

MONTALDO APARTMENTS PROJECT
Final Environmental Impact Report
RESPONSES TO COMMENTS
City of Sonoma

August 2025



August 2025

Montaldo Apartments Project Final Environmental Impact Report

City of Sonoma

SCH No. 2024070476

Prepared for:

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Sonoma, California 95476

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1. INTRODUCTION

The City of Sonoma (City) prepared an environmental impact report (EIR) to evaluate the potential environmental effects of the proposed Montaldo Apartments Project (referred to hence forth as the project or proposed project) in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations Section 15000 et seq.).

1.1 Input on the Draft EIR

To assist the City in determining the focus and scope of analysis for this EIR, pursuant to the provision of Section 15082 of the CEQA Guidelines, the City circulated a Notice of Preparation (NOP) on July 12, 2024, to government agencies, special service districts, organizations, and individuals with an interest in or jurisdiction over the proposed project. The NOP is a brief notice sent by the lead agency to inform the public, interested parties, responsible agencies, trustee agencies, and potentially affected federal, state, and local agencies that the lead agency plans to prepare an EIR. The NOP also seeks comments regarding the scope and content of the EIR. The City held a public scoping meeting for the project on August 1, 2024 to solicit additional input.

1.2 Public Review of the Draft EIR

The Draft EIR was circulated for a 45-day public review period beginning on May 12, 2025, and concluding on June 25, 2025, during which agencies and the public submitted public comments and input. Detailed information related to the Montaldo Apartments Projects and this EIR are available at the City of Sonoma City Hall and online at the project webpage: <https://www.sonomacity.org/montaldo-apartments/>

In accordance with Section 15088 of the CEQA Guidelines, the City, as the lead agency, has reviewed the comments received on the Draft EIR, and has prepared written responses to the comments received.

1.3 Organization of the Responses to Comments

The City has prepared this Response to Comments document, which includes:

- A full list of agencies, organizations, and individuals that provided comments on the EIR in Chapter 2 of this Responses to Comments document;
- Comments and responses to comments on the Draft EIR in Chapter 2 of this Responses to Comments document;

- Minor revisions to the Draft EIR detailed in Chapter 3, “Errata,” of this Responses to Comments document;¹ and
- Mitigation Monitoring and Reporting Program

Chapter 2, “Comments and Responses to Comments” includes the written comments received on the EIR and responses to these comments (as required by the CEQA Guidelines Section 15132). The range of responses include providing clarification on the EIR, making factual corrections, explaining why certain comments may not warrant further response, or simply acknowledging the comment for consideration by decision makers when the comment does not relate to the adequacy of the EIR for addressing potential adverse physical environmental effects of the proposed project.

In some instances, responses to comments may warrant modification of the text of the EIR. In those cases, the text of the EIR is revised and the changes compiled in Chapter 3, “Errata”. The text deletions are shown in ~~strikeout~~ (~~strikeout~~), and additions are shown in underline (underline). The revisions presented in Chapter 3 of this Final EIR do not change any of the impact conclusions presented in the EIR, do not require any change to mitigation measures, and do not change the conclusions related to the alternatives analysis or cumulative analysis as presented in the EIR.

This Response to Comments document and the Draft EIR together constitute the Final EIR that the Planning Commission will consider.

1.4 Use of Final EIR

The Final EIR allows the public and the City decision makers an opportunity to review revisions to the EIR and the Responses to Comments. The Final EIR serves as the environmental document to inform the City Planning Commission’s consideration of the proposed project, or one of the alternatives to the project discussed in the EIR.

As required by Section 15090(a)(1)-(3) of the CEQA Guidelines, a lead agency, in certifying a Final EIR, must make the following three determinations:

1. The Final EIR has been completed in compliance with CEQA.
2. The Final EIR was presented to the decision - making body of the lead agency, and the decision - making body reviewed and considered the information in the Final EIR prior to approving the project.
3. The Final EIR reflects the lead agency’s independent judgment and analysis.

As required by Section 15091 of the CEQA Guidelines, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or

¹ Chapter 3, “Errata,” includes only pages of the Draft EIR where revisions have been made.

more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record.

The possible findings are:

1. Changes or alterations have been required in, or incorporated into the project, which avoid or substantially lessen the significant environmental effect, as identified in the Final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

COMMENTS AND RESPONSES TO COMMENTS

2. COMMENTS AND RESPONSES TO COMMENTS

This section contains comment letters received during the public review period for the Montaldo Apartments Project Draft EIR. In conformance with California Environmental Quality Act (CEQA) Guidelines Section 15088(a), the City has prepared written responses to comments related to potentially adverse environmental effects of the proposed project, as well as topics raised by commenters that are unrelated to environmental impacts under CEQA.

2.1 Comments Letters on the Montaldo Apartments Project EIR

Table 2-1 identifies a label for each comment letter received, the author of the comment letter, and the date of the comment letter.

Table 2-1 Comments Received on the Montaldo Apartments Project Draft EIR

Letter Number	Commenter	Date
A1	California Department of Transportation (Caltrans)	6/25/2025
I1	Joanie Bourg	6/24/2025
I2	Cheryl Taylor	5/23/2025

2.2 Comments and Responses to Comments

This section contains the comment letters received during the public review period for the Montaldo Apartments Project Draft EIR and the City's responses to these comments.

Comment Letter A1

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



June 25, 2025

SCH #: 202407476
GTS #: 04-SON-2024-01010
GTS ID: 33356
Co/Rt/Pm: SON/12/36.314

Diane Levine, Associate Planner
City of Sonoma
No.1 The Plaza
Sonoma, CA 95476

Re: Montaldo Apartments Project – Draft Environmental Impact Report (DEIR)

Dear Daine Levine:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Montaldo Apartments Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the May 2025 DEIR.

A1-1

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Project Understanding

The proposed project would construct 50-unit apartment complex within 2 two-story buildings and 5 three-story buildings, with 25 percent affordability component comprised of two extremely low-income units, three very low-income units, and eight low income-units. This project is located directly adjacent to State Route (SR) 12.

A1-2

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide ([link](#)).

A1-3

The project VMT analysis and significance determination are undertaken in a manner consistent with the Office of Land Use and Climate Innovation's (LCI) Technical Advisory or the City/County's adopted VMT policy. Per the DEIR, this project is found to have a less than significant VMT impact.

A1-3

Please note that on page 15 of Appendix D, "the average daily traffic" for Highway 12 should be the annual average daily traffic.

Hydrology

Please ensure that any increase in storm water runoff to State Drainage Systems or Facilities be treated, contained on project site, and metered to preconstruction levels. Existing flow patterns should be maintained.

A1-4

Project Coordination

Please note that coordination with a Caltrans' project may be needed. Caltrans has proposed a collision reduction project on SR 12 near Boyes Hot Springs, from 0.21 miles north of Verano Avenue to 0.15 mile south of the Lomita Ave within postmiles 35.75 to 36.10. This project would add an exclusive left-turn lane on westbound Verano Avenue, remove the existing right-turn slip lane and construct a protected intersection, upgrade existing traffic signal to a modern traffic signal system, install enhanced permanent safety lighting at the Verano Avenue intersection, install a speed feedback sign and audible accessible pedestrian signals (APSs) on all approaches to the Verano Avenue intersection, and install Americans with Disabilities Act (ADA) compliant curb gaps from Harley Street to Donald Street on SR 12. Construction is scheduled to begin in Spring 2027 with 250 working days.

A1-5

Construction-Related Impacts

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

A1-6

Lead Agency

As the Lead Agency, the City is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

A1-7

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet ADA Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

A1-8

Encroachment Permit

Please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway Rights-of-Way (ROW) requires a Caltrans-issued encroachment permit.

The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist ([link](#))
- Caltrans Encroachment Projects Processes – Information Video ([link](#))
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual ([link](#))

A1-9

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects requiring exceptions to design standards, exceptions to encroachment policies, or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Melissa Hernandez, Associate Transportation Planner via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Diane Levine, Associate Planner
June 25, 2025
Page 4

Sincerely,

A handwritten signature in black ink, appearing to read "Luo Yunsheng". The signature is fluid and cursive, with the first name "Luo" and last name "Yunsheng" clearly distinguishable.

YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

Responses to Comment Letter A1

Comment A1-1: Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Montaldo Apartments Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the May 2025 DEIR.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Response to Comment A1-1: The City appreciates the commenter's review of the Draft EIR. This comment does not pertain to the adequacy or completeness of the environmental analysis contained in the RDEIR; the comment is noted.

Comment A1-2: The proposed project would construct 50-unit apartment complex within 2 two-story buildings and 5 three-story buildings, with 25 percent affordability component comprised of two extremely low-income units, three very low-income units, and eight low income-units. This project is located directly adjacent to State Route (SR) 12.

Response to Comment A1-2: This comment does not pertain to the adequacy or completeness of the environmental analysis contained in the RDEIR; the comment is noted.

Comment A1-3: With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide ([link](#)).

The project VMT analysis and significance determination are undertaken in a manner consistent with the Office of Land Use and Climate Innovation's (LCI) Technical Advisory or the City/County's adopted VMT policy. Per the DEIR, this project is found to have a less than significant VMT impact.

Please note that on page 15 of Appendix D, "the average daily traffic" for Highway 12 should be the annual average daily traffic.

Response to Comment A1-3: As noted on page 76 of the Initial Study (Appendix A of the Draft EIR), the traffic analysis is based on the Traffic Impact Study and associated reviews included in Appendix G of the Draft EIR. As requested in this comment, guidance provided by the California Governor's Office of Planning and

COMMENTS AND RESPONSES TO COMMENTS

Research in the publication Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory, 2018 was used in the analysis (Page 13 of the Traffic Impact Study in Appendix G of the Draft EIR).

Thank you for noting the correct type of the average daily traffic on Highway 12 used in the Health Risk Analysis (Appendix D of the Draft EIR). This has been corrected, as noted in Chapter 3, Errata, of this document. This revision does not affect the analysis or the conclusion made in the Health Risk Analysis or the Draft EIR.

Comment A1-4: Please ensure that any increase in storm water runoff to State Drainage Systems or Facilities be treated, contained on project site, and metered to preconstruction levels. Existing flow patterns should be maintained.

Response to Comment A1-4: As discussed in Section B.10 Hydrology and Water Quality of the Initial Study (Appendix A of the Draft EIR) on page 55 through page 59, the proposed project stormwater management design would comply with the Bay Area Stormwater Management Agencies Association (BASMAA) Post-Construction Manual to control the volume, rate, and pollutant load of stormwater runoff resulting from project-related operational impacts and to ensure that the project is designed so that increased stormwater runoff volumes (if any) are properly detained or retained on site and infiltrated into planters or retention, and offsite flooding impacts from redevelopment do not occur.

As discussed on Page 57 of the Initial Study, 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. 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.

Comment A1-5: Please note that coordination with a Caltrans' project may be needed. Caltrans has proposed a collision reduction project on SR 12 near Boyes Hot Springs, from 0.21 miles north of Verano Avenue to 0.15 mile south of the Lomita Ave within postmiles 35.75 to 36.10. This project would add an exclusive left-turn lane on westbound Verano Avenue, remove the existing right-turn slip lane and construct a protected intersection, upgrade existing traffic signal to a modern traffic signal system, install enhanced permanent safety lighting at the Verano Avenue intersection, install a

COMMENTS AND RESPONSES TO COMMENTS

speed feedback sign and audible accessible pedestrian signals (APSS) on all approaches to the Verano Avenue intersection, and install Americans with Disabilities Act (ADA) compliant curb gaps from Harley Street to Donald Street on SR 12. Construction is scheduled to begin in Spring 2027 with 250 working days.

Response to Comment A1-5: Thank you for providing the details of the proposed improvements of the intersection of Verano Avenue and SR 12. The Draft EIR analysis have considered the Verano Hotel and Housing Project in the cumulative projects analysis. The Caltrans' road improvements as noted in the comments have been added to the cumulative projects and cumulative analysis have been updated as needed and is presented in Chapter 3, Errata, of this document. Updates to the cumulative projects and cumulative analysis have not changed the conclusion and the determination presented in the Draft EIR.

The City of Sonoma appreciates the request for coordination and will follow up with Caltrans for coordinating the project construction schedule. Thank you for providing the construction schedule of the road improvements project. As noted in Draft EIR (page 76 of the Initial Study in Appendix A), 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.

Comment A1-6: Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

Response to Comment A1-6: As described in Section B.17, Transportation of the Initial Study (Appendix A of the Draft EIR) on page 77, the proposed project would be required to apply for an encroachment permit from Caltrans that would be submitted to the City once approved. The City will incorporate into the Conditions of Approval to obtain the required permits and plans from Caltrans prior to issuance of the building permit and any requirements issued by Caltrans, such as the preparation of a Transportation Management Plan.

Comment A1-7: As the Lead Agency, the City is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities

COMMENTS AND RESPONSES TO COMMENTS

and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Response to Comment A1-7: The City acknowledges that applicable project mitigation, as well as the project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring are the responsibility of the City. The Draft EIR comprehensively evaluates all adverse physical environmental effects associated with the proposed project, and there is no need to evaluate effects to the highway roadways surface itself as a part of the City's environmental review. The proposed project would provide a pedestrian sidewalk fronting the project frontage that would fill the sidewalk gap at the project frontage along SR 12 and repair all roadway surfaces as required by Caltrans and City of Sonoma.

Comment A1-8: If any Caltrans facilities are impacted by the project, those facilities must meet ADA Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Response to Comment A1-8: The City acknowledges that if any Caltrans facilities are impacted by the project, those facilities would be required to meet ADA standards after project completion, which would be verified by the City staff. The project does not propose any aspect of the state highway system. As noted under Response to Comment A1-7 above, the project would provide a pedestrian sidewalk fronting the project frontage that would fill the sidewalk gap at the project frontage along SR 12. In addition, the City would maintain bicycle and pedestrian access during construction.

Comment A1-9: Please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway Rights-of-Way (ROW) requires a Caltrans-issued encroachment permit.

The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist ([link](#))

COMMENTS AND RESPONSES TO COMMENTS

- Caltrans Encroachment Projects Processes - Information Video (*link*)
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 - The Permit Function, Caltrans Encroachment Permit Manual (*link*)

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects requiring exceptions to design standards, exceptions to encroachment policies, or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits (*link*).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Melissa Hernandez, Associate Transportation Planner via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website (*link*) or contact LDR-D4@dot.ca.gov.

Response to Comment A1-9: The City acknowledges that construction work associated with the project within the Caltrans right-of-way would require an encroachment permit. As noted under Response to Comment A1-6 above, the proposed project would be required to apply for an encroachment permit from Caltrans that would be submitted to the City once approved. The City appreciates the commenter review of the Draft EIR.

Comment Letter I1

Tuesday, July 22, 2025 at 12:33:20 PM Central European Summer Time

Subject: FW: Montaldo EIR comments

Date: Thursday, June 26, 2025 at 1:51:55 AM Central European Summer Time

From: Jennifer Gates

To: Diane Levine, Rima Ghannam

-----Original Message-----

From: publiccomment <Publiccomment@sonomacity.org>

Sent: Wednesday, June 25, 2025 4:37 PM

To: Jennifer Gates <JGates@sonomacity.org>; Mike Berger <mberger@sonomacity.org>; Ashley Cotter <acotter@sonomacity.org>

Subject: FW: Montaldo EIR comments

FYI...

Rebekah Barr, MMC

City Clerk

(707) 933-2216

rbarr@sonomacity.org

-----Original Message-----

From: JOAN BOURG <dirtgirls@aol.com>

Sent: Tuesday, June 24, 2025 8:14 PM

To: publiccomment <Publiccomment@sonomacity.org>

Cc: dirtgirls@aol.com

Subject: Montaldo EIR comments

6-24-2025

Greetings:

I am writing to represent my interest in the saving of a large Heritage Oak tree, Quercus Lobata, or, Valley Oak, located at the very entrance to the Montaldo property. It is directly across from the house, on its south, and faces SR 12. It stands 50 feet tall.

11-1

I understand that this Oak does not have an “ official Heritage designation” for the purposes of this EIR, but that is only because I was unaware that it was in danger until it was too late to file for this Heritage designation... One that it would surely qualify for.

I am a retired, professional Horticulturalist, and, overall Tree advocate. For years I have seen trees removed without consideration for their age , or their contribution, as they were simply “ in the way”. I disagree with these cultural - business assessments that mature trees have less value than we do, and so I fight on to save what I can.

11-2

I attended a preliminary meeting of the Montaldo project toward this end in August of 2024.

I am happy for the new housing, while also feeling like this tree does not have to be destroyed merely for a driveway placement .

11-2

Before I continue, I am a bit confused. In the May 6, 2025 letter of notice for response to the initial EIR study, the Project description states, “The existing large valley oak within the front of the parcel and visible from SR 12 would be preserved .”

I was thrilled to read that sentence !

Then, in reviewing John Meserve’s arborist report, a man I have personally worked with and respect, his charts note what I am to assume is this same tree, charted as tree #24, the largest tree on this lot. I was sad to see it is recommended for removal. The problem seems to be where it is in reference to the design of the entry driveway, and not that it is ailing or dangerous in any way.

The assessment of this tree is listed as favorable... listing ‘FAIR’ health that could be “treated if needed”, and, “ a few structure issues” , which are stated as “pruning correctable”.

11-3

I am unclear if the area where the existing Montaldo home is, and will be cleared from , could then become the entrance to this housing complex? This would facilitate the safety of the majority of the root area within the drip line of this Heritage Oak. Factors needed for continued health of this tree.

Is this re-design still possible ?

Many of us don’t realize all that trees have to offer. This tree offers so much!

It is irreplaceable as a 250 -300 year old tree. That is older than our republic !!!

It will remain an anchor to this property, making the architectural link to the 2 and 3 story buildings that are proposed. The 50 foot height will be welcome , almost needed amongst a bunch of suddenly tall apartment buildings. A stature not found in homes or businesses within the general area of this property .

It will offer welcome shade to residents who may sit under on a hot day.

It will offer continuity to the space, and connection to the Montaldo’s themselves, who clearly cared enough about this tree to have had it cared for and pruned in the past.

If we cannot keep their historic home, perhaps we can honor them and protect this Heritage tree.

It will tie in with the Spanish/ arch and stucco stylings and architectural theme that has been purposefully designed into the look and the entirety of the new apartments and property feel.

11-4

It will continue to offer food , protection and homes to the natural world... birds, insects, etc. Nesting for songbirds and raptors. Homes for native wasps. A Native tree that does not burn up readily in wild land fires. It should outlive all of us.

It will continue to absorb carbon dioxide , and transform that into the oxygen that it will release back into the world. Trees are the lungs of our planet !

It will show we care about what brings so many to this area to begin with. True, Natural Beauty.

Not everything is about function. Form matters. Aesthetics matter. Living relics and respect of elders matter. I mean , we could all live in concrete bunkers that never rot , or leak, or burn ... but we choose to build in beauty, to go hand in hand with function , in all the projects, homes and rituals in our lives.

I hope that you will do the same here. Choose to keep what is meaningful and beautiful in a world sorely in need of these things. The beautiful , meaningful and useful tree is here. Let's do what we can to keep it that way.

11-4

Respectfully submitted

Joanie Bourg
Locust ave
Sonoma

Sent from my iPad

City of Sonoma records, including emails, are subject to the California Public Records Act. Unless exemptions apply, this email, any attachments and any replies are subject to disclosure on request, and neither the sender nor any recipients should have any expectation of privacy regarding the contents of such communications.

Responses to Comment Letter I1

Comment I1-1: I am writing to represent my interest in the saving of a large Heritage Oak tree, *Quercus Lobata*, or, Valley Oak, located at the very entrance to the Montaldo property. It is directly across from the house, on its south, and faces SR 12. It stands 50 feet tall.

I understand that this Oak does not have an “official Heritage designation” for the purposes of this EIR, but that is only because I was unaware that it was in danger until it was too late to file for this Heritage designation... One that it would surely qualify for.

Response to Comment I1-1: The City appreciates your review of the Draft EIR. As discussed in Section B15, Biological Resources, of the Initial Study (Appendix A of the Draft EIR) on page 32, a tree survey of the project site, performed by a certified arborist in December 2023 (Arborist Report in Appendix E of the Draft EIR), recorded 89 trees at the project site, including the large valley oak tree near SR 12. The tree survey report documented assessed the condition of each of the 89 trees present at the project site and provided recommendation for the protection of the trees based on their condition.

As discussed in Section B15, Biological Resources, of the Initial Study, the project would preserve the large valley oak tree fronting the project site. In addition, as required through Mitigation Measure BIO-5, the proposed project would be required to include the preparation of a Tree Protection Plan that include specific protection measures of the trees to be preserved, included the large valley oak tree. These measures would prevent wounding of trunks and major roots during construction.

Comment I1-2: I am a retired, professional Horticulturalist, and, overall Tree advocate. For years I have seen trees removed without consideration for their age, or their contribution, as they were simply “in the way”. I disagree with these cultural - business assessments that mature trees have less value than we do, and so I fight on to save what I can.

I attended a preliminary meeting of the Montaldo project toward this end in August of 2024.

I am happy for the new housing, while also feeling like this tree does not have to be destroyed merely for a driveway placement.

Response to Comment I1-2: Please see response to Comment I1-1 above. The proposed project would preserve and protect the large valley oak tree.

COMMENTS AND RESPONSES TO COMMENTS

Comment I1-3: Before I continue, I am a bit confused. In the May 6, 2025 letter of notice for response to the initial EIR study, the Project description states, “The existing large valley oak within the front of the parcel and visible from SR 12 would be preserved.”

I was thrilled to read that sentence !

Then, in reviewing John Meserve’s arborist report, a man I have personally worked with and respect, his charts note what I am to assume is this same tree, charted as tree #24, the largest tree on this lot. I was sad to see it is recommended for removal. The problem seems to be where it is in reference to the design of the entry driveway, and not that it is ailing or dangerous in any way.

The assessment of this tree is listed as favorable... listing ‘FAIR’ health that could be “treated if needed”, and, “ a few structure issues” , which are stated as “pruning correctable”.

I am unclear if the area where the existing Montaldo home is, and will be cleared from , could then become the entrance to this housing complex? This would facilitate the safety of the majority of the root area within the drip line of this Heritage Oak. Factors needed for continued health of this tree.

Is this re-design still possible ?

Response to Comment I1-3: Please see response to Comment I1-1 above. The tree survey report documented assessed the condition of each of the 89 trees present at the project site and provided recommendation for the protection of the trees based on their condition. The proposed project would preserve and protect the large valley oak tree.

Comment I1-4: Many of us don’t realize all that trees have to offer. This tree offers so much! It is irreplaceable as a 250 -300 year old tree. That is older than our republic !!! It will remain an anchor to this property, making the architectural link to the 2 and 3 story buildings that are proposed.

The 50 foot height will be welcome , almost needed amongst a bunch of suddenly tall apartment buildings. A stature not found in homes or businesses within the general area of this property.

It will offer welcome shade to residents who may sit under on a hot day.

It will offer continuity to the space, and connection to the Montaldo’s themselves, who clearly cared enough about this tree to have had it cared for and pruned in the past.

If we cannot keep their historic home, perhaps we can honor them and protect this Heritage tree.

COMMENTS AND RESPONSES TO COMMENTS

It will tie in with the Spanish/ arch and stucco stylings and architectural theme that has been purposefully designed into the look and the entirety of the new apartments and property feel.

It will continue to offer food, protection and homes to the natural world... birds, insects, etc. Nesting for songbirds and raptors. Homes for native wasps. A Native tree that does not burn up readily in wild land fires. It should outlive all of us.

the world. It will continue to absorb carbon dioxide, and transform that into the oxygen that it will release back into

Trees are the lungs of our planet !

It will show we care about what brings so many to this area to begin with. True, Natural Beauty.

Not everything is about function. Form matters. Aesthetics matter. Living relics and respect of elders matter.

I mean, we could all live in concrete bunkers that never rot, or leak, or burn ... but we choose to build in beauty, to go hand in hand with function, in all the projects, homes and rituals in our lives.

I hope that you will do the same here. Choose to keep what is meaningful and beautiful in a world sorely in need of these things. The beautiful, meaningful and useful tree is here. Let's do what we can to keep it that way.

Response to Comment I1-4: Please see response to Comment I1-1 above. The proposed project would preserve and protect the large valley oak tree. The City appreciates the commenter review of the Draft EIR.

Comment Letter I2

Tuesday, July 8, 2025 at 4:48:47 PM Central European Summer Time

Subject: Montaldo Public Comment
Date: Tuesday, June 17, 2025 at 5:35:34 PM Central European Summer Time
From: Diane Levine
To: Rima Ghannam, Jennifer Gates
Attachments: Outlook-A picture .png

We have received the public comment, below.

From: publiccomment <Publiccomment@sonomacity.org>
Sent: Monday, June 16, 2025 1:20 PM
To: Diane Levine <dlevine@sonomacity.org>
Subject: Fw: Montalando property



Natalie Lundeen Bresee

Permit Technician
(707) 933-2210
nlundeen@sonomacity.org

From: Cheryl Taylor <leonasgirl@icloud.com>
Sent: Friday, May 23, 2025 6:39 AM
To: publiccomment <Publiccomment@sonomacity.org>
Subject: Montalando property

Are you really thinking of adding more housing on this BUSY street? Does the almighty dollar have more value than your common sense? Simply stupid to allow this.

I2-1

Sent from my iPhone

City of Sonoma records, including emails, are subject to the California Public Records Act. Unless exemptions apply, this email, any attachments and any replies are subject to disclosure on request, and neither the sender nor any recipients should have any expectation of privacy regarding the contents of such communications.

Responses to Comment Letter I2

Comment I2-1: Are you really thinking of adding more housing on this BUSY street? Does the almighty dollar have more value than your common sense? Simply stupid to allow this.

Response to Comment I2-1: The commenter's position is acknowledged and included in this document for decision-maker consideration. The City appreciates the commenter review of the Draft EIR.

3. ERRATA

This chapter identifies revisions to the Draft EIR. The changes are presented in the order in which they appear and identified by page number. Text deletions are shown in ~~strikeout (strikeout)~~ and additions are underlined (underlined). These edits provide clarifications or additional supportive information and do not change the analysis or conclusions of the Draft EIR.

S. Executive Summary

Revisions to Section S.3 Summary of Project Impacts and Mitigation Measures

Page 2 of the Draft EIR

Archaeological Resources, Human Remains, and Tribal Cultural Resources. Soil disturbance during project construction has the potential of uncovering isolated tools or artifacts and disturbing or discovering human remains. The proposed project would be required to implement **Mitigation Measures CR 2a: Worker's Environmental Awareness Program (WEAP), CR-2b: Unanticipated Archaeological Resource, and CR-3, Avoid Impact to Human Remains, and TCR-1 Tribal Monitoring**, which would reduce project impact on archaeological resources and human remains to a less-than-significant level.

Revisions to Table S-1 Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
Biological Resources			
Impact BIO-5: The proposed project could conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	S	<p>Mitigation Measure BIO-5 Tree Protection Plan.</p> <p>The project applicant shall retain a certified arborist to oversee the implementation of the following tree protection and tree replacement plans.</p> <p>Before the start of any clearing, excavation, construction, or other work on the site, every protected tree <u>to be retained</u> 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:</p> <ul style="list-style-type: none"> • 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: • All roots encountered that are two inches or larger in diameter must be cleanly cut as they are encountered by excavating equipment. • 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. • 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. 	LTSM

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		<ul style="list-style-type: none"> 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. <p>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.</p>	
Cultural Resources			
Impact CR-2: The proposed project could cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.	S	<p>Mitigation Measure CR-2a: Worker's Environmental Awareness Program (WEAP)</p> <p>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</p>	LTSM

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		<p><u>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. The City and/or qualified professional archaeologist shall propose a date for scheduling the training at the pre-construction meeting with City staff. The City shall notify the construction personnel at least 48 hours before holding the training and keep a log of all attendees. The training session shall include a handout and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities, the procedures to be followed in such an event; the duties of archaeological monitors; and the general steps a qualified professional archaeologist would follow in conducting a salvage investigation, if one is necessary. The City shall coordinate with the Federated Indians of Graton Rancheria on the training schedule and content.</u></p> <p>Mitigation Measure CR-2b: Unanticipated Archaeological Resources</p> <p><u>Prior to any ground disturbing activities for the proposed project, a qualified archaeologist shall prepare a Cultural Resources Monitoring and Treatment Plan for review by and in consultation with the Federated Indians of Graton Rancheria THPO and approval by the City. The Plan shall identify the type of archaeological or tribal cultural resource material that could potentially be found within the Project site and procedures to follow should any material be encountered during ground disturbing activities. The Plan shall provide procedures and guidelines for in-field assessment of the significance of any archaeological material identified during monitoring.</u></p> <p><u>A qualified professional archaeologist and tribal monitor from the Federated Indians of Graton Rancheria shall be retained to monitor all initial ground disturbing and grading work. The archaeologist must meet the Secretary of Interior's</u></p>	

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		<p><u>Professional Qualification Standards for archaeology. The archaeologist and tribal monitor shall have the authority to halt construction activities at the location of a discovery to review possible archaeological or tribal cultural resource material and to protect the resource while the materials are being assessed. Monitoring shall continue until, in the archaeologist's judgement, in consultation with the Federated Indians of Graton Rancheria THPO, additional archaeological resources are not likely to be encountered. If no archaeological or tribal cultural resources are discovered during construction, the archaeologist shall prepare a report to document the negative findings after construction is complete.</u></p> <p><u>In the event that archaeological resources are encountered during ground-disturbing activities, all work within 50 feet 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 for CRHR eligibility. This examination shall be done in consultation with the Federated Indians of Graton Rancheria THPO. 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 in accordance with the Cultural Resources Treatment Plan.</u></p> <p><u>A lead agency engages in Consultation with the Local Native American Tribe(s) to identify Tribal Cultural Resources, the significance of Tribal Cultural Resources, and to determine how any resources are to be protected. All Native American artifacts (tribal finds) shall be considered as a significant Tribal Cultural Resource, pursuant to PRC 21074 and the Treatment Plan shall be followed if any tribal finds are discovered. An</u></p>	

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		archaeological report shall be written detailing all archaeological finds and submitted to the City and the Northwest Information Center. This shall be done in consultation with the Federated Indians of Graton Rancheria's THPO.	
Impact CR-3: The proposed project could disturb any human remains, including those interred outside of dedicated cemeteries.	S	<p>Mitigation Measure CR-3: Avoid Impact to Human Remains</p> <p>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 <u>within 50 feet of the burial discovery</u> and notify the County Coroner and a professional archaeologist, and the Federated Indians of Graton Rancheria's THPO 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 (<u>Health and Safety Code § 7050.5[b]</u>). California law recognizes the need to protect interred human remains, particularly Native American burials and items of cultural patrimony, from vandalism and inadvertent destruction. 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</p>	LTSM

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		<p>following is a list of site protection measures that shall be employed:</p> <ul style="list-style-type: none"> 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. <p>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.</p>	
Geology and Soils			
Impact GEO-6: <i>The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</i>	S	<p>Mitigation Measure GEO-6: Implement Appropriate Measures in Case of Inadvertent Discovery of Paleontological Resources</p> <p>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</p>	LTSM

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		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.	
Tribal Cultural Resources			
Impact TCR-1: The proposed 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.	S	Mitigation Measures CR-2a, CR-2b, and CR-3 <u>Mitigation Measure TCR-1: Tribal Monitoring</u> <u>A tribal monitor from the Federated Indians of Graton Rancheria shall be retained to monitor all initial ground disturbing and grading work. The monitor will have the authority to halt construction activities at the location of a discovery to review possible archaeological or tribal cultural resource material and to protect the resource while the materials are being assessed. Prior to any ground disturbing activities for the proposed project, a monitoring agreement shall be in place. Monitoring shall continue until, in the judgement of the Graton Rancheria's THPO, additional tribal cultural resources are not likely to be encountered.</u>	LTSM

II. Project Description

Revisions Section II.6 Project Construction

Page 46 of the of the Draft EIR

I-6 II.6 Project Construction

The natural slope of the project site is oriented toward the east with an approximately six- to seven-foot variation from SR 12 to the eastern property line. The proposed project would result in approximately 2,000 cubic yards of excavated soil as a result of grading, trenching, and installation of the detention and infiltration basins. Approximately, 6,000 cubic yards of soil would be required for the fill, resulting in approximately net 4,000 cubic yards of soil for the fill.

Excavation would reach a maximum depth of approximately 12 feet for the installation of utilities. Construction activities including site preparation would take approximately 26 months. Typical heavy construction equipment that would be used include a backhoe, air compressor, and dump truck. Access to the site during construction would be through SR 12.

The following revisions are for the Initial Study (Appendix A of the Draft EIR)

III. Environmental Setting, Impacts, and Mitigation Measures

Revisions to III.3 Cumulative Impact Analysis - Cumulative Environmental Setting

Page 56 of the Draft EIR

Caltrans Proposed Road Improvements. Caltrans has proposed a collision reduction project on SR 12 near Boyes Hot Springs, from 0.21 miles north of Verano Avenue to 0.15 mile south of the Lomita Ave. This project would add an exclusive left-turn lane on westbound Verano Avenue, remove the existing right-turn slip lane and construct a protected intersection, upgrade existing traffic signal to a modern traffic signal system, install enhanced permanent safety lighting at the Verano Avenue intersection, install a speed feedback sign and audible accessible pedestrian signals (APSS) on all approaches to the Verano Avenue intersection, and install Americans with Disabilities Act (ADA) compliant curb gaps from Harley Street to Donald Street on SR 12. Construction is scheduled to begin in Spring 2027. Construction duration is estimated to 250 working days.

Revisions to III.4 Cultural Resources - Impact CR-1

Page 72 of the Draft EIR

Standard 8 - Significant arch archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Archaeological resources are addressed in **Section B.5, Cultural Resources** of the Initial Study (**Appendix A**). As stated in the Initial Study, the proposed project could result in a significant impact to archaeological resources and human remains and requires implementation of **Mitigation Measure M-CR-2: Worker's Environmental Awareness Program (WEAP)**, **and Mitigation Measure M-CR-3: Unanticipated Archaeological Resources, and Mitigation Measure TCR-1: Tribal Monitoring**. With implementation of Mitigation Measures M-CR-2, and M-CR-3, and TCR-1, the proposed project would be in conformance with this standard.

Therefore, the proposed project is in conformance with Standard 8.

Standard 9 - New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

The proposed project would demolish the Montaldo House and would redevelop the site with seven new buildings. Therefore, the proposed project is not in conformance with Standard 9.

Standard 10 - New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

One of the proposed new buildings (Building 1) would replace the historical resource that would be demolished.

Therefore, the proposed project is not in conformance with Standard 10.

Based on the above evaluation of the project the City of Sonoma finds some the proposed project not in conformance with the Secretary's Standards. The demolition of the Montaldo house would remove historic materials, features, and spaces that characterize the property and would result in physical destruction such that the significance of the individual historical resource would be materially impaired. As such, the project impact on the historical resource would be significant and unavoidable.

The impact of demolition of a historical resource generally cannot be mitigated to a less-than-significant level. The proposed project would be required to implement Mitigation Measures M-CR-1a and M-CR-1b, which require written and photographic documentation as well as appropriate interpretation of the Montaldo House before demolition. Implementation of Mitigation Measures M-CR-1a and M-CR-1b, presented below would reduce the impact resulting from demolition of the historical resources, though not to a less-than-significant level. The impact on historical resources would remain significant and unavoidable even after the implementation of the following mitigation measures.

B4. Biological Resources

Revisions under Impact BIO-1

Page 31 of the of the Initial Study

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-1a**, 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-1a**, 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 2022,² 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-21b**, which requires surveys prior to demolition and tree removal to minimize the potential take of these species. With the implementation of **Mitigation Measure BIO-21b**, 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-31c** would reduce the

² 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.

project potential impact to nesting birds to a ***less-than-significant level with mitigation incorporated.***

With the implementation of Mitigation Measures BIO-1a and BIO-21b, and BIO-31c, the impact of the proposed project related to special-status species would be ***less than significant with mitigation incorporated.***

Revisions to Mitigation Measures BIO-5

Page 35 of the of the Initial Study

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 to be retained 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.

B5. Cultural Resources

Revisions to Impact CR-3

Page 38 of the Initial Study

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~~ Prior ground disturbing activity and testing have ~~not identified human remains at 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*.

Revisions to Impact C-CR-2

Page 38 of the Initial Study

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 cumulative analysis are at least 0.5 miles away from the site. For these reasons, the proposed project, in combination with other projects considered in the cumulative analysis 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*.

Revisions to Mitigation Measure CR-2a

Page 38 of the Initial Study

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.~~ The City and/or qualified professional archaeologist shall propose a date for scheduling the training at the pre-construction meeting with City staff. The City shall notify the construction

personnel at least 48 hours before holding the training and keep a log of all attendees. The training session shall include a handout and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities, the procedures to be followed in such an event; the duties of archaeological monitors; and the general steps a qualified professional archaeologist would follow in conducting a salvage investigation, if one is necessary. The City shall coordinate with the Federated Indians of Graton Rancheria on the training schedule and content.

Revisions to Mitigation Measure CR-2b

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Prior to any ground disturbing activities for the proposed project, a qualified archaeologist shall prepare a Cultural Resources Monitoring and Treatment Plan for review by and in consultation with the Federated Indians of Graton Rancheria THPO and approval by the City. The Plan shall identify the type of archaeological or tribal cultural resource material that could potentially be found within the Project site and procedures to follow should any material be encountered during ground disturbing activities. The Plan shall provide procedures and guidelines for in-field assessment of the significance of any archaeological material identified during monitoring.

A qualified professional archaeologist and tribal monitor from the Federated Indians of Graton Rancheria shall be retained to monitor all initial ground disturbing and grading work. The archaeologist must meet the Secretary of Interior's Professional Qualification Standards for archaeology. The archaeologist and tribal monitor shall have the authority to halt construction activities at the location of a discovery to review possible archaeological or tribal cultural resource material and to protect the resource while the materials are being assessed. Monitoring shall continue until, in the archaeologist's judgement, in consultation with the Federated Indians of Graton Rancheria THPO, additional archaeological resources are not likely to be encountered. If no archaeological or tribal cultural resources are discovered during construction, the archaeologist shall prepare a report to document the negative findings after construction is complete.

In the event that archaeological resources are encountered during ground-disturbing activities, all work within 50 feet 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 for CRHR eligibility. This examination shall be done in consultation with the Federated Indians of Graton Rancheria THPO. 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 in accordance with the Cultural Resources Treatment Plan.

A lead agency engages in Consultation with the Local Native American Tribe(s) to identify Tribal Cultural Resources, the significance of Tribal Cultural Resources, and to determine how any resources are to be protected. All Native American artifacts (tribal finds) shall be considered as a significant Tribal Cultural Resource, pursuant to PRC 21074 and the Treatment Plan shall be followed if any tribal finds are discovered. An archaeological report shall be written detailing all archaeological finds and submitted to the City and the Northwest

Information Center. This shall be done in consultation with the Federated Indians of Graton Rancheria's THPO.

Revisions to Mitigation Measure CR-3

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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~~ within 50 feet of the ~~burial discovery~~ and notify the County Coroner and a professional archaeologist, ~~and the Federated Indians of Graton Rancheria's THPO~~ 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 (Health and Safety Code § 7050.5[b]). California law recognizes the need to protect interred human remains, particularly Native American burials and items of cultural patrimony, from vandalism and inadvertent destruction. 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.~~

B11. Land Use and Planning*Revisions to Table B-8 Summary of General Plan Consistency*

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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 compatible with neighborhood and town character	Consistent. The proposed project would develop the 2.15-acre site with 50 apartment 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		
CDER -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
CDER -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.
CDER -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.

B17. Transportation

Revisions to Impact C-TR-1

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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~~ all 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~~ the Verano Hotel and Housing Project and the Hotel Project Sonoma would be required to comply with encroachment permit requirements and the projects's layout would be reviewed by the Sonoma County and the City traffic engineer, respectively. 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.

B18. Tribal Cultural Resources

Revisions to Impact CR-3

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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 (Graton Rancheria) responded to request formal tribal consultation and requested research information 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~~ mailed 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.~~ On May 6, 2025 the City mailed a Notice of Availability to Graton Rancheria, to which no response was received. On July 21, 2025 the City emailed Federated Indians of Graton Rancheria THPO regarding the pending decision date, to which Graton Rancheria did respond. Graton Rancheria and the City collaborated during a meeting and via electronic mail to address the Tribe's concerns.

As requested by the formal consultation, the City continues to include the Tribe on all public notifications that are part of the CEQA process and will proceed with the formal consultation until concluded.

~~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 however has identified the high sensitivity for a tribal cultural resource at the project site. Mitigation Measure TCR-1 would require a monitoring agreement and a tribal monitor from the Federated Indians of Graton Rancheria in place prior to any ground disturbing activity at the project site who would have the authority to halt construction activities at the project site. They would have the authority to halt construction activities in the location of a discovery to review possible archaeological or tribal cultural resource material and to protect the resource while the materials are being assessed. In addition, ~~As as~~ noted in **Section B.5 - Cultural Resources**, implementation of Mitigation Measures CR-2a, CR-2b, and CR-3 requires that a professional archaeologist and tribal monitor from Graton Rancheria be present for all initial ground-disturbing activities, and that a Cultural Resources Monitoring and Treatment Plan be implemented in the event that an archaeological or tribal cultural resource is found. Implementation of this measure and continued consultation under AB 52 with the Graton Rancheria would ensure that the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. The impact 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.

Mitigation Measure TCR-1: Tribal Monitoring

A tribal monitor from the Federated Indians of Graton Rancheria shall be retained to monitor all initial ground disturbing and grading work. The monitor will have the authority to halt construction activities at the location of a discovery to review possible archaeological or

tribal cultural resource material and to protect the resource while the materials are being assessed. Prior to any ground disturbing activities for the proposed project, a monitoring agreement shall be in place. Monitoring shall continue until, in the judgement of the Graton Rancheria's THPO, additional tribal cultural resources are not likely to be encountered.

Appendix D - Air Quality Analysis and Supporting Information

Revisions to Traffic Emissions Modeling

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The annual average daily traffic (AADT) for Highway 12 was based on information Caltrans' Census data for the year 2022.

4. MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

This document is a Mitigation Monitoring and Reporting Program (MMRP) for the Montaldo Apartments project (proposed project) in the City of Sonoma, California.

The purpose of the MMRP is to ensure the implementation of mitigation measures identified as part of the environmental review for the proposed project.

The MMRP includes the following information:

- + A list of impacts and their corresponding mitigation measures.
- + The party responsible for implementing mitigation measures.
- + The timing for implementation of the mitigation measure.
- + The agency responsible for monitoring the implementation of mitigation measures.
- + The procedure and frequency for monitoring the implementation of mitigation measures.

The MMRP also serves as a form for the monitoring agency to document the date that mitigation implementation is verified.

The City of Sonoma must adopt this MMRP, or an equally effective program, if it approves the proposed project with the mitigation measures included in the Environmental Impact Report for the Montaldo Apartments project. Public Resources Code Section 21081.6(a) requires an agency to adopt a program for reporting or monitoring mitigation measures that were adopted or made Conditions of Project Approval.

TABLE I MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
Air Quality						
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.	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} : <ul style="list-style-type: none"> • 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 	Construction Contractor	During construction	City of Sonoma Building Division	During regularly scheduled site inspections	Initials: _____ Date: _____

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.</p> <ul style="list-style-type: none"> • 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. Building 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. 					

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<ul style="list-style-type: none"> 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. 					
<p>Impact AIR-3: The project would not expose sensitive receptors to substantial pollutant concentrations.</p>	<p>Mitigation Measure AIR-3: Construction Equipment with Low Diesel Particulate Matter Exhaust Emissions.</p> <p>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:</p> <ul style="list-style-type: none"> 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 (PM10 and PM2.5), 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 	Construction Contractor	During construction	City of Sonoma Building Division	During regularly scheduled site inspections	Initials: _____ Date: _____

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>diesel particulate matter emissions by 10 percent or greater. Elements of the plan could include a combination of some of the following measures:</p> <ul style="list-style-type: none"> ○ 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. 					
Biological Resources						
Impact BIO-1: <i>The project could have a substantial adverse</i>	Mitigation Measure BIO-1a: Special-Status Bat Species	Qualified Biologist	Prior to construction	City of Sonoma Building	Before each season	Initials: _____ Date: _____

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
<p><i>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.</i></p>	<p>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 conduct preconstruction surveys for roosting bats 14 days prior to 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.</p> <p>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 conduct preconstruction surveys 14 days prior to 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</p>			Division		

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>establishment of a non-disturbance buffer until the young have reached independence. The size of the buffer zone shall 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.</p> <p>Mitigation Measure BIO-1b: Special-Status Bumble Bees</p> <p>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</p>					

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>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 written 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. The City of Sonoma shall approve the plan prior to implementation.</p> <p>Mitigation Measure BIO-1c: Nesting Birds</p> <p>To avoid impacts on nesting birds, a nesting survey shall be conducted 15 days prior to starting construction work or tree removal if this work would commence between February 1st and August</p>					

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>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.</p> <p>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</p>					

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>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.</p> <p>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.</p>					
Impact BIO-5: <i>The project could conflict with any local policies or ordinances</i>	Mitigation Measure BIO-5 Tree Protection Plan.	Qualified Arborist	Prior to issuance of building permits	City of Sonoma Planning Division	Once	Initials: _____ Date: _____

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
<i>protecting biological resources, such as a tree preservation policy or ordinance.</i>	<p>The project applicant shall retain a certified arborist to oversee the implementation of the following tree protection and tree replacement plans.</p> <p>Before the start of any clearing, excavation, construction, or other work on the site, every protected tree to be retained 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:</p> <ul style="list-style-type: none"> • 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: • All roots encountered that are two inches or larger in diameter must be cleanly cut as they are encountered by excavating equipment. • Roots may not be ripped from the ground and then trimmed. 					

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>They must be trimmed as encountered and this will require the use of a ground man working with a suitable power tool.</p> <ul style="list-style-type: none"> • 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 					

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>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.</p> <p>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.</p>					
Cultural Resources						
Impact CR-1: <i>The project would cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5.</i>	<p>Mitigation Measure CR-1a: Documentation of Historical Resources</p> <p>Before any demolition activities within the project site, the applicant shall retain a professional who meets the Secretary of the Interior's Professional Qualification Standards for Architectural History to prepare written and photographic documentation of the Montaldo House. The documentation shall be based on the National Park Service's Historic American</p>	Qualified Historian (Meets the Secretary of Interior's Professional Qualifications)	Prior to issuance of building permits	City of Sonoma Planning Division	Once	Initials: _____ Date: _____

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>Building Survey (HABS). This type of documentation is based on the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation and the National Park Service's policy for photographic documentation, as outlined in the National Register and National Historic Landmarks Survey Photo Policy Expansion. The documentation shall include the following elements:</p> <ul style="list-style-type: none"> • Accurate scaled mapping and architectural descriptions. If available, scaled architectural plans shall also be included; • Photographs in large-format (4-inch by 5-inch) black-and-white negatives and 8-inch by 10-inch enlargements. Digital photography may be substituted for large-format negative photography if archived locally; • A report containing site-specific history and appropriate contextual information. This information shall be gathered through site-specific and comparative archival research and oral history collection as appropriate; and • The applicant shall transmit such documentation to the City of Sonoma Planning Division 					

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>for distribution to local libraries and/or preservation organizations. All documentation shall be scoped and then shall be reviewed and approved by the City of Sonoma before issuance of the demolition permit.</p> <p>Mitigation Measure CR-1b: Interpretation</p> <p>Before any demolition activities within the project site, the applicant shall retain a qualified professional to design and undertake an appropriate interpretation of the affected historical resource and its setting. The interpretation shall be conducted by a professional Architectural Historian who meets the Secretary of the Interior's Professional Qualification Standards to prepare interpretation of the historical resource. This mitigation measure would supplement the traditional HABS/HALS documentation and would enhance the collection of reference materials that would be available to the public and inform future research. The Architectural Historian will work with the City of Sonoma Planning Division and local preservation advocates to choose an appropriate format for interpretation of the historical resource. Appropriate forms of interpretation may include: a</p>					

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>curated display for a local library or museum, a website, or a short film.</p> <p>The interpretation shall be reviewed and approved by the City of Sonoma prior to issuance of a demolition permit for the project. Archival copies of the documentation shall be submitted to the City of Sonoma.</p> <p>Mitigation Measure CR-1c: Salvage Historic Resource</p> <p>The project applicant shall give local historical societies or local architectural salvage companies the opportunity to salvage character-defining or significant features from the historical resource for public information or reuse in other locations. The project applicant shall contact local historical societies and architectural salvage companies and notify them of the available resources and make them available for removal. If, after 30 days, no organization is able and willing to salvage the significant materials, demolition can proceed.</p>					
Impact CR-2: <i>The project could cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.</i>	<p>Mitigation Measure CR-2a: Worker's Environmental Awareness Program (WEAP)</p> <p>The project applicant shall retain an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology</p>	Construction Contractor	Prior to construction	City of Sonoma Planning Division	Once	Initials: _____ Date: _____

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>(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 City and/or qualified professional archaeologist shall propose a date for scheduling the training at the pre-construction meeting with City staff. The City shall notify the construction personnel at least 48 hours before holding the training and keep a log of all attendees. The training session shall include a handout and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities, the procedures to be followed in such an event; the duties of archaeological monitors; and the general steps a qualified professional archaeologist would follow in conducting a salvage investigation, if one is necessary. The City shall coordinate with the Federated Indians of Graton Rancheria on the training schedule and content.</p> <p>Mitigation Measure CR-2b: Unanticipated Archaeological Resources</p> <p>Prior to any ground disturbing activities for the proposed project, a qualified archaeologist shall</p>					

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>prepare a Cultural Resources Monitoring and Treatment Plan for review by and in consultation with the Federated Indians of Graton Rancheria THPO and approval by the City. The Plan shall identify the type of archaeological or tribal cultural resource material that could potentially be found within the Project site and procedures to follow should any material be encountered during ground disturbing activities. The Plan shall provide procedures and guidelines for in-field assessment of the significance of any archaeological material identified during monitoring.</p> <p>A qualified professional archaeologist and tribal monitor from the Federated Indians of Graton Rancheria shall be retained to monitor all initial ground disturbing and grading work. The archaeologist must meet the Secretary of Interior's Professional Qualification Standards for archaeology. The archaeologist and tribal monitor shall have the authority to halt construction activities at the location of a discovery to review possible archaeological or tribal cultural resource material and to protect the resource while the materials are being assessed.</p>					

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>Monitoring shall continue until, in the archaeologist's judgement, in consultation with the Federated Indians of Graton Rancheria THPO, additional archaeological resources are not likely to be encountered. If no archaeological or tribal cultural resources are discovered during construction, the archaeologist shall prepare a report to document the negative findings after construction is complete.</p> <p>In the event that archaeological resources are encountered during ground-disturbing activities, all work within 50 feet 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 for CRHR eligibility. This examination shall be done in consultation with the Federated Indians of Graton Rancheria THPO. 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</p>					

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>significant impacts to historical resources in accordance with the Cultural Resources Treatment Plan.</p> <p>A lead agency engages in Consultation with the Local Native American Tribe(s) to identify Tribal Cultural Resources, the significance of Tribal Cultural Resources, and to determine how any resources are to be protected. All Native American artifacts (tribal finds) shall be considered as a significant Tribal Cultural Resource, pursuant to PRC 21074 and the Treatment Plan shall be followed if any tribal finds are discovered. An archaeological report shall be written detailing all archaeological finds and submitted to the City and the Northwest Information Center. This shall be done in consultation with the Federated Indians of Graton Rancheria's THPO.</p>					
<p>Impact CR-3: <i>The project could disturb any human remains, including those interred outside of dedicated cemeteries.</i></p>	<p>Mitigation Measure CR-3: Avoid Impact to Human Remains</p> <p>As described therein, if human remains are uncovered during ground-disturbing activities, the project applicant and contractors would be required to halt excavation within 50 feet of the discovery and notify the County Coroner and a professional archaeologist, and the Federated</p>	Construction Contractor	During construction	City of Sonoma Building Division	When triggered per mitigation measure	<p>Initials: _____</p> <p>Date: _____</p>

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<p>Indians of Graton Rancheria's THPO 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 (Health and Safety Code § 7050.5[b]). California law recognizes the need to protect interred human remains, particularly Native American burials and items of cultural patrimony, from vandalism and inadvertent destruction. 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 (California Health and Safety Code Section 7050[c]). The responsibilities for acting upon notification of a discovery of Native American human remains are identified in California Public Resources Code Section 5097.9. 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</p>					

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	take appropriate steps to ensure that additional human interments are not disturbed.					
Geology, Soils, and Seismicity						
Impact GEO-6: <i>The project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</i>	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	Qualified paleontologist	Prior to construction	City of Sonoma Planning Division	Once	Initials: _____ Date: _____

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	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.					
Noise						
Impact NOI-1: <i>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.</i>	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; <ul style="list-style-type: none"> All unnecessary idling of internal combustion engines shall be prohibited; 	Project Sponsors	Prior to issuance of building permits	City of Sonoma Building Division	Plan review/ Site inspection Once	Initials: _____ Date: _____ Initials: _____ Date: _____

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
	<ul style="list-style-type: none"> 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 					

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	<p>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.</p> <ul style="list-style-type: none"> 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. 					
Transportation and Traffic						
Impact TR-3: The project would not substantially increase hazards due to a geometric design feature.	<p>Mitigation Measure TR-1: Entryway Features.</p> <p>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.</p>	Project Applicant	Prior to issuance of building permits	City of Sonoma Planning Division	Once	Initials: _____ Date: _____
Tribal Cultural Resources						
Impact TCR-1: The	Measure TCR-1: Tribal	Project	Prior to	City of	Once	Initials: _____

City of Sonoma
Montaldo Apartments Project

Impact	Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Frequency	Verified Implementation
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	Monitoring A tribal monitor from the Federated Indians of Graton Rancheria shall be retained to monitor all initial ground disturbing and grading work. The monitor will have the authority to halt construction activities at the location of a discovery to review possible archaeological or tribal cultural resource material and to protect the resource while the materials are being assessed. Prior to any ground disturbing activities for the proposed project, a monitoring agreement shall be in place. Monitoring shall continue until, in the judgement of the Graton Rancheria's THPO, additional tribal cultural resources are not likely to be encountered.	contractors	construction	Sonoma Planning Division		Date: _____