very low liquefaction susceptibility. Liquefaction occurs when loose, water-saturated sediments lose strength and fail during strong ground shaking. The Geological and Geotechnical Assessment recommended a further detailed geotechnical analysis to include mitigation measures for site-specific liquefaction, if deemed necessary. The detailed geotechnical analysis would provide detailed drainage, earthwork, foundation, and pavement for use in the design and construction of the project. Although the proposed project would be located in a seismically active area, the City's permit review process would ensure that the project's structural and foundation plans comply with applicable building code provisions and conform to the measures recommended in the project-specific detailed geotechnical investigation. Conformance with the review process and recommendations made by the engineering design review team, would ensure that the proposed project would not exacerbate the potential for seismic-related ground failure, including liquefaction and lateral spreading. Therefore, this impact would be ***less than significant***.

Impact GEO-4: The project would not result in substantial soil erosion or the loss of topsoil. (*Less than Significant*)

Site preparation and excavation activities would disturb approximately 2.15 acres of soil to a depth of up to 12 feet below the ground surface, which would require excavation of approximately 2,000 cubic yards of material, creating the potential for windborne and waterborne soil erosion. Pleistocene alluvial fan deposits (Qof) have been mapped onsite; the deposits are described as sand, gravel, silt and clay.[21] Grading and excavation would expose

[20] U.S. Geological Survey, Uniform California Earthquake Rupture Forecast (UCERF3), Fact Sheet 2015-2009, UCERF3: A New Earthquake Forecast for California's Complex Fault System, March 2015.
[21] Stevens Ferrone & Bailey. 2021. Geological and Geotechnical Engineering Assessment. 19320 Sonoma Highway 12, Sonoma California. April 14.

topsoil on site and could potentially result in erosion. The project applicant would be required to obtain a grading permit, which would require submission of an erosion and sediment control plan. In compliance with the City Development Code (SMC Section 14.20.205), the sediment control plan would include descriptions of dust control measures and stormwater pollution prevention controls that prevent erosion during and after construction. Therefore, impacts related to loss of topsoil or substantial soil erosion would be ***less than significant***.

Impact GEO-5: The project would not require the use of septic tanks or alternative wastewater disposal systems. (*Not Applicable*)

The proposed project would connect to the existing sewer system. There would be no use of septic tanks or alternative wastewater disposal systems for the proposed project. Therefore, this topic is ***not applicable*** to the proposed project.

Impact GEO-6: The project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (*Less than Significant with Mitigation*)

Construction activities would require excavation up to a depth of 12 feet below the ground surface. As discussed above under **Section B.5 - Cultural Resources**, plowed and used for agriculture. Given the relatively shallow depth of ground disturbance and the previous agriculture uses of the project site, it is highly unlikely that previously unknown paleontological resources would be encountered during construction activities. However, ground-disturbing activities always have the potential to result in the discovery of as-yet-unknown paleontological features. The proposed project would implement **Mitigation Measure GE-1** to reduce potentially significant adverse effects on paleontological resources, including fossils and associated contextual data. With the implementation of **Mitigation Measure GE-1**, the project's impacts on paleontological resources would ***be less than significant with mitigation incorporated.***

Impact C-GEO-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on geology, soils, or paleontological resources. ***(Less than Significant)***

Geology, soil, and paleontological impacts are generally site specific and localized. Cumulative projects could require various levels of excavation or cut-and-fill activity, which would affect local geologic conditions and could affect paleontological resources. However, cumulative projects would also be subject to building permit requirements regarding geotechnical review and the state and local building codes. In addition, site-specific geotechnical review and monitoring for paleontological resources would reduce each project's impacts associated with geology, seismic safety, and paleontological resources. Furthermore, site-specific mitigation would be developed, when necessary, based on site conditions. Similar to the proposed project, cumulative projects considered in this analysis and presented in **Section III.3 - Cumulative Impact Analysis**, would be subject to these mandatory seismic safety standards and design review procedures. Compliance with these standards and procedures would ensure that the effects from nearby cumulative projects would be reduced to less-than-significant levels. For these reasons, the proposed project would not combine with cumulative projects in the project vicinity to create a significant cumulative impact related to geology and soils. Therefore, cumulative impacts would be ***less than significant.***

Mitigation Measure GEO-6: Implement Appropriate Measures in Case of Inadvertent Discovery of Paleontological Resources

Before ground disturbance, the project applicant shall retain a qualified paleontologist, as defined by the Society of Vertebrate Paleontology, to instruct construction personnel involved

with earthmoving activities regarding the possibility of encountering fossils, the appearance of fossils that may be unearthed during construction, and proper notification procedures should fossils be encountered. If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work in the vicinity of the resource and notify the project applicant and the City of Sonoma. There shall be no construction work in the area to allow for the recovery of the resource in a timely manner. In coordination with the City of Sonoma, the project paleontologist shall evaluate the resource and prepare a recovery plan compliant with the standards of the Society for Vertebrate Paleontology. The City of Sonoma shall determine which of the recommendations in the recovery plan are necessary and feasible, and these recommendations shall be implemented before construction activities can resume at the site where the paleontological resources were discovered. The City shall be responsible for ensuring that the qualified paleontologist's recommendations regarding treatment and reporting are implemented.

B.8 GREENHOUSE GAS EMISSIONS

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

Impact GHG-1: The project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. (*Less than Significant*)

Greenhouse gas (GHG) emissions and global climate change represent cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the combination of GHG emissions from past, present, and future projects have contributed and will continue to contribute to global climate change and its associated environmental impacts. For this reason, the analysis of the proposed project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions and this section does not include an individual project-specific impact statement.

According to the San Francisco Bay Area Air Quality Management District (BAAQMD), construction represents a very small portion of a project's lifetime GHG emissions." The BAAQMD's GHG "thresholds for land use project are designed to address operational GHG emissions which represent the vast majority of project GHG emissions."[22]

The BAAQMD thresholds[11] include a performance-based threshold; if a project meets all of the following criteria, the project would result in a less than significant GHG impact[23]:

- *Project does not include natural gas and would not result in wasteful, inefficient, or unnecessary energy use;*

22 Bay Area Air Quality Management District, CEQA Thresholds and Guidelines Update. Available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed: August 30, 2023.

23 A project need only demonstrate compliance with one of the thresholds (consistency with a GHG reduction strategy or performance criteria) to find that the project's GHG emissions are less than significant.

- *Project would result in VMT per capita that is 15 percent below the regional average and meet the CALGreen Tier 2 off-street electric vehicle requirement.*

Project operations would rely fully on electricity for energy supply and would not require natural gas. The proposed project would have access to existing utilities and transportation infrastructure, eliminating the need for any utility extension, transportation infrastructure, or energy use associated with such extensions to meet the project's demands. In addition, as discussed in more detail below in **Section B.17 – Transportation**, consistent with the SB 743 VMT target, the proposed project's VMT would be below the significance threshold (see **Section B.17 - Transportation**). Therefore, the proposed project would be consistent with BAAQMD's recommended design features and transportation performance standards. GHG emissions attributable to the proposed project would not result in a cumulatively considerable contribution to the significant cumulative impact of climate change and this impact would be ***less than significant***.

Impact GHG-2: The project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. (*Less than Significant*)

City of Sonoma Climate Emergency Resolution. In June 2020, the City Council adopted a resolution declaring a climate emergency. As a component of this resolution, the City committed to a citywide strategy including: "(1) mitigation: reduce city-wide greenhouse gas emissions to net zero no later than 2030; (2) drawdown/sequestration: supporting effective carbon-negative actions to place carbon underground where it will remain for virtual perpetuity plus supporting similar steps that remove carbon from the atmosphere; and (3) adaptation/resilience: implementing and/or supporting measures to prepare for the inevitable consequences and impacts of a rapidly warming planet…" The resolution set forth the City's intent to evaluate policies, plans, projects, purchases, and priorities, including the City's General Plan, in accordance with the above-noted strategy components. This is an ongoing process and no formal adoption of GHG targets or policies has been incorporated by ordinance or via an update to the City's General Plan.

City of Sonoma Climate Action Plan. The City developed a draft Climate Action Plan that was introduced to the Climate Action Commission in March 2023. On January 17, 2024, the City Council accepted the City's Climate Action Strategies (CAS) designed to reduce GHG emissions from community activities and City government operations. The CAS provides a road map and recommends priority actions to achieve the City's GHG emissions reduction target of net zero GHG emissions by 2030. The CAS recommended actions are also designed to achieve multiple co-benefits such as lowering energy costs, reducing air pollution, supporting local economic development, and improving public health and quality of life.

City of Sonoma Tier 1 Energy Efficiency Requirements. The City adopted and amended the CALGreen energy efficiency requirements to require local compliance with the voluntary Tier 1 of the CALGreen Code, requiring project applicants to verify compliance with CALGreen requirements, as amended by the city, for all building permit applications submitted after January 1, 2020.

Sonoma County Regional Climate Action Plan. The Sonoma County Regional Climate Action Plan, Climate Action 2020 and Beyond,[24] is a countywide collaborative strategy for GHG reductions and climate change resilience adopted by the Regional Climate Protection Authority

[24] Regional Climate Protection Authority (RCPA). 2020. Climate Action 2020 and Beyond. Sonoma County Regional Climate Action Plan – Highlights and Summary.

(RCPA) adopted in July 2016. The RCPA is governed by a 12-member Board of Directors comprised of representatives from the Sonoma County Board of Supervisors and Council Members from each of the nine cities – Cloverdale, Cotati, Healdsburg, Petaluma, Rohnert Park, Santa Rosa, Sebastopol, Sonoma, and Windsor. The strategy contains 13 overarching strategies within local authority to reduce GHG emissions and increase carbon sequestration by 2030.

In California, energy consumption in buildings is regulated by California Code of Regulations, Title 24. Title 24 includes standards that regulate energy consumption for the heating, cooling, ventilation, and lighting of residential and nonresidential buildings. As noted above, the City has adopted and amended CALGreen to require CALGreen+ Tier 1 level of compliance for all new buildings (except Tier 1 Energy Efficiency measures need not be met). The City requires that project applicants verify compliance with CALGreen requirements as amended by the city. The proposed project would be required to comply with the standards of Title 24 and the City CALGreen+ code, which incorporates all mandatory elements of the 2019 CALGreen Code and stricter local requirements in accordance with the CALGreen Tier 1 measures. In addition, the project would comply with the City's Climate Action Strategies. The new buildings would be fully powered by electricity. Also, the project frontage would include a sidewalk connecting to the existing sidewalk on SR 12. Therefore, this impact would be ***less than significant***.

B.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted	☐	☐	☒	☐

emergency response plan or emergency evacuation plan?				
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Impact HAZ-1: The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (*Less than Significant*)

Construction. The proposed project would involve the demolition of the existing onsite single-family home, excavation of up to 2,000 cubic yards, and construction of 50 apartment units in seven residential buildings. Construction activities would require the use and transport of limited quantities of hazardous materials such as fuels and oils, solvents and cleaning solutions, paint and thinners, and other common construction materials. These materials could be released during transport, use, or disposal and could cause a hazard for the public. However, the City would require the project applicant and contractor to implement best management practices as part of grading permit requirements, including hazardous materials management measures, which would reduce short-term construction impacts pertaining to the transport, use, and disposal of hazardous materials.

The project applicant and contractor would be required to comply with Occupational Health and Safety Administration (OSHA) and California Division of Occupational Health and Safety (Cal/OSHA) health and safety requirements, all of which would be specified in the construction contracts. These regulations are effective in reducing potential risks to workers by requiring the contractor to adhere to safety standards and provide safety training to workers. In addition, hazardous materials must be transported to and from the project site in accordance with the Resource Conservation and Recovery Act and U.S. Department of Transportation regulations and disposed of in accordance with the Resource Conservation and Recovery Act at a licensed facility that is permitted to accept the waste. These regulations provide a framework for controlling hazardous waste from cradle to grave, ensuring the safe transport, use, and disposal of hazardous materials during construction. These regulations govern record-keeping of all aspects of the hazardous materials lifecycle, mitigating and cleaning up existing contamination and hazardous materials spills, closing facilities with hazardous waste in place, describing requirements for emergency response, and ensuring that workers are trained to handle hazardous materials and respond appropriately to hazardous materials incidents. Because compliance with existing regulations is mandatory, construction of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. In addition, as noted below in **Section B.10 – Hydrology and Water Quality**, the applicant would be required to submit a site-specific Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would include a description of appropriate BMPs to minimize the discharge of pollutants from the project site.

Operation. Once constructed, the proposed project would likely result in the use of common types of hazardous materials that are typically associated with residential and landscaping uses, such as cleaning products, disinfectants, and solvents. These products are labeled to inform users of their potential risks and provide instruction regarding appropriate handling procedures. However, most of these materials are consumed through use, resulting in relatively little waste.

Therefore, hazardous materials used during proposed project operation would not pose substantial public health or safety hazards resulting from routine use, transport, or disposal.

Therefore, construction and operation of the proposed project would result in a ***less-than-significant*** impact related to the use, transport, or disposal of hazardous materials.

Impact HAZ-2: The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (*Less than Significant*)

Based on a Phase I Environmental Site Assessment prepared for the project site, there is no evidence of presence or likely presence of hazardous substances or petroleum products at the site and no further investigation is recommended.[25]

The proposed project would include demolition of the existing onsite single-family home that was constructed in 1939. Based on the building's date of construction, some of the building materials may pre-date the 1970s ban on the use of asbestos-containing materials (ACMs) and lead-based paint (LBP). An asbestos and lead-based paint survey[26] conducted for the exterior and interior finishes of the single-family home found ACMs in the exterior stucco walls, in the ducts insulation of the heating and ventilation system in the basement and throughout the crawl space under the dwelling, and in the roofing mastics. LBP was detected inside and outside the house including exterior windows, exterior doors, walls, cabinets, ceramic tile, and metal in the kitchen and one bathroom.

The California Department of Toxic Substance Control (DTSC) considers asbestos hazardous and requires removal of ACMs prior to demolition or construction activities that could result in disturbance of these materials. ACMs must be removed in accordance with local and state regulations as well as air district, CAL/OSHA, and California Department of Health Services requirements. Specifically, Section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition, or alteration permits until a project sponsor has demonstrated compliance with the notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The California legislature vests the local air district, in this case the BAAQMD, with the authority to regulate airborne pollutants, including ACMs, through both inspection and law enforcement. The air district is to be notified 10 days in advance of any proposed demolition or abatement work. Any disturbance of ACMs at the project site would be subject to the requirements of the air district Regulation 11, Rule 2, Hazardous Materials—Asbestos Demolition, Renovation, and Manufacturing. The local office of Cal/OSHA must also be notified of asbestos abatement. Asbestos abatement contractors must follow state regulations contained in the CCR Title 8, Section 1529 and Sections 341.6 through 341.14, when their work involves 100 gross square feet or more of asbestos-containing materials. Pursuant to California law, the City of Sonoma would not issue the required permit until the project applicant has complied with the requirements described above.

Additionally, demolition activities could result in LBP disturbance and must therefore comply with the Cal/OSHA lead in construction standard (CCR Title 8, Section 1532.1). This standard requires development and implementation of a lead compliance plan when materials containing lead are disturbed during construction. The plan must describe activities that could emit lead, methods that would be used to comply with the standard, safe work practices, and a plan to

[25] AdvancedGeo, 2021. Phase I Environmental Site Assessment. Montaldo Trust Property, 19320 Highway 12, Sonoma, CA. April 8.
[26] AdvancedGeo, 2023. Pre-Demolition Asbestos and Lead-Based Paint Survey Report. Montaldo Apartments. 19320 Highway 12, Sonoma, California. April 28.

protect workers from exposure to lead during construction. Cal/OSHA would require 24-hour notification if more than 100 square feet of lead-containing material would be disturbed.

Based on mandatory compliance with existing regulatory requirements, the proposed project would not result in a significant hazard to the public or environment from asbestos or lead-based paint.

On the long term, the project landscape would minimize the use of fertilizers, herbicides, and pesticides.[27]

For the reasons discussed above, the proposed project would result in a ***less-than-significant*** impact with respect to the hazards associated with the accidental release of hazardous materials into the environment.

Impact HAZ-3: The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (*Less than Significant*)

There are no schools located within 0.25 miles of the project site. The nearest schools to the project site are Sassarini Elementary School and San Francis Solano School, located approximately 0.60 and 0.66 miles to the southeast, respectively. In addition, given the required compliance with the rules and regulations described above under **Impact HAZ-1 and HAZ-2** above, the project impact on schools would be ***less than significant***.

Impact HAZ-4: The project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment. (*No Impact*)

Based on the Phase I environmental site assessment prepared for the project site, the site is not listed on any governmental databases including the Hazardous Waste and Substances Site List (commonly referred to as "Cortese List"). No hazardous materials or chemicals were observed at the project site during the site reconnaissance. The Phase I environmental site assessment recommended that no additional investigation be conducted.

The proposed project would not create a significant hazard to the public or the environment. Therefore, ***no impact*** would occur.

Impact HAZ-5: The project would not be 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. (*No Impact*)

The nearest airport to the project site is the Sonoma Skypark, located approximately 3.3 miles southeast of the project site. At this distance, the Sonoma Skypark does not result in safety hazards or excessive noise at the project site. The proposed residential buildings would be two to three stories, similar to the buildings in the project area. The proposed project would not be in close proximity to an airport and would not result in safety hazard or excessive noise for people residing in the project area. There would be ***no impact***.

[27] Carlson, Barbee & Gibson, Inc. 2024. Stormwater Control Plan for a Regulated Project. Montaldo Projects. November.

Impact HAZ-6: The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (*Less than Significant*)

Project construction would be contained within the boundary of the project site and no street closures would occur. Design of the proposed buildings, including locations of hydrant water pressures and emergency access, would be reviewed by the Sonoma Valley Fire District and would comply with the City's fire code requirements. Compliance with fire safety regulations would ensure that the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan or expose people or structures to a significant risk of loss, injury, or death involving fires.

Implementation of the proposed project could add incrementally to transportation conditions in the immediate area in the event of an emergency evacuation. As discussed in **Section B.17 - Transportation**, the proposed project contribution to traffic conditions would not be substantial and there would be no significant adverse impacts on transportation conditions. Therefore, the proposed project would not impair the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. This impact would be ***less than significant***.

Impact HAZ-7: The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. (*Less than Significant*)

The project site is located within a developed area of the City of Sonoma and is surrounded primarily by existing development. The site is not within a Wildland Fire Risk Area (WFRA) and does not fall within an area of state firefighting responsibility[28]. The nearest WFRA is located at approximately 0.5 northeast of the project site. The proposed project would develop the project site with seven multi-unit residential buildings. Design of the proposed buildings would be reviewed by the Sonoma Valley Fire District and would comply with the City's fire code requirements. Therefore, the project would not expose people or structures to a significant risk involving wildland fires. This impact would be ***less than significant***.

Impact C-HZ-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to hazards and hazardous materials. *(Less than Significant)*

Impacts from hazards and hazardous materials are generally site specific and typically do not combine with impacts from cumulative projects to result in significant cumulative impacts. Cumulative projects would be subject to the same regulatory requirements as the proposed project. Therefore, large, unexpected releases of hazardous materials of the type that would contribute to significant cumulative impacts are not expected. Compliance with existing regulations pertaining to the treatment and management of hazardous materials would ensure that the proposed project would not combine with cumulative projects in the vicinity to result in a significant cumulative impact. Therefore, cumulative hazards impacts would be ***less than significant***, and no mitigation measures are necessary.

[28] California Board of Forestry and Fire Protection. State Responsibility Area (Viewer): https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1. Accessed September 13, 2023.

B.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in a 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?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

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

Impact HYD-1: The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. (*Less Than Significant*)

The Clean Water Act (CWA) prohibits the discharge of pollutants from point sources to Waters of the U.S. except where those discharges are authorized by a National Pollutant Discharge Elimination System (NPDES) permit. The City's SMC Section 13.32.100 - Stormwater Management and Discharge Control, requires preparation of a Stormwater Pollution Prevention Plan, and the incorporation of best management practices (BMPs) in all new development projects to control the volume, rate, and pollutant load of stormwater runoff. At the City's discretion, monitoring, analysis, and reporting of discharges from any premises to the stormwater conveyance system may be required. Projects must implement BMPs during construction and operation to reduce post-construction impacts to water quality.

Construction. The project site is generally flat. It is located at approximately 0.1 miles west of Sonoma Creek. Site preparation and excavation activities associated with the proposed project would disturb approximately 2.15 acres of soil to a depth of up to 12 feet below the ground surface and would require excavation of up to 2,000 cubic yards of materials. Contaminants from construction vehicles and equipment as well as sediment from soil erosion could increase the pollutant load in runoff being transported to receiving waters during construction, which could adversely affect water quality.

Because the proposed project would disturb more than one acre, the applicant would be required to submit a Notice of Intent (NOI) with the State Water Resource Control Board's (SWRCB) Division of Water Quality under the statewide Construction General Permit. The NOI would include general information on the types of construction activities that would occur on the site. The applicant would also be required to submit a site-specific plan called the SWPPP. The SWPPP would include a description of appropriate BMPs to minimize the discharge of pollutants from the site. Construction-related erosion control and water quality BMPs identified in the SWPPP generally include soil stabilization techniques such as: hydroseeding and short-term biodegradable erosion control blankets; silt fences or some kind of inlet protection at downstream storm drain inlets; post-construction inspection of all drainage facilities for accumulated sediment; and post-construction clearing of all drainage facilities of debris and sediment. Finally, the project applicant would be required to submit a Notice of Termination (NOT) once construction is complete and final stabilization of the site has been achieved.

Pursuant to SMC Section 13.32.100, the required building and grading permit of the proposed project would include the SWPPP submitted under the NOI. The SWPPP would include a sediment and erosion plan that meets all applicable requirements of the City's SMC Section 14.20.205 to reduce the quantity of construction-related pollutants in stormwater runoff discharging from the project site to the maximum extent practicable.

Operations. Pursuant to SMC Section 13.32.100, the proposed project would comply with the latest version of the Bay Area Stormwater Management Agencies Association (BAASMAA) Post-Construction Manual to design and document applicable best management practices that

would reduce discharge of pollutants in stormwater to the maximum extent practicable. Projects within the City are required to address stormwater quality during development review.

In compliance with the BAASMAA manual, the proposed project would reduce long-term water quality impacts using site design and source control measures to keep pollutants out of stormwater. The existing pervious surfaces cover approximately 97.2 percent (2.09 acres or 90,556 square feet) of the project site. The proposed project would result in approximately 70 percent (64,090 square feet) of impervious surface. In compliance with the BASMAA solutions, as part of the proposed stormwater control measures the project site would have a total of five bioretention facilities, totaling 2,650 square feet.[29] The project site would have five drainage management areas. Each bioretention facility would treat runoff generated from a drainage management area. To offset stormwater impacts for the entire impervious surfaces (approximately 64,090 square feet) at a rate of 4 percent of the impervious area, all onsite runoff would be treated by the bioretention facilities areas. With implementation of BAASMAA required design and best management practices, urban stormwater runoff during the project's operational phase, which may contain sediment, trash, organic contaminants, nutrients, trace metals, and oil and grease compounds that can affect receiving water quality, would be collected and filtered before discharging in the City's storm drain at the northeast corner of the project site.

For these reasons, the proposed project's construction and operational activities would not substantially degrade surface water or groundwater quality, violate water quality standards and waste discharge requirements, or conflict with water quality control plan or groundwater management plan. The proposed project would have a ***less-than-significant*** impact on water quality.

Impact HYD-2: The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. (*Less than Significant*)

The depth to groundwater in the vicinity of the subject property is estimated between approximately 4 feet and 16 feet below surface grade (bsg), with an inferred groundwater flow direction towards the southwest.[30]

The Department of Water Resources (DWR) defines groundwater basins based on geologic and hydrogeologic conditions. The project site is located within the Sonoma Valley groundwater sub-basin.[31] Natural recharge in the sub-basin predominantly occurs where stream channels cut into the alluvial fan deposits. Areas of low relief and sufficiently permeable soil also allow for some slow infiltration from precipitation. The project would increase the size of impervious surface at the project site by approximately 61,390 square feet.[32] However, the project site does not include a stream channel. As discussed under **Impact HYD-1** above, the proposed project would include approximately 2,649 square feet of bioretention areas, which would address the treatment and infiltration of surface runoff.

[29] Carlson, Barbee & Gibson, Inc. 2024. Stormwater Control Plan for a Regulated Project. Montaldo Projects. November.
[30] AdvancedGeo, 2021. Phase I Environmental Site Assessment. Montaldo Trust Property, 19320 Highway 12, Sonoma, CA. April 8.
[31] AdvancedGeo, 2021. Phase I Environmental Site Assessment. Montaldo Trust Property, 19320 Highway 12, Sonoma, CA. April 8.
[32] Existing impervious surface is approximately 2,613 square feet. Approximate impervious surface with project implementation would be 64,090 square feet.

Therefore, operation of the proposed project would not substantially deplete groundwater supplies or substantially interfere with groundwater recharge such that sustainable management of the groundwater basin would be impeded, and this impact would be ***less than significant***.

Impact HYD-3: The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite 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 impede or redirect flood flows.(*Less than Significant*)

Runoff at the project site currently flows east over the open field and has overland release in the south corner along the neighboring property.[33] The approximately 2.15-acre project site is generally flat with no surface water features. Impervious surface currently covers approximately 0.3 percent (approximately 0.06 acres) of the project site. Runoff flows east and has an overland release in the south corner along the neighboring property. During a 10-year storm, flow from the project site is estimated at 0.88 cubic feet per second (cfs). Flow from a 100-year storm is estimated at 1.30 cfs.[34]

After construction, the proposed project would produce 2.49 cfs and 3.68 cfs runoff during a 10-year ad 100-year storm event, respectively. The project runoff would discharge into the existing 36-inch storm drain located at the northeastern corner, which was determined to have enough capacity to carry this flow. [35]

As discussed under **Impact HYD-1** above, preparation and implementation of a SWPPP and BMPs, along with the City's requirements for preparation of an Erosion Control Plan, would address project-related impacts during construction in compliance with the NPDES Construction General Permit. Moreover, meeting BASMAA requirements, with incorporation of bioretention facilities and BMPs to control the volume, rate, and pollutant load of stormwater runoff, would address project-related operational impacts and would ensure that the project is designed so that increased stormwater runoff volumes (if any) are properly detained or retained on site and infiltrated into BMP planters or retention, and offsite flooding impacts from redevelopment do not occur. Therefore, this impact would be ***less than significant***.

Impact HYD-4: The project would not result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation. (*No Impact*)

The project site is not within a flood hazard area. The project site is not located in a FEMA flood hazard zone[36] or a city-designated area where stormwater drainage surcharging could result in flooding. Therefore, the proposed project would not impede or redirect flood flows, and there would be ***no impact*** related to flooding.

The project site is not located in tsunami, seiche, or flood hazard zone. Thus, there would be ***no impact*** from pollutants released during inundation.

[33] Cbg. 2024. Memorandum: Post Developed Peak Storm Drain Analysis. 19320 Sonoma Highway. Sonoma. CA. November 18.
[34] Cbg. 2024. Memorandum: Post Developed Peak Storm Drain Analysis. 19320 Sonoma Highway. Sonoma. CA. November 18.
[35] Cbg. 2024. Memorandum: Post Developed Peak Storm Drain Analysis. 19320 Sonoma Highway, Sonoma, CA 95476. November 18.
[36] Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map Number 06097C0937E (FEMA 2008). 2008. https://msc.fema.gov/portal/search. Accessed on August 30, 2023.

Impact HYD-5: The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. (*No Impact*)

As discussed under **Impact HYD-1** above, during construction, BMPs identified in the SWPPP that meet all applicable requirements of the City's SMC Section 14.20.205 would be implemented. In addition, the proposed project would not impede sustainable groundwater management as the project would not utilize groundwater or interfere with groundwater recharge. All onsite runoff would be treated by the bioretention facilities and routed to the City system that was determined to have sufficient capacity to collect and convey the runoff generated by the proposed project.[37] Therefore, construction and operation of the proposed project would have ***no impact*** on the implementation of a water quality control plan or sustainable groundwater management plan.

Impact C-HYD-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on hydrology and water quality. *(Less than Significant)*

Cumulative development in the project area would result in an intensification of land uses in the project vicinity, similar to the proposed project, and could result in an increase in polluted runoff and stormwater discharges. However, other development projects would be subject to the same water conservation and stormwater management regulations that are applicable to the proposed project. Because other development projects would be required to comply with drainage, dewatering, and water quality regulations similar to the proposed project, peak stormwater drainage rates and volumes for the design storm would gradually decrease over time with new development. Therefore, the proposed project, in combination with past, present, and reasonably future projects, would not result in a significant cumulative impact related to hydrology and water quality. Cumulative impacts would be ***less than significant***.

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[37] Cbg. 2024. Memorandum: Post Developed Peak Storm Drain Analysis. 19320 Sonoma Highway. Sonoma. CA. November 18.

B.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Impact LU-1: The proposed project would not physically divide an established community. (*No Impact*)

The project site is located within an urban setting and is largely surrounded by commercial and residential development. As a result, the proposed residential development would not physically divide the community. **No impact** would occur.

Impact LU-2: The proposed project would not cause a significant physical environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (*Less than Significant*)

General Plan Consistency. The project site has a land use designation of "Housing Opportunity" that identifies sites suitable for higher density and affordable development, especially close to commercial centers and mixed-use areas, and is intended to provide opportunities for low and very low-income households. Uses other than housing and associated improvements are not allowed. The designation allows a density of 15 to 25 dwellings per acre with a 36-foot height limit and a maximum of 60 percent lot coverage for residential development. **Table B-8** presents the proposed project's consistency with applicable General Plan policies. As shown in **Table B-8**, the proposed project would be consistent with applicable General Plan policies.

TABLE B-8
SUMMARY OF GENERAL PLAN CONSISTENCY

General Plan Policy		Analysis
Community Development Element		
CD-4.4	Require pedestrian and bicycle access and amenities in all development.	**Consistent**. The proposed project would provide a new sidewalk along the project frontage filling the gap of the existing sidewalk on SR 12.
CD-5.5	Promote higher density, infill development, while ensuring that building mass, scale, and form are	**Consistent**. The proposed project would develop the 2.15-acre site with 50 apartment

	compatible with neighborhood and town character	units with two to three-story residential buildings.
CD-5.6	Pursue design consistency, improved pedestrian and bicycle access, and right-of-way beautification along the Highway 12 corridor	See CD-4.4
Environmental Resources Element		
CD-1.4	Require new development to provide adequate private and, where appropriate, public open space	**Consistent.** The proposed project would include approximately 22,242 square feet of common open space with a total landscaped area of 25,875 square feet, which would result in more than 400 square feet of open space per dwelling unit
CD-2.6	Preserve existing trees and plant new trees	**Consistent.** Among the 89 trees present on the project site, the proposed project would preserve 16 trees including the large valley oak tree located at the front of the site. The proposed project would plant 105 new trees at the project site.
CD-3.2	Encourage construction, building maintenance, landscaping, and transportation practices that promote energy and water conservation and reduce green-house gas emissions	**Consistent**. The proposed project would be required to comply with CALGreen standards and 2022 Building Energy Efficiency Standards for building efficiency, which include green building practices that promote energy and water conservation.
Circulation Element		
CE-1.2	Eliminate gaps and obstructions in the sidewalk system	See CD-4.4
CE-2.1	Promote bicycling as an efficient alternative to driving	**Consistent**. The proposed project would include bicycle parking facilities for every unit that has a car garage. The proposed project would have additional bicycle parking facilities towards the center of the site to the north of the drive aisle.
CE-2.2	Extend the bike path system, with a focus on establishing safe routes to popular destinations	See CD-4.4
CE-2.3	Expand the availability of sheltered bicycle parking and other bicycle facilities	See CE-2.1
CE-2.5	Incorporate bicycle facilities and amenities in new development	**Consistent**. The project site would include walkways connecting the buildings to parking areas, to the common open spaces, and to the public sidewalk along Sonoma Highway. Also, see CE-2.3
Public Safety Element		
PS-1.1	Require development to be designed and constructed in a manner that	**Consistent**. As discussed in **Section B.7 - Geology and Soils**, the proposed project would

	reduces the potential for damage and injury from natural and human causes to the extent possible	comply with the current standards required by the CBC, which includes requirements for structural design and foundations, including seismic design specifications.
PS-1.3	Ensure that all development projects provide adequate fire protection	**Consistent**. The proposed project would meet the city's fire code requirements and design drawings would be reviewed by the Sonoma Valley Fire District.
Noise Element		
NE-1.1	Apply the following standards for maximum Ldn[1] levels to citywide development: - *45 Ldn:* For indoor environments in all residential units.	**Consistent**. The proposed project would comply with the city's noise standards.

Note: [1] Ldn is the Night Average Sound Level and is used to describe the cumulative noise exposure during an average annual day. Ldn does not represent the sound level heard at any particular time but rather represents the total sound exposure.

In addition, the 2023-2031 Housing Element designates the project site as a pending residential project that will have occupancy post June 30, 2022, and will contribute toward addressing the 6th Cycle of the City's regional housing needs allocation (RHNA) (City of Sonoma, 2023). The proposed project would provide 50 residential units, including 13 affordable housing units, and therefore, would be consistent with the City's Housing Element.

As described in **Section II.3 - Proposed Project Characteristics**, the proposed project would exceed the allowable FAR at the project site of 0.70. However, approximately 26 percent of the proposed residential units would be reserved for the below market rates of extremely low income (2 units), very low income (3 units), and low income (8 units). Therefore, in compliance with Government Code Section 65915, the proposed project would be eligible for a 32.5 percent density bonus and allowance of two incentives or concessions and unlimited waivers of the City development standards. As such, the applicant intends to request a concession for exceeding the floor area ratio due to site constraints, with the goal of developing the site with 50 apartment units with associated garage spaces within the minimum allowable dimensions.

The second concession requested by the applicant is for not meeting the private open space requirements of the City's municipal code. The proposed project would provide approximately 503 square feet of common and private open space per residential unit. While the proposed project would be consistent with the requirements of SMC Section 19.40.070 and SMC Chapter 19.34 for the provision of 300 square feet of common open space or a combination of common and private open space, the proposed project would not be consistent with SMC Section 19.40.070 requirement of 150 square feet per unit with a minimum dimension of 7 feet or an inscribed rectangle of 100 square feet. To provide additional private open space, the patios, porches, or decks, would protrude into either required setbacks, required vehicular accessways, or interfere with required emergency access.

The project applicant is also requesting a waiver for not meeting the minimum setback of 5 feet for one of two trash enclosures. The trash enclosure near Building 2 would be approximately setback 2.5 feet from the northern site boundary. The trash enclosure near Building 7 would be 5 feet from the eastern site boundary and would therefore meet the minimum setback.

For the reasons described above, the proposed project impact related to conflict with applicable land use plan, policy, or regulation would be ***less than significant***.

Impact C-LU-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to land use and planning. (*Less than Significant*)

Cumulative projects, including the Verano Hotel and Housing Project and the Hotel Project Sonoma, would be consistent with the City's General Plan. Due to the nature and scope of these cumulative projects, they would not combine with the proposed project in a manner that would result in a conflict with a land use plan, policy, or regulation adopted for the purpose of mitigating an environmental effect. Therefore, the proposed project, in combination with cumulative projects, would not result in cumulative impacts on land use. Accordingly, cumulative impacts related to land use and planning would be *less than significant*.

B.12 MINERAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Impact MIN-1: The proposed project would not result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state, or locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. (*No Impact*)

Under the Surface Mining and Reclamation Act (SMARA), the State Mining and Geology Board (Board) may designate certain mineral deposits as being regionally significant to satisfy future needs. The Board's decision to designate an area is based on a classification report prepared by the California Geological Survey and on input from agencies and the public. The City of Sonoma, including the project site, is not located in a regionally important area of known mineral resources (i.e., mineral resource zone [MRZ]-2) for construction aggregates, and does not have any active aggregate mining operations within the City limits.[38] Therefore, implementation of the proposed project would have ***no impact*** related to the loss of availability of known regionally important mineral resources.

[38] Miller et al., 2005. Mineral Land Classification of Sonoma County for Portland Cement Concrete Aggregate. March.

B.13 NOISE

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

SMC Chapter 9.56, Noise, includes various noise limits intended to protect community residents from prolonged unnecessary, excessive, and annoying sound levels that are detrimental to the public health, welfare, and safety, or are contrary to the public interest. No person may produce, suffer or allow to be produced by any machine, animal or device, or by any other means, a noise level greater than the noise limits shown in **Table B-9**, below for residential, commercial and public properties. For intermittent sound, noise impact is measured by one-second maximum level (Lmax). For constant sound, the average level (Leq) is used. Where two or more noise limits may apply, the more restrictive noise limit governs.

SMC Section 9.56.050 exempts construction noise from the above limits. The section states that construction, alteration, demolition, maintenance of construction equipment, deliveries of materials or equipment, or repair activities shall be allowed as follows:

(1) between 8:00 a.m. and 6:00 p.m., Monday through Friday,
(2) between 9:00 a.m. and 6:00 p.m. on Saturday, and
(3) between 10:00 a.m. and 6:00 p.m. on Sundays and holidays.

Construction noise level at any point outside of the project site boundaries may not exceed 90 dBA.

Table B-9
Noise limits (SMC Chapter 9.56)

Zone	Daytime Limits	Nighttime Limits
Residential Zones	60dBA Intermittent 50 dBA Constant	50 dBA Intermittent 40 dBA Constant
Commercial Zones	65 dBA Intermittent 55 dBA Constant	65 dBA Intermittent 55 dBA Constant

Source: City of Sonoma, 2023

Notes: dbA: A-weighted decibel

Impact NOI-1: The project could generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (*Less than Significant with Mitigation*)

Construction. Demolition and construction activities, including grading, excavation, paving, material deliveries, and building construction, would result in temporary noise in the project area, exposing adjacent sensitive receivers to increased noise levels. The proposed project would include demolition of the single-family home and associated pavements and construction of seven multi-unit residential buildings. Project construction is anticipated to last approximately 26 months. The grading/excavation phase of project construction tends to be the shortest in duration, however, associated heavy equipment create the highest construction noise levels. The proposed project would comply with the City's SMC Chapter 9.56 by restricting construction activities and material deliveries to the hours between 8 a.m. and 6 p.m. Monday through Friday, between 9 a.m. and 6 p.m. on Saturday, and between 10 a.m. and 6 p.m. on Sundays and holidays. The noise level at any point outside of the property plane of the project would not exceed 90 dBA. In addition, also in compliance with the City's municipal code, the project applicant would install sign postings at all site entrances upon commencement of construction to inform all construction workers of the allowable construction hours. Despite its temporary nature, to further reduce project noise levels during construction, the proposed project would implement **Mitigation Measure NOI-1**. With implementation of **Mitigation Measure NOI-1**, noise impact during construction would be ***less than significant with mitigation incorporated***.

Operations. Noise sources associated with project operation would consist of low-speed on-site vehicular noise, landscaping maintenance, general conversations, and mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] units). For the project traffic noise to be noticeable, traffic along SR 12 must double in volume. As described in **Section B.17 – Transportation**, traffic associated with the development of 50 apartment units at the project site would not be substantial and would not result in doubling existing traffic volumes on SR 12. The routine operation of ventilation and HVAC units would not be expected to result in unusual or noticeably loud noises. Therefore, noise impacts associated with project operations would be ***less than significant***.

Impact NOI-2: The project would not generate excessive groundborne vibration or groundborne noise levels. (*Less than Significant*)

The project construction would not involve the use of vibratory rollers or other forms of equipment that would result in excessive vibration levels. In addition, the proposed residential development would not include features or activities that would expose persons to or generate excessive groundborne vibration or groundborne noise levels. Therefore, impacts of the proposed project related to vibration would be ***less than significant***.

Impact NOI-3: The project would not be 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. (*No Impact*)

Because the project site is not located within an airport land use plan or within two miles of a public airport or public use airport, ***no impact*** would occur.

Impact C-NOI-1. The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on noise. *(Less than Significant)*

Construction activities within 0.5 miles of the project site, such as excavation, grading, or construction of other buildings in the area, would occur on a temporary and intermittent basis. Construction noise associated with the proposed project would not substantially increase ambient noise levels at locations greater than a few hundred feet from the project site. Therefore, cumulative construction-related noise impacts from the proposed project would be ***less than significant.***

The cumulative context for construction vibration impacts is the proposed project and the immediate area surrounding the project site. None of the cumulative projects identified in **Section III.3 - Cumulative Impact Analysis**, would be located within 100 feet of the project site. Therefore, the proposed project would not combine with cumulative projects to create a significant vibration impact.

Traffic noise associated with the cumulative projects was found not to result in significant impact along SR 12. Long-term noise levels from the Hotel Project Sonoma generated traffic sources were found not to result in a substantial permanent increase in ambient noise levels (an increase of 3 dBA or greater) and were determined to be less than cumulatively considerable. The Verano Hotel and Housing Project was determined to result in less than significant long-term noise impact. Traffic associated with the proposed project would not be substantial and would not result in doubling existing traffic volumes on SR 12. Therefore, cumulative operation-related noise impacts from the proposed project would not combine with cumulative noise impacts to create a significant long-term noise impact and this impact would be ***less than significant***.

Mitigation Measure NOI-1: Construction Noise

The project applicant shall develop a construction mitigation plan to reduce construction noise levels. The construction mitigation plan would include the following:

- All internal combustion engine-driven equipment shall be equipped with mufflers that are in good condition and appropriate for the equipment;
- All unnecessary idling of internal combustion engines shall be prohibited;
- Construction-related traffic to and from the project site shall be routed via designated truck routes and avoid residential streets where possible;
- As possible, “quiet” models of air compressors and other stationary noise sources shall be used;

- All stationary noise-generating equipment, such as air compressors and portable power generators, shall be placed as far away as possible from adjacent residential and commercial land uses;

- Adjacent sensitive uses shall be shielded from stationary equipment with individual noise barriers or partial acoustical enclosures;

- Staging areas and construction material storage areas shall be located as far away as possible from adjacent land uses;

- The project applicant shall designate a "disturbance coordinator" who will be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be implemented. The telephone number for the disturbance coordinator shall be included on the neighborhood notice and posted at the construction site.

- The project applicant shall hold a pre-construction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise mitigation and practices (including construction hours, construction schedule, and noise coordinator) are completed.

B.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Impact POP-1: The proposed project would not induce substantial unplanned population growth, either directly or indirectly. (*Less than Significant*)

Project construction would take approximately 26 months. The construction workforce would typically consist of a maximum of 18 workers per day, with the number of workers onsite ranging from 5 to 18 on any given day. It is expected that the existing workforce within Sonoma County would accommodate the labor demand created from project construction. Therefore, project construction would not attract many construction workers from outside the region to relocate to the area and would not create substantial demand for additional housing or other facilities and services associated with growth.

The project site has a zoning designation of Housing Opportunity, which provides for a maximum base density of 25 units per acre, plus a density bonus consistent with the parameters of State law. The proposed development would replace the single-family home at the project site with 50 residential units. The proposed number of units is consistent with these allowances. In addition, the residential units developed as part of the project are accounted for in the City's Growth Management Ordinance, which limits residential growth within the City to an average of 165 units per year.[39] The project would result in an increase of approximately 99 people.[40] Lastly, the proposed project would not require the extension of any public streets and would connect to existing utility lines. For these reasons, the proposed project would not induce substantial unplanned population growth in the area. This impact would be ***less than significant***.

[39] City of Sonoma Municipal Code. Division IX. Growth Management. Chapter 19.94 Housing Allocation Process.
[40] US. Census. QuickFacts. Sonoma City, California. https://www.census.gov/quickfacts/sonomacitycalifornia. Accessed January 8, 2025.

Impact POP-2: The proposed project would not displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing outside. (*No Impact*)

The existing single-family house at the project site is vacant. The proposed project would replace the single-family house with 50 apartment units. Therefore, the proposed project would have *no impact* related to displacing substantial number of existing people or housing.

Impact C-POP-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to population and housing. *(Less than Significant)*

Cumulative projects would result in intensification of land uses in the project area, similar to the proposed project. However, these projects would be infill projects and would be consistent with the planning vision for the area, as well as with projected regional and city-wide growth in population, housing, and employment. Therefore, the proposed project in combination with cumulative projects would not result in significant cumulative impact related to population and housing, and the impact would be *less than significant*.

B.15 PUBLIC SERVICES

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

Impact PS-1. The project would not result in an increase in demand for fire protection, police protection, schools, or other services to an extent that would result in substantial adverse physical impacts associated with the construction or alteration of governmental facilities. (*Less than Significant*)

Construction Impacts

Incidents requiring law enforcement, fire protection, or emergency medical services could occur during construction. Responding to such incidents is routine for the police and fire departments as construction projects are common and ongoing throughout the city. Construction of the project would occur over a period of approximately 26 months and would require a maximum of 18 workers onsite on any given day. Any incremental increase in demand for these services during construction would be temporary and would not require construction of new or physically altered facilities to maintain service ratios. Similarly, project construction would not result in the need for new or expanded schools or parks as a result of relocation of construction workers. Therefore, impacts related to the provision of new or altered public service facilities during project construction would be *less than significant*.

Operations Impacts

Fire Protection: Fire protection services within the City are provided by Sonoma Valley Fire District (SVFD). The SVFD provides all-risk fire, rescue, and emergency medical services to the communities of Agua Caliente, Boyes Hot Springs, Mayacamas, Diamond-A, El-Verano, Fetters Hot Springs, Glen Ellen, Kenwood, Temelec, Seven Flags, and the City of Sonoma. The District maintains four career-staffed fire stations and four volunteer-staffed stations, an administrative office, and a maintenance facility. The District staffs six companies: four Paramedic Engine Companies and two ALS Ambulances. The District also staffs an assortment of specialized equipment through the supplemental staffing of 41 dedicated volunteer firefighters. This equipment includes a Ladder Truck, two Rescues, three Water Tenders, and nine additional Fire Engines, including six specialized wildland engines.[41]

The proposed project would not induce growth and demand for services more than what is allowed for through the Growth Management Ordinance. As noted in **Section B.11 – Land Use and Planning**, the project would comply with the designated use and density at the project site. In addition, the project would be within the service area of the existing emergency response facilities. Therefore, it would not require new or physically alter fire department facilities. Access and building orientation are designed to accommodate access of emergency vehicles. In addition, the proposed new residential units would include fire-sprinkler systems. Therefore, the incremental increase in the demand for fire services would be ***less than significant***.

Police Protection: The Sonoma Police Department (SPD), managed by the County Sheriff's Office, is responsible for the area within the City limits and is staffed with 16 employees including one chief, two sergeants, ten patrol deputies, two community service officers, and one administrative staff.[42] The SPD is also supported by a cadre of volunteers and police explorers.

As discussed in **Section B.14 – Population and Housing**, the proposed project would be consistent with designated density and use at the project site. In addition, the increase in population as a result of the proposed project has been accounted for by the City's Growth Management Ordinance. Therefore, the proposed project would not require new or physically altered police department facilities , nor would it induce demand for services in excess of what is allowed through the Growth Management Ordinance or anticipated in the General Plan as a whole. The incremental increase in demand for police services would be ***less than significant***.

Schools: The project site is located within the Sonoma Valley Unified School District (SVUSD), which operates four elementary schools, two middle schools, and two high schools. The proposed project would result in 50 residential units, which would have an incremental increase in student demand on school services. The proposed project would comply with the California Government Code Section 65995 by paying school impact fees to offset the increased demand on school facilities caused by the project. The proposed project would result in a ***less-than-significant*** impact on schools.

Parks: The City recreation system consists of a network of trails and bike paths linking residential areas with open space, neighborhood parks, and community parks totaling approximately 96 acres. In addition, three regional parks and two state parks of approximately 246 acres are within and adjacent to the city limits and easily accessible from the project site. Policy 4.2 of the Environmental Resources Element of the General Plan establishes a minimum

[41] Sonoma Valley Fire District. 2023. District Overview. https://www.sonomavalleyfire.org/district-overview. Accessed on September 13, 2023.
[42] City of Sonoma. 2023. Police. https://www.sonomacity.org/departments/police-department/. Accessed on September 13, 2023.

parkland ratio of 5 acres per 1,000 residents. The City's population is 10,466[43], resulting in a parkland-to-population ratio of 9 acres per 1,000 residents, considering only the parkland under the City's jurisdiction, which exceeds the General Plan requirements. In addition, the proposed project would provide 22,242 square feet of common open space with a total landscaped area of 25,875 square feet, which would result in more than 400 square feet of open space per dwelling unit. Therefore, the incremental increase in usage of city park facilities as a result of the proposed project would be ***less than significant***.

Other Public Facilities: The proposed project would not require the provision or construction of other public facilities, such as libraries, public restrooms, or others. ***No impact*** would occur.

Impact C-PS-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts on police, fire, and school district services such that new or physically altered facilities, the construction of which could cause significant environmental impacts, would be required in order to maintain acceptable levels of service. ***(Less than Significant)***

Cumulative development in the project vicinity would result in an intensification of land uses and a cumulative increase in the demand for fire protection, police protection, school services, and other public services. Similar to the proposed project, cumulative projects would be within the City's projected growth and would be required to pay applicable fees. As a result, projected future development would not result in any service gap in citywide fire, police, emergency medical services, or libraries. Therefore, the proposed project would not combine with cumulative projects to create a significant cumulative impact on public services, and this impact would be ***less than significant***.

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[43] U.S. Census. 2023. https://www.census.gov/quickfacts/fact/table/sonomacitycalifornia,sonomacountycalifornia/HSD310221. Accessed September 11, 2023.

B.16 RECREATION

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

Impact REC-1: The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or such that the project would require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. (*Less than Significant*)

In combination with State and County parks that are maintained within and adjacent to the city limits, the City of Sonoma has approximately 343 acres of parkland and other recreational facilities. As discussed above **Impact PS-1**, city-owned parkland and open space total 96 acres, resulting in a parkland to population ratio of 9 acres per 1,000 residents, which exceeds the minimum ratio established in the City's General Plan of 5 acres of parkland and open space per 1,000 residents. The proposed project would provide approximately 24,164 square feet of common open space and 976 square feet of private patios or decks for a total of approximately 25,140 square feet, which would result in more than 503 square feet of open space per dwelling unit. In addition, the proposed project would result in a total of approximately 28,000 square feet of landscaped area. The size of some of the proposed private patios would not meet the dimensions required by City of Sonoma Municipal Code. The Project Applicant is requesting a concession for not meeting this requirement as described in **Section II.3 - Proposed Project Characteristics**.

The proposed additional 50 residential units would result in an incremental increase of demand on recreational facilities that may result in physical deterioration of these facilities or may require the construction of expansion of recreational facilities. However, considering the small number of units, the available city-owned parkland and open space, and the proposed common open space at the project site, the project increased use of public recreational facilities would be marginal and would note result in the deterioration of these facilities or require the construction of new or expanded recreational facilities. Therefore, the proposed project would not result in a substantial deterioration of recreational facilities This impact would be ***less than significant***.

Impact C-REC-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to recreation. ***(Less than Significant)***

Cumulative projects considered in this analysis would result in an intensification of land uses and a corresponding increase in demand for recreational facilities and resources. As discussed above, city-owned parkland and open space total 96 acres. It is expected that these existing recreational facilities would adequately accommodate the increase in demand for recreational resources generated by nearby cumulative development projects. For these reasons, the proposed project, in combination with cumulative development projects, would not result in a significant cumulative impact on recreational resources. Impacts would be ***less than significant***.

B.17 TRANSPORTATION

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

The analysis presented in this section is based on the Traffic Impact Study prepared for the proposed project by an independent consultant and reviewed by the City's environmental traffic consultant. The Traffic Impact Study and associated reviews and revisions are included in Appendix G.

Impact TR-1: The project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. (*Less than Significant*)

Project construction

Construction activities for the proposed project are expected to span approximately 26 months. The construction workforce is anticipated to generate an average of approximately 36 trips per day throughout most of the construction period. Other preparation and finishing activities may result in between 12 and 30 trips per day. Over the construction period, the proposed project would generate approximately 2,750 truck trips. The main access road to the project site is SR 12. The average daily traffic volume on SR 12 is approximately 10,000 trips.[44] Given that construction activity is anticipated to generate a relatively small number of additional daily trips compared to existing traffic volumes, the overall effect on traffic flow and congestion on SR 12 would be minimal.

[44] Caltrans. Traffic Sensus Program. Traffic Volumes: Annual Average Daily Traffic for all Vehicles on California State Highways. SR12 from Verano Avenue to Petaluma Avenue. Year 2022. https://dot.ca.gov/programs/traffic-operations/census. Accessed on March 4, 2025.

The proposed project would be required to apply for an encroachment permit from Caltrans that would be submitted to the City once approved. The encroachment permit would include a traffic control plan to address potential temporary disruption to pedestrian and bicycle facilities, and public transportation systems. In addition, the encroachment permit would ensure that access points for the project construction phase would be constructed in compliance with City of Sonoma standards and emergency vehicle access to the site would be maintained.

Project Operation

Roadway Facilities. During operation, the proposed project would generate 366 trips per weekday, including 23 trips during the morning peak hour and 28 trips during the evening peak hour. Given the average daily traffic volume on SR 12 is approximately 10,000 trips[45], the additional trips generated by the proposed project would be minimal and are expected to cause a minor delay in traffic on SR 12. The environmental impact of these trips (for transportation purposes) is discussed below under response to **Impact TR-2.**

Bicycle Facilities. Existing bicycle facilities near the project site include Class II bike lane[46] on Verano Avenue between Arnold Drive and SR 12 and Class I[47] Sonoma City Trail between SR 12 and 4th Street East. Planned facilities include Class II bike lanes along SR 12 between Donald Street and West Napa Street, and along Petaluma Avenue and West Napa Street to the South of the project site. Bicyclists ride in the roadway and on the sidewalks walks along other streets within the project area.

The proposed project would provide bicycle parking for every unit with a garage. Additional bicycle parking supply would be provided north of the drive aisle. The proposed project would be consistent with the General Plan Circulation Element Policy CE-2.3, which requires expanding the availability of sheltered bicycle parking. The proposed project would not include any component that would conflict with the existing or planned bicycle facilities.

Pedestrian Facilities. A network of sidewalks, crosswalks, pedestrian signals, and curb ramps provide access for pedestrians in the vicinity of the project site. Pedestrian crosswalk connections are available to the nearby shopping plaza including Maxwell Village located north of the project site and Vineyard Center near the intersection of SR 12 and Verano Avenue. However, sidewalk gaps are present along roadways in the vicinity of the project site. The proposed project would include the construction of a sidewalk along the project frontage, connecting to the existing sidewalk to the north and south (See **Figure B-1**). The proposed improvements to the sidewalk at the project frontage would be consistent with the General Plan Circulation Element Policy CE-1.2, which requires eliminating gaps in the sidewalk systems. The proposed project would not include any other off-site construction activities, and therefore, would not conflict with the existing or planned pedestrian facilities.

Transit Facilities. Sonoma County Transit (SCT) provides fixed route bus service throughout the County of Sonoma including within the City of Sonoma. The nearest transit stops to the project site are located within walking distance (300 feet) on both sides of SR 12. These include transit stops on the west side of SR 12 near the intersection with Ramon Street and at Maxwell Village

[45] Caltrans. Traffic Sensus Program. Traffic Volumes: Annual Average Daily Traffic for all Vehicles on California State Highways. SR12 from Verano Avenue to Petaluma Avenue. Year 2022. https://dot.ca.gov/programs/traffic-operations/census. Accessed on March 4, 2025.
[46] Class II bike lane is classified in the Caltrans Highway Design Manual as a stripped and signed Lane for one-way bike travel on a street or highway.
[47] Class I is classified in the Caltrans Highway Design Manual as a multi-use path completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.

Shopping Center served by Routes 32 and 34. On the east side of SR 12, the transit stop close to the project site is located near Spain Street and is served by Routes 30X, 32, and 34. The location of the project site in close proximity to existing transit service supports General Plan Circulation Element Policy 3.1, which encourages providing a mix of land uses and density that would support increased transit use. The proposed project would not include any component that would conflict with the existing or planned transit facilities, nor would it generate additional demand for public transit that could not be accommodated by existing public transit services.

Based on the discussion above, the proposed project would be consistent with relevant plans and policies related to roadway, bicycle, pedestrian, and transit facilities and this impact would be ***less than significant***.

Impact TR-2: The project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b). (*Less than Significant*)

CEQA Guidelines Section 15064.3, subdivision (b) indicates that land use projects would have a significant impact if the project resulted in vehicle miles traveled (VMT) exceeding an applicable threshold of significance. Consistent with the approach recommended by the Governor's Office of Planning and Research (OPR) in their 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA, this analysis establishes a VMT CEQA significance threshold of 15 percent below the Citywide average residential VMT per resident.

Based on the Sonoma County Transportation Authority (SCTA) travel demand model, the City of Sonoma has a baseline average residential VMT of 28.94 miles per capita. Applying OPR's guidance, a residential project generating VMT that is 15 percent or more below the citywide baseline (28.94 miles per capita), a project resulting in a VMT of 24.60 miles per capita or less, would have a less-than-significant VMT impact.

The project site is located within the traffic analysis zone (TAZ 829), which has a baseline VMT per capita of 26.84 miles. To achieve a VMT per capita below the significance threshold of 24.60 miles, the VMT reduction from the 26.87 miles per capita would be equivalent to at least 8.3 percent. Approximately 26 percent of the proposed 50 apartment units would be affordable. This would result in a VMT reduction of 7.2 percent, based on the SCTA VMT tool estimate. Therefore, to reach the 8.3 percent reduction in the project's VMT, a 1.1 percent VMT reduction is still required.

The proposed project would include 50 apartment units on an approximately 2.15-acre site—resulting in approximately 23 units per acre. Compared to the national suburban average of 9.1 units per acre and based on the reduced number of trips associated with this higher density, the estimated project VMT reduction associated with its density could be as high as 30 percent below baseline VMT level of 26.84 miles per capita, if supporting multimodal infrastructure and parking supply policies are present.

For the purpose of calculating a density-related reduction in VMT, a conservative approach was considered by assuming a project density that is 50 percent lower than its actual proposed level (approximately 11.7 units per acre). Using this more conservative approach, the SCTA VMT tool estimated a 6.2 percent VMT reduction. Therefore, considering the inclusion of affordable units, which would result in a 7.2 percent VMT reduction, and the project density, which would result in at least an additional 6.2 percent VMT reduction, it is reasonable to assume that the VMT generation associated with the proposed project would be at least below the significance thresholds of 24.60 VMT per capita and thus, the impact would be ***less than significant***.

Impact TR-3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). (*Less than Significant with Mitigation*)

The project site would be accessed from SR 12 through a proposed driveway located between the existing building and the large valley oak tree. The speed limit on SR 12 is 30 miles per hour. SR 12 has a two-way left-turn lane along the project frontage. According to the Caltrans *Highway Design Manual*, the minimum stopping sight distance needed is 200 feet for the street conditions. Sight lines to and from the proposed project driveway extend approximately 300 feet to the north and 250 feet to the south. Additionally, there is adequate stopping sight distance for a law-abiding, following driver to notice and react to a preceding motorist slowing to turn right into the project driveway.

Left turns to the project site would be accommodated by the existing two-way left-turn lane on SR 12. However, roadside structures or landscaping could obstruct the line of sight at the proposed project's driveway access. This would be considered a significant impact. The proposed project would implement **Mitigation Measure TR-3,** which would require maintaining roadside structures or landscaping out of the line of sight. With implementation of **Mitigation Measure TR-3**, the impact related to traffic safety and hazard would be ***less than significant with mitigation incorporated***.

Impact TR-4: The proposed project would not result in inadequate emergency access. (*Less than Significant*)

The proposed project would not include modifications to the existing transportation and street network. The proposed driveway and drive aisles would be at least 22 feet wide, which would meet current Sonoma Valley Fire District fire prevention standards and guidelines.

The proposed project is expected to result in approximately 366 trips during the weekdays, including 23 trips during the morning peak period and 24 trips in the evening peak period. Given the average daily traffic volume on SR 12 is approximately 10,000 trips.[48] The additional trips generated by the project would be minimal and are expected to cause a minor delay in traffic on SR 12. In addition, emergency response vehicles have lights and sirens to bypass queued traffic and minimize the effect of intersection delays. Therefore, the proposed project would not substantially affect emergency vehicle response times. Project impacts related to emergency access would be ***less than significant***.

Impact C-TR-1. The proposed project, in combination with cumulative projects, would not result in a significant construction-related cumulative impact on transportation and circulation. *(Less than Significant)*

Localized construction-related transportation impacts could occur when cumulative projects generate increased traffic at the same time and on the same streets as the proposed project. The construction of the proposed project may occur concurrently with construction of one or both cumulative projects considered in this analysis. As discussed in Impact TR-1, the construction for the proposed project would be required to comply with the encroachment permit issued by Caltrans and approved by the City. Also, as discussed in Impact TR-3, the proposed project would implement Mitigation Measure TR-3 to reduce traffic hazards associated with project design. Similarly, each of the cumulative projects would be required to comply with

[48] Caltrans. Traffic Sensus Program. Traffic Volumes: Annual Average Daily Traffic for all Vehicles on California State Highways. SR12 from Verano Avenue to Petaluma Avenue. Year 2022. https://dot.ca.gov/programs/traffic-operations/census. Accessed on March 4, 2025.

encroachment permit requirements and the project's layout would be reviewed by the City traffic engineer. Through the special encroachment permit review process, Caltrans and the City of Sonoma would ensure that project construction, in combination with construction activities associated with the cumulative projects, would not create potentially hazardous conditions for people walking, bicycling, or driving, would not substantially interfere with emergency access and accessibility for people walking or bicycling, and would not substantially delay public transit. As discussed above, additional trips generated by the project would be minimal and would be expected to cause a minor delay in traffic on SR 12. Therefore, the project operation-related traffic would not be cumulatively considerable. Therefore, the proposed project, in combination with the cumulative projects, would result in ***less-than-significant*** transportation-related impacts under cumulative conditions.

Mitigation Measure TR-3: Entryway Features

All monument signs, walls, landscaping, and other vertical features that could otherwise block visibility shall be no more than 3 feet higher than the adjacent driveway elevation in the area within 15 feet behind the back of the sidewalk and within 50 feet of the driveway edge, or as otherwise specified by the City Engineer.

B.18 TRIBAL CULTURAL RESOURCES

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

Impact TCR-1: The project would not result in a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074. (*Less Than Significant with Mitigatiion*)

Assembly Bill (AB) 52 provides for consultation with California Native American tribes during the CEQA environmental review process and equates significant impacts to "tribal cultural resources" with significant environmental impacts. Public Resource Code (PRC) Section 21074 states that "tribal cultural resources" are:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe and are one of the following:
- Included or determined to be eligible for inclusion in the California Register of Historical Resources.
- Included in a local register of historical resources as defined in subdivision (k) of PRC Section 5020.1.

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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

A "historical resource" (PRC Section 21084.1), a "unique archaeological resource" (PRC Section 21083.2(g)), or a "nonunique archaeological resource" (PRC Section 21083.2 (h)), may also be a tribal cultural resource if it is included or determined to be eligible for inclusion in the California Register.

AB 52 also establishes a formal consultation process for California tribes regarding cultural resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency. Following notification of a project, tribes have 30 days to request consultation with the lead agency.

The purpose of consultation is to inform the lead agency in its identification and determination of the significance of tribal cultural resources. If a project is determined to result in a significant impact on an identified tribal cultural resource, the consultation process must occur and conclude prior to adoption of a Negative Declaration or Mitigated Negative Declaration, or certification of an Environmental Impact Report (PRC Sections 21080.3.1, 21080.3.2, 21082.3).

On September 11, 2023, the City of Sonoma sent AB 52 outreach letters to the tribes listed in the contact list provided by the Native American Heritage Commission (NAHC) on June 15, 2023. (**Appendix H**) The letters sent described the project, provided maps of the project site, and invited the tribes to request consultation should they have any concerns. On September 20, 2023, the Federated Indians of Graton Rancheria responded to request formal tribal consultation under the provisions of CEQA (Public Resource Code Section 21080.3.1 subdivisions (b), (d), and (e) for the mitigation of potential project impacts to tribal cultural resources for a project within the Tribe ancestral land. The formal request for consultation noted the following topics: (a) project alternatives; (b) recommended mitigation measures; (c) significant project impacts. In addition, consultation was requested on the following discretionary topics: (a) type of environmental review; (b) significance of tribal cultural resources; (c) significance of the project impact on tribal cultural resources; and (d) alternatives or appropriate measures for preservation or mitigation. On September 22, 2023, the City of Sonoma provided the Archaeological Resource Management Report prepared for the project to the Tribal Heritage Preservation Officer (THPO) of the Federated Indians of Graton Rancheria. On November 3, 2023, the Tribal Heritage Preservation Officer met with the Community Development Director of the City of Sonoma and discussed the proposed development at the project site. On July 12, 2024, the City of Sonoma sent the Notice of Preparation (NOP) of an EIR for the proposed project to the Federated Indians of Graton Rancheria and requested input on the scope and content of the environmental information to be included in the EIR. The City has not received a response from the Tribe on the NOP. As requested by the formal consultation, the City will continue to include the Tribe on all public notifications that are part of the CEQA process and will proceed with the formal consultation when contacted by the Tribe. In addition, pursuant to Public Resources Code § 21080.3.1,(d), if the City is to make a decision with respect to approving the project, the City will provide a formal notification to the designated Tribe contact, 14 days before the decision date.

As discussed in **Section B.5 - Cultural Resources**, the NWIC records search and the archaeological survey completed for the project did not identify evidence of Native American archaeological deposits or ancestral remains, nor has the Federated Indians of Graton Rancheria identified a tribal cultural resource at the project site. As noted in **Section B.5 - Cultural Resources**, implementation of **Mitigation Measures CR-2a, CR-2b,** and **CR-3** would ensure that potential impacts related to previously undiscovered historic or archaeological resources, and human remains which are considered tribal cultural resources, would be ***less-than-significant*** with mitigation.

Impact C-TCR-1. The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on tribal cultural resources. ***(Less than Significant)***

Impacts related to tribal cultural resources are typically site-specific and generally limited to the immediate construction area. There are no other projects in the immediate vicinity that have the potential to affect a tribal cultural resource that might unexpectedly be present on the project site. For these reasons, the proposed project, in combination with cumulative projects, would not result in a cumulative impact on tribal cultural resources. This impact would be ***less-than - significant***.

B.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Impact UT-1: The proposed project would not require or result in the relocation or construction of new or expanded, water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. ***(Less than Significant)***

Potable Water. The project site is served by the City of Sonoma Water Division. The City supplies potable water from Sonoma County Water Agency (SWCA) purchased water and water pumped from groundwater wells owned and operated by the City. The City operates and maintains 4,404 water service connections/meters, 1,437 valves, 476 fire hydrants, six water tanks, eight wells, two booster pump stations, and 58 miles of underground water main pipes.[49]

Wastewater. The Sonoma Valley Sanitation District (SVSD) collects and disposes of the City's wastewater, which is treated at the SVSD Treatment Plant in unincorporated Sonoma on 8th Street East. The SVSD service area covers approximately 4,500 acres and includes the City of Sonoma and the unincorporated areas of Agua Caliente, Boyes Hot Springs, Eldridge, Fetters Hot Springs, Glen Ellen, Schellville, Temelec, and Vineburg. The SVCSD plant treats wastewater from approximately 17,027 equivalent single-family dwellings. The SVSD treatment plant provides tertiary[50] treated wastewater for an average daily capacity of approximately three million gallons of wastewater and 11 million gallons per day of winter flow[51].

Implementation of the proposed project would incrementally increase water demand and wastewater flows from the project site due to the introduction of 50 apartment units. The proposed project would incorporate water-efficient fixtures, as required by Title 24 of the California Code of Regulations (CCR), including the current CALGreen code. Compliance with these regulations would reduce the amount of potable water used for building functions and wastewater flows. The City's infrastructure capacity plans and the SVCSD account for projected population growth. In addition, the proposed project landscaping would be in compliance with the City's Water Efficient Landscape Ordinance and would have an estimated total water usage of approximately 45 percent below the Maximum Allowed Water Allowance (MAWA).[52] For these reasons, the proposed project would not require the construction of new or expansion of existing water or wastewater treatment facilities.

Stormwater. The site currently drains to existing storm drains located within the driveway of the adjacent property to the north, where the flow joins with the City of Sonoma stormwater system. The City's storm drain network flows to Sonoma Creek, Fryer Creek, Nathanson Creek, and Schell Creek .[53]

The proposed project would develop the site with seven residential buildings and result in approximately 64,090 square feet of impervious surfaces. This would result in approximately 69 percent reduction in pervious surface, which would increase the potential stormwater runoff from the site. However, as discussed in **Section B.10 - Hydrology and Water Quality**, the proposed project would comply with the BASMAA solutions and include bioretention areas to offset stormwater impacts of the new impervious surfaces and manage runoff on the site. Proposed project runoff would discharge into the existing 36-inch storm drain located at the northeastern

[49] City of Sonoma 2023. Water Division. https://www.sonomacity.org/water-division/. Accessed on September 5, 2023.
[50] Wastewater goes through three treatment steps before it is considered tertiary recycled water. The tertiary-recycled-water standards (also referred to as advanced water treatment), is the highest level of treatment defined by the State of California (Title 22, Section 60301.230).
[51] SVSD. 2023. https://evogov.s3.amazonaws.com/185/media/165835.pdf. Accessed on September 12, 2023.
[52] City of Sonoma. Water Efficient Landscape Worksheet.
[53] City of Sonoma. 2011. Storm Drain Master Plan. Prepared for City of Sonoma Public Works, Sonoma, CA. Prepared by Winzler&Kelly. May.

corner, which was determined to have enough capacity to carry this flow.[54] This impact would be ***less-than-significant.***

Electricity, Natural Gas, and Telecommunications. The proposed project would rely fully on electric energy and would have ***no impact*** related to natural gas. Electricity would be provided to the project site by PG&E. Telecommunications services would be provided by AT&T, SBC Telecom, or other providers, at the discretion of future tenants. Telecommunications are generally available within and near the project site, and facility upgrades would not likely be necessary. Therefore, the proposed project would have a ***less-than-significant*** impact on local electricity and telecommunications providers.

For these reasons, the utilities demand associated with the proposed project would not exceed the service capacity of the existing providers and would not require the construction of new facilities or expansion of existing facilities. Therefore, this impact would be ***less than significant***.

Impact UT-2: The proposed project and reasonably foreseeable future development would have sufficient water supplies available during normal, dry, and multiple dry years. *(Less than Significant)*

The project site is currently served by the City's existing water service areas. The City's Urban Water Management Plan (UWMP) is based on the growth projections in the City's General Plan. The City's current (2020) UWMP determines that the quantity of existing surface water, groundwater, and recycled water supply sources through 2045 is expected to be adequate for existing and planned development within the City. As described above in **Section B.11 - Land Use Planning**, the proposed project is consistent with the General Plan's Housing Opportunity land use designation. Therefore, while project operation would generate increased water demand, such an increase would be within the increases anticipated in the City's General Plan and UWMP. In addition, the proposed project would be required to comply with the current CALGreen code that includes water conservation features to reduce water demand generated by project operation. In addition, the proposed project landscaping would be in compliance with the City's Water Efficient Landscape Ordinance and would have an estimated total water usage of approximately 45 percent below the Maximum Allowed Water Allowance (MAWA).[55] Therefore, there would be sufficient potable water supply to accommodate the anticipated water demand increases resulting from the proposed project. This impact would be ***less than significant***.

Impact UT-3: The project would not result in a determination by the wastewater treatment provider that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. (*Less than Significant*)

As noted under UT-1 above, the SVSD accounts for projected population growth within the City. Therefore, the treatment plant would have sufficient capacity to serve the proposed project. Therefore, this impact would be ***less than significant***.

Impact UT-4: The proposed project would not result in significant impact related to the generation of solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. (*Less than Significant*)

Solid Waste. Sonoma Garbage Collectors (SGC) manages the trash and recycling services for the City of Sonoma. SGC collects and transports all organic waste from City residences and

[54] Cbg. 2024. Memorandum: Post Developed Peak Storm Drain Analysis. 19320 Sonoma Highway, Sonoma, CA 95476. November 18.
[55] City of Sonoma. Water Efficient Landscape Worksheet.

businesses to the Napa Composting Facility. Nearly all solid waste generated in the County of Sonoma is transported to and disposed of at the Central Disposal Site. Republic Services of Sonoma County, Inc. operates the Central Disposal Site, located at 500 Mecham Road in Petaluma, as well as four smaller transfer stations, located in Annapolis, Guerneville, Healdsburg, and Sonoma.[56] The Central Disposal Site has a permitted capacity of 19.59 million tons (32.65 million cubic yards), a remaining capacity of 9 million cubic yards, and a maximum capacity of 2,500 tons per day (tpd). The estimated site closure date is 2039.[57]

Construction

The proposed project would generate solid waste during demolition and construction activities. Handling of debris and waste generated during construction would be subject to the CALGreen code (Title 24, Part 11 of the California Code of Regulations), which requires that 65 percent of construction and demolition debris be diverted.[58] Compliance with CALGreen would require the preparation of a construction waste management plan that identifies the materials to be diverted from disposal by efficient recycling, reuse, or salvaging. In addition, the CALGreen Code requires that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing be reused or recycled. Therefore, construction activities would not impair the attainment of solid waste reduction goals.

Operation

Project operation would be subject to the City's recycling programs. SGC manages the trash and recycling services for the City of Sonoma. SGC collects and transports all organic waste from the City residences and businesses to the Napa Composting Facility. Nearly all solid waste generated in the County of Sonoma is transported to and disposed of at the Central Disposal Site. Republic Services of Sonoma County, Inc. operates the Central Disposal Site, located at 500 Mecham Road in Petaluma, as well as four smaller transfer stations, located in Annapolis, Guerneville, Healdsburg, and Sonoma.[59] The Central Disposal Site has a permitted capacity of 19.59 million tons (32.65 million cubic yards), a remaining capacity of 9 million cubic yards, and a maximum capacity of 2,500 tons per day (tpd). [60] The estimated site closure date is 2043.[61]

Project operation would increase solid waste generation in the City of Sonoma. The City provides recycling programs through the Sonoma Garbage Collectors, such as curbside recycling of paper, plastics, and bottles, to reduce the volume of solid waste transported to landfills. Project operation would include participation in the City's recycling programs.

[56] County of Sonoma. 2023. Sonoma Public Infrastructure (formerly TPW) Integrated Waste. https://sonomacounty.ca.gov/development-services/sonoma-public-infrastructure-(formerly-tpw)/divisions/integrated-waste/services/disposal-sites. Accessed on September 12, 2023.
[57] CalRecycle. 2023. SWIS Facility/Site Activity Details. Central Disposal Site (49-AA-0001). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1224?siteID=3621. Accessed September 12, 2023.
[58] CalRecycle. 2023. CALGreen Construction Waste Management Requirements. https://calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/newstructures/. Accessed on September 12, 2023.
[59] County of Sonoma. 2023. Sonoma Public Infrastructure (formerly TPW) Integrated Waste. https://sonomacounty.ca.gov/development-services/sonoma-public-infrastructure-(formerly-tpw)/divisions/integrated-waste/services/disposal-sites. Accessed on September 12, 2023.
[60] CalRecycle. 2023. SWIS Facility/Site Activity Details. Central Disposal Site (49-AA-0001). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1224?siteID=3621. Accessed September 12, 2023.
[61] Calrecycle. 2023. Solid Waste Facility Permit. Facility Number: 49-AA-0001. August 1.

Based on CalRecycle, the estimated 2021 annual per capita disposal rate (for the Sonoma County Waste Management Agency) was 4.6 pounds per resident per day.[62] The estimated total population for the proposed project of 102[63] would generate approximately 469 pounds per day of solid waste. The total daily solid waste generation from the proposed project would equate to approximately 0.23 tons per day, which would represent approximately 0.000006 percent of the average daily tonnage accommodated by the Central Disposal Site. Thus, the landfill has sufficient capacity to accommodate the solid waste generated by the project. Furthermore, the proposed project would comply with all local and state regulations related to recycling. Therefore, a ***less-than-significant*** impact would occur.

Impact UT-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste. (*No Impact*)

The California Integrated Waste Management Act of 1989 (AB 939) requires municipalities to adopt an integrated waste management plan to establish objectives, policies, and programs related to waste disposal, management, source reduction, and recycling.

The proposed project would be required to comply with the City's SMC Chapter 7.08, which requires the provision of material-separated receptacles for compost and recycled waste. Project operation would include participation in the City's recycling programs. As part of the City's building permit, the proposed project would be required to follow state and federal regulations related to the disposal of solid wastes, and solid wastes would be transported to a permitted disposal or recycling facility. The proposed project would comply with all applicable local, state, and federal laws and regulations pertaining to solid waste, and there would be ***no impact***.

Impact C-UT-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on utilities and service systems. *(Less than Significant)*

Implementation of the proposed project, in combination with cumulative development in the project area, would result in an incremental increase in water consumption, wastewater generation, and solid waste generation. The City has accounted for such growth in its water demand and wastewater service projections, and has implemented various programs to divert solid waste from landfills. For these reasons, the proposed project would not combine with cumulative projects in the project vicinity to create a significant cumulative impact on utilities and service systems. These impacts would be ***less than significant***.

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[62] CalRecycle.2023. Jurisdiction Per Capita Disposal Trends. Sonoma County Waste Management Agency. https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/ReviewReports. Accessed September 12, 2023.
[63] U.S. Census. 2023. https://www.census.gov/quickfacts/fact/table/sonomacitycalifornia,sonomacountycalifornia/HSD310221. Accessed September 11, 2023.

B.20 WILDFIRE

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Impact WD-1: The proposed project would not impair an adopted emergency response plan or emergency evacuation plan. (*Less than-Significant*)

As part of the building permit, the project design and plans, including site access, would be subject to review and approval by the Sonoma Valley Fire District Fire and would comply with the City's fire code requirements. Therefore, potential project impacts on an adopted emergency response plan or emergency evacuation plan would be ***less than significant***.

The project site is within a developed area within the City of Sonoma, in a Local Responsibility Area. The site is not within a Wildland Fire Risk Area (WFRA) and does not fall within an area of

state firefighting responsibility[64]. The nearest WFRA is located at approximately 0.5 northeast of the project site. The Sonoma Valley Fire District Fire currently serves the project site and would continue to provide these services after the site is developed. The proposed project would develop the project site with seven multi-unit buildings. The proposed project would be required to comply with standards of Chapter 7A of the California Building Code for the inclusion of fire-resistant ratings of buildings components, such as firestops, shaft enclosures, partitions, smoke barriers, floors, fire-resistive coatings, and sprayed fire-resistant materials, among other items. The proposed project would not alter or block adjacent roadways, and implementation of the proposed project would not be expected to impair the function of nearby emergency evacuation routes. In addition, operation of the proposed project would not cause permanent alterations to vehicle circulation routes and patterns or impede public access or travel upon public rights-of-way. Design of the proposed buildings, including consistency with ingress and egress requirements and other applicable requirements, would be reviewed by the Sonoma Valley Fire District Fire and would comply with the City's fire code requirements. Therefore, potential project impact on an adopted emergency response plan or emergency evacuation plan would be ***less than significant***.

Impact WD-2: The proposed project would not exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. (*Less than Significant*)

Construction of the proposed project would involve the use of some flammable materials such as gasoline, diesel fuel, hydraulic oils, paints, solvents, or other wastes. During construction, there would be increased human activity and ignition sources, including equipment that could create spark, be a source of heat, or leak flammable materials on the project site. However, all construction equipment would be required to have fire suppression equipment (such as a fire extinguisher) on board or at the work site; secondary containment would be required for fuel-powered equipment, and a spill kit would be required to be kept on-site during construction for use in case of any leaks or spills of flammable materials. These existing requirements would reduce the potential exacerbation of wildfire risks related to construction activities.

Project operation would be consistent with the allowable zoning for the project site. As noted under Impact WD-1, above, the proposed project would be required to comply with standards of Chapter 7A of the California Building Code. The proposed project would also be subject to requirements in Section 13000 et seq. of the California Health and Safety Code, California Building Standards Code, and California State Fire Code, which include regulations concerning the following: building standards for fire protection, fire protection and notification systems such as extinguishers and smoke alarms, safety for firefighters and emergency responders during emergency operations, minimum standards for hazardous vegetation and fuel management, defensible space, and building construction, and minimum standards for emergency access and water supply for fire response. Compliance with these existing regulatory requirements would ensure that the proposed project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be ***less than significant***.

[64] California Board of Forestry and Fire Protection. State Responsibility Area (Viewer): https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1. Accessed September 13, 2023.

Impact WD-3: The proposed project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment (*Less than Significant*)

The proposed project involves the demolition of the existing single-family house and the construction of seven apartment buildings containing 50 residential units. The proposed project would include connections to existing utility facilities including water, sanitary sewer, storm drainage, electricity, and telecommunication infrastructure. Utility connections would be constructed in conformance with City standards as described in **Section B.19 - Utilities and Service Systems**. The project does not propose the installation or maintenance of any new roads, fuel breaks, emergency water sources, power lines, or other utilities that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Impacts would be ***less than significant***.

Impact WD-4: The proposed project would not 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. (*Less than Significant*)

Project construction would require the preparation of a SWPPP, as discussed in **Section B.10 - Hydrology and Water Quality**. The SWPPP would include Best Management Practices (BMPs) and erosion control measures to be used during construction to manage runoff flows. Additionally, as discussed in **Section B.10 - Hydrology and Water Quality**, the proposed project would include bioretention facilities on site that would manage all project runoff. Furthermore, the project site is not located within a flood zone or within an area identified as having potential for landslides. Therefore, the proposed project would not have the potential to expose people or structures to downslope or downstream flooding or landslides. This impact would be ***less than significant***.

Impact C-WD-1: The proposed project would not substantially contribute to significant cumulative wildfire impact. (*Less than Significant*)

As discussed under WD-1 above, the proposed project is not within a Wildland Fire Risk Area (WFRA) would not exacerbate wildfire risks and contribute to the exacerbation of wildland fire hazards. Therefore, the proposed project impact on the risk of wildfire would not be cumulatively considerable and this impact would be ***less than significant***.

B.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

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

As noted in **Section B.4 - Biological Resources**, impacts to special status plants and wildlife could be potentially significant and therefore **Mitigation Measures BIO-1a, BIO-1b, BIO-1c, and BIO-5** would be required to reduce potential impacts to migratory nesting birds, special-status bat, and bumble bee species. Required mitigation measures would also protected trees remaining at the project site and ensure the replacement of trees to be removed. Incorporation

of these mitigation measures would reduce impacts on biological resources to a ***less-than-significant*** level.

As noted under **Section B.5 – Cultural Resources**, **Mitigation Measures CR-2a** and **CR-2b**, and **CR-3** would ensure that unanticipated archaeological resources and human remains encountered during construction activities would be properly protected and project impact on archaeological resources would be ***less than significant***.

As noted under **Section B.7 – Geology and Soils**, **Mitigation Measure GEO-6** would ensure that unanticipated paleontological resources encountered during construction activities would be properly protected. These measures would reduce the proposed project's potentially significant impact on paleontological resources to a ***less-than-significant*** level.

For these reasons, the proposed project's potential impact on degrading the quality of the environment would be ***less than significant with mitigation incorporated***.

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

The proposed project, in combination with cumulative projects, as described in **Section B.1 – Aesthetics** through **Section B.20 – Wildfire**, would not result in significant cumulative impacts on, aesthetics, agriculture and forest resources, archaeological resources and human remains, air quality, biological resources, energy resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, recreation, public services, transportation, tribal cultural resources, utilities and service systems, or wildfire.

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

Effects to human beings are generally associated with air quality, noise, traffic safety, geology/soils, and hazards and hazardous materials. As described in **Section B.3 – Air Quality**, the proposed project would result in a significant impact related to air pollutants and health risk. These impacts would be less than significant with implementation of **Mitigation Measures AIR-2: Basic Construction Management Practices**, **and AIR-3: Construction Equipment with Low Diesel Particulate Matter Exhaust Emissions**. As described in **Section B.13 – Noise**, the proposed project would result in construction-related noise impact. The impact would be less than significant with implementation of **Mitigation Measure NOI-1: Construction Noise**. Therefore, the proposed project would not cause substantial adverse effects on human beings, either directly or indirectly, with the implementation of **Mitigation Measures AIR-2, AIR-3**, and **NO-1**.

C. LIST OF PREPARERS

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