County of Sonoma
State of California

THE WITHIN INSTRUMENT IS A CORRECT COPY OF THE ORIGINAL ON FILE IN THIS OFFICE

ATTEST: August 22, 2023
M. CHRISTINA RIVERA, Clerk/Secretary
BY Noelle Francis

Date: August 22, 2023

Item Number: 35
Resolution Number: 23-0428

☐ 4/5 Vote Required

Resolution Of The Board Of Supervisors Of The County Of Sonoma, State Of California, Certifying the Environmental Impact Report for the 2023-2031 Housing Element Update Project, Making Findings of Fact Pursuant to the California Environmental Quality Act, Adopting a Statement of Overriding Considerations, and Approving a Mitigation Monitoring and Reporting Program

Whereas, the Board of Supervisors of the County of Sonoma is the decision-making body for the 2023-2031 Sonoma County Housing Element Update Project (the Project), which includes adoption and implementation of the 2023-2031 Housing Element and related amendments to General Plan land use and zoning of sites as necessary to accommodate the County's 3,824-unit regional housing need allocation ("RHNA") for the planning period (the "Project"); and

Whereas, on June 15, 2022, the County issued a Notice of Preparation of an Environmental Impact Report ("EIR") and Notice of Public Scoping Session for the Project. A scoping session was held on June 28, 2022 to provide responsible, trustee, and federal agencies and members of the public the opportunity to comment on the scope and content of the environmental analysis to be included in the EIR. Written comments from public agencies and members of the public were accepted during the 45-day scoping period that ended on July 30, 2022; and

Whereas, on December 28, 2022, the County posted and filed the Draft Environmental Impact Report ("Draft EIR") (State Clearinghouse No. 2022060323), and a Notice of Completion of the Draft EIR and Notice of Public Hearing to be held on February 2, 2023 was posted with the

County Clerk, transmitted to the State Clearinghouse, mailed to local and state agencies, published in the Press Democrat, and emailed to interested parties. Owners and neighbors within 300 feet of sites proposed for rezoning or land use amendment received the Notice of Availability by mail with project contact information to address questions and written comment; and

Whereas, on February 2, 2023, during the public review and comment period for the Draft EIR, the Planning Commission held a duly noticed public hearing to receive oral comments on the Draft EIR; and

Whereas, on June 30, 2023, in accordance with applicable law, the County published and posted the Final Environmental Impact Report for the Project ("Final EIR"), which includes written responses to all comments received on the Draft EIR during the public review and comment period, as well as revisions and errata to the Draft EIR. The Final EIR volume published on June 30, 2023, including its Appendices, together with the Draft EIR and all appendices thereto, constitute the Final EIR for the Housing Element Update Project; and

Whereas, on July 13, 2023 and July 20, 2023, the Planning Commission held a duly noticed public hearing, in accordance with applicable law, to hear and consider all relevant testimony and evidence on the Final EIR and the Housing Element Update Project, and to make recommendations to the Board of Supervisors regarding certification of the Final EIR and adoption of the Housing Element Update Project; and

Whereas, the Planning Commission adopted a resolution recommending that the Board of Supervisors certify the Final EIR and adopt the Project, with recommended modifications to certain programs and sites proposed for land use amendments and rezoning for inclusion in the Housing Element site inventory; and

Whereas, in accordance with applicable law, the Board of Supervisors held a duly noticed public hearing on August 22, 2023, during which the Board of Supervisors heard and received all relevant testimony and evidence presented regarding the Project. All interested persons were given an opportunity to hear and be heard regarding the Project; and,

Now, Therefore, Be It Resolved that the Sonoma County Board of Supervisors finds and determines as follows:

1. The foregoing recitals are true and correct, and incorporated into these findings.

2. The Final EIR was presented to the Board, and the Board independently reviewed, considered and analyzed the Final EIR and other information in the entire record of these proceedings, including comments received at the public hearings on the Final EIR and on the Project, prior to approving the Project.

3. The Board's findings herein are based upon the information and evidence set forth in the Final EIR and upon other substantial evidence presented at the hearing and in the entire record of these proceedings.

4. The Board of Supervisors finds that agencies and interested members of the public have been afforded ample notice and opportunity to comment on the Final EIR and the Project.

Be It Further Resolved that the Board of Supervisors hereby:

1. Certifies, in accordance with CEQA Guidelines Section 15090 and Public Resources Code Section 21082.1, that the Final EIR is adequate and completed in compliance with CEQA, the CEQA Guidelines, and the County Code, and that the Final EIR reflects the independent judgement and analysis of the County as lead agency and the Board of Supervisors as its decision-making body.

2. Adopts the Findings of Fact and Statement of Overriding Considerations for the Project, attached hereto as Exhibits "1C" and "1D" and incorporated herein by reference.

3. Adopts and incorporates into the Project all of the mitigation measures for the Project that are identified in the Findings and that are within the responsibility and jurisdiction of the County.

4. Adopts the Mitigation Monitoring and Reporting Program for the Project, attached hereto as Exhibit 1B and incorporated herein by reference.

Be It Further Resolved that the Board of Supervisors designates the Director of Permit Sonoma or designee as the custodian of the documents and other material which constitute the record

of proceedings upon which the decision herein is based. These documents may be found at the

County of Sonoma Permit and Resource Management Department, 2550 Ventura Avenue,

Santa Rosa, California 95403.

The Foregoing Resolution was introduced by Supervisor Hopkins who moved its adoption, seconded by Supervisor Gorin and adopted on roll call by the following vote:

Supervisors:

Gorin: Aye Rabbitt: Aye Gore: Aye Hopkins: Aye Coursey: Aye

Ayes: 5 Noes: 0 Absent: 0 Abstain: 0

So Ordered.

EXHIBITS

Exhibit 1A: Final Environmental Impact Report

Exhibit 1B: Mitigation Monitoring and Reporting Program

Exhibit 1C: Findings of Fact

Exhibit 1D: Statement of Overriding Considerations

Exhibit 1A

Housing Element Update

Final Environmental Impact Report
Responses to Comments on the Draft EIR

SCH#2022060323

prepared by

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June 2023

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Appendices

Acronyms and Abbreviations

AFY	acre-feet per year
BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
CEQA	California Environmental Quality Act
DOF	California Department of Finance
ESD	equivalent single family dwelling
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
GSP	Groundwater Sustainability Plan
LID	Low Impact Development
MS4	Municipal Separate Storm Sewer System
NOP	Notice of Preparation
NPDES	National Pollution Discharge Elimination System
PG&E	Pacific Gas and Electric Company
SVCAC	Sonoma Valley Citizens Advisory Commission
SWPPP	Stormwater Pollution Prevention Plan
UGB	Urban Growth Boundary
USA	Urban Service Area
VMT	vehicle miles traveled
WUI	Wildland Urban Interface

1 Introduction

1.1 Purpose of the Response to Comments on the Draft EIR

This document contains responses to comments received on the Draft Environmental Impact Report (Draft EIR) prepared for the Sonoma County Housing Element Update (project). The Draft EIR identifies the likely environmental consequences associated with development facilitated by the proposed project and recommends mitigation measures to reduce potentially significant impacts. This document, together with the Draft EIR, constitutes the Final EIR for the proposed project.

1.2 Environmental Review Process

Pursuant to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft EIR.

The County of Sonoma distributed a Notice of Preparation (NOP) of the Program EIR for a 30-day agency and public review period commencing June 15, 2022, and closing July 15, 2022. In addition, the County held a virtual Scoping Meeting on June 28, 2022 at 6:00 p.m. The meeting was aimed at providing information about the proposed project to members of public agencies, interested stakeholders and residents/community members, and at receiving comments on the scope and content of the EIR. Due to the COVID-19 pandemic, the virtual meeting was held through an online meeting platform and a call-in number.

The Draft EIR was made available for public review for a 55-day comment period that began on December 28, 2022 and ended on February 23, 2023. The Notice of Availability of a Draft EIR was posted with the County Clerk, sent to the State Clearinghouse, mailed to local and state agencies, published in the newspaper, and emailed to interested parties. Property owners and neighbors within 300 feet of proposed inventory sites received the Notice of Availability by mail including project contact information to address questions and receive written comment. In addition, the Planning Commission received verbal comments on the Draft EIR during the public hearing on February 2, 2023.

The County received 271 individual written comments on the Draft EIR. Copies of written comments received during the comment period are included in Section 3 of this document.

1.3 Document Organization

This document consists of the following chapters:

- **Section 1: Introduction.** This chapter discusses the purpose and organization of this response to comments Document and the Final EIR and summarizes the environmental review process for the project.
- **Section 2: Master Responses.** This chapter includes responses to similar comments that were received by multiple commenters. These responses are aggregated to provide for one succinct response for each subject area.

- **Section 3. Written Comments and Responses.** This chapter contains reproductions of all comment letters received on the Draft EIR. A written response for each CEQA-related written comment received during the public review period is provided. Each response is keyed to the corresponding comment.
- **Section 4: Public Hearing Comments and Responses.** This chapter contains a summary of comments received during the Planning Commission public hearing held on June 28, 2022. A written response to CEQA-related comments is provided.
- **Section 5: Revisions to the Draft EIR**. Changes to the Draft EIR that have been made in light of the comments received are contained in this chapter.

1.4 Draft EIR Recirculation Not Required

CEQA Guidelines Section 15088.5 requires Draft EIR recirculation when comments on the Draft EIR or responses thereto identify "significant new information." Significant new information is defined as including:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The comments, responses, and Draft EIR amendments presented in this document do not constitute such "significant new information;" instead, they clarify, amplify, or make insignificant modifications to the Draft EIR. For example, none of the comments, responses, and Draft EIR amendments disclose new or substantially more severe significant environmental effects of the proposed project, or new feasible mitigation measures or alternatives considerably different than those analyzed in the Draft EIR that would clearly lessen the proposed project's significant effects.

Since publication of the Draft EIR, County staff developed a list of "Recommended Inventory Sites" based on public input, site-specific analysis of suitability for inclusion in the Housing Element site inventory, changes in site circumstances, and other factors. Twenty-one of the Rezoning Sites are not included in staff's list of Recommended Inventory Sites (GEY-2, GUE-1, GUE-2, GUE-3, LAR-2, LAR-5, LAR-6, FOR-2, FOR-5, FOR-6, GRA-5, SAN-1, SAN-3, SAN-5, GLE-1, GLE-2, PEN-5, PET-1, PET-2, PET-3, and PET-4). Two new sites were added to the proposed inventory that would not require rezoning to a higher density to allow housing (GLE-3, GLE-4), while seven were removed from the inventory (PEN-11, PEN-12. GUE-5, GUE-6, FOR-7, SAN-13, and SAN-14). Overall, the changes to the "Recommended Inventory Sites" list results in a decrease in the number of housing sites and in the buildout as a result of implementation of the Housing Element; in addition, all five new sites were the subject of previous certified CEQA documents. Accordingly, impacts related to growth facilitated by the Housing Element would in general be lesser than those identified in the Draft EIR. Additionally, the Housing Element now contains Programs 4b and 4c. Program 4b states the County will rezone the 30.32 acres of land, located at Guerneville Road and Lance Drive within an unincorporated island in the City of Santa Rosa (identified as SAN-18, SAN-19, and SAN-20) to match the prezoning and the North Station Area Specific Plan adopted

by the City following certification of an EIR for the North Station Area Specific Plan. Implementation of this program will also be done in compliance with CEQA. Program 4c states the County has identified the existing County administrative center campus as able to accommodate future housing. Implementation of this program would be subject to future CEQA review. The necessary changes to reflect the addition of the five new inventory sites and Programs 4b and 4c in Section 2, *Project Description*, of the EIR are provided in Section 5, *Revisions to the Draft EIR*, of this Final EIR. Although there are new sites on the housing opportunity sites list, the environmental impacts related to future development facilitated by the Housing Element on these sites has been adequately addressed in the Draft EIR, and no substantial revisions were necessary. This is not considered to be significant new information requiring recirculation.

2 Master Responses

This section presents responses to comments that were made by more than one commenter. Responses to specific comment letters may refer the commenter to one or more of the master responses presented herein.

As a general introduction, it should be noted that this Final EIR's conclusions on the character and significance level of environmental impacts are supported by substantial evidence, which is presented in the Draft EIR and further clarified in this Final EIR (specifically Sections 2, 3, and 4, which provide responses to comments received on the Draft EIR). The County acknowledges that some commenters disagree with some conclusions in the Draft EIR. Consistent with the intent of CEQA and the CEQA Guidelines for its implementation, this Final EIR also includes the differing opinions presented by the commenters. As stated in the *CEQA Guidelines* (Section 15151), disagreement among commenters, including experts, does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts; this is done in this Final EIR.

2.1 Master Response EXST: Existing Conditions

Commenters expressed concern regarding existing environmental conditions, hazards, utilities, and general infrastructure availability. Commenters highlighted many of the existing conditions of the County and its ability to adequately support housing and population growth. Commenters state general conditions regarding sites in the County.

The commenters refer to existing conditions within the County and perceived issues with the above referenced areas, such as concerns regarding existing traffic congestion and natural hazards (e.g., existing wildfire and flood risks). The Draft EIR includes a discussion of existing conditions related to individual impact areas and specific to *CEQA Guidelines* Appendix G questions. Individual impact areas include a discussion of the existing conditions which are then compared to the anticipated change induced by the project. While the concerns of the commenters regarding the issues listed above are noted, they are deemed to be adequately discussed in the Draft EIR. No revisions to the Draft EIR are necessary in response to this comment.

2.2 Master Response SITE: Site Selection

Commenters asked about the site selection process and suggested alternative sites to include or specific sites to exclude from the proposed project.

This comment is on the project rather than the Draft EIR so requires no further response but will be considered by the County's decision-makers as part of the adoption process. As noted in Section 2.5, *Project Background* (page 2-3 of the Draft EIR), the sites were identified during the previous Rezoning Sites for Housing Project. For that selection process, from December 2018 through the end of March 2019 the County asked for the public's help in identifying sites, and almost 200 sites were nominated. County staff evaluated all nominated sites to determine if they met the basic eligibility criteria. Of those original sites, the County narrowed its list to 59 Potential Sites based on these four basic requirements:

1. Site must be located in the unincorporated County.

2. Site must be located within an established, General Plan-designated Urban Service Area where public sewer and water service is available.
3. Site must not be located within a voter-approved Community Separator.
4. If a site is near an incorporated city, it must be located within that city's voter-approved Urban Growth Boundary.

As part of the Rezoning Sites for Housing project, the County noticed property owners and conducted outreach. The County sent out letters to property owners of Rezoning Sites on September 10, 2019 and updated letters on March 5, 2020, informing property owners of the environmental review process; publication of the NOP; the 30-day scoping period; and the scoping meeting at the Sonoma County Board of Supervisors Chambers on April 2, 2020. The NOP for the Rezoning Sites for Housing EIR dated March 11, 2020, and a revised NOP dated April 17, 2020 were both sent to property owners on record. The County then sent out letters again to the property owners of Rezoning Sites on November 24, 2021, informing property owners of the environmental review process.

In addition to the above-listed criteria, the General Plan sets forth additional criteria to be used in considering which sites to rezone for housing (existing Housing Element Policy HE-2f and Programs 11 and 20). These factors include proximity to jobs, transit, services, and schools.

At the time of the publication of the Draft EIR on December 28, 2022, the County identified 79 total sites for the 6th cycle Housing Element site inventory that would satisfy the RHNA allocation. Of these 79 sites, the 59 Rezoning Sites were included and the remaining 20 sites on the proposed inventory were already zoned for residential units at an adequate density to meet the County's RHNA goals and do not require rezoning. Since the publication of the Draft EIR on December 28, 2022, the County added five additional inventory sites and removed seven as described in Section 1.4 of this document. Following review of input from the public and its own analysis, staff's final list of sites recommended for rezoning includes 38 of the 59 analyzed Rezoning Sites, and five additional inventory sites. However, the environmental analysis in the Draft EIR included all 59 sites as a conservative assumption.

2.3 Master Response HE: Dissatisfaction with the Housing Element and/or Rezoning Sites

Commenters expressed dissatisfaction with the number of Rezoning Sites proposed in the Housing Element Update. Commenters requested the removal of several sites.

The Housing Element Update aims to encourage development of housing within the County. However, the Housing Element Update does not propose specific projects. A site on the list of Rezoning Sites does not guarantee that the site will or will not be developed. Similarly, a site on the list of Rezoning sites does not guarantee that the site will or will not be rezoned, as that decision is up to the decision-makers. This comment, and comments similar, will be noted and passed onto decision-makers. However, expressions of opinion relating to the proposed project are not related to the adequacy of the analysis and conclusions in the EIR.

2.4 Master Response UTIL: Utility Availability

Commenters expressed concerns regarding water supply availability and available capacity of wastewater treatment systems.

Please refer to Section 4.18, *Utilities and Service Systems*, for a full analysis of available utilities in the County and the expected impact of the proposed project on such services. As stated therein, it was determined that all impacts related to utilities and service systems would be considered less than significant.

The Draft EIR addressed water supply availability and available capacity of wastewater treatment systems. As described in Section 4.18, *Utilities and Service Systems*, development facilitated by the project on Rezoning Sites would create additional demand for water supply and wastewater capacity in the unincorporated county. Each water service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide water service to the Rezoning Sites. In addition, California American Water – Larkfield prepared a Water Supply Assessment (Appendix WSA) detailing its ability to provide water service to the Rezoning Sites within its service area. With the implementation of proposed capital improvement projects, development facilitated by the project on the Agua Caliente, Glen Ellen, Larkfield, Sonoma, Santa Rosa, Forestville, Graton, Guerneville, Penngrove, and Petaluma Sites would have access to adequate water service. Information was not provided by California American Water – Geyserville. Furthermore, the Rezoning Sites that are not currently directly adjacent to water supply infrastructure (GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4) were not fully evaluated in Appendix WSS for adequate water supply capacity Because development facilitated by the project would occur within designated Urban Service Areas, existing water infrastructure exists at most of the Rezoning Sites. As described above, some sites are not adjacent to existing water pipelines, and could require the construction of expanded water supply facilities, including upgraded pipeline and potentially new pumps, to develop at the densities contemplated by this project. This impact would be potentially significant and Mitigation Measure UTIL-1 would be required.

In addition, as described in Appendix WSS, each wastewater service provider was contacted and assessed in the Water and Sewer Study for its ability to provide wastewater service to the Rezoning Sites. However, the Rezoning Sites that are not currently directly adjacent to wastewater collection infrastructure (pipelines) were not fully evaluated in Appendix WSS for adequate sewer capacity (GEY-1, LAR-7, FOR-1, FOR-2, FOR-6, GRA-4, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4). Therefore, impacts of development on these sites would be significant and Mitigation Measure UTIL-1 would be required. Additionally, the wastewater capacity for sites GUE-1 through GUE-4, GRA-1 through GRA-5[1], and PET-1 through PET-4 is either unknown or limited. These sites would require the construction of expanded wastewater facilities, including upgraded pipelines and potentially new pumps. Generally, the ground disturbance required to construct these upgrades would occur in previously disturbed or developed areas, such as public rights-of-way, reducing the potential for environmental impacts. Compliance with mitigation measures in EIR, including Mitigation Measures BIO-1 through BIO-17, CUL-1 through CUL-9, and TCR-1 through TCR-5, would minimize impacts to sensitive environmental resources where upgrades require off-site construction for the expansion of wastewater services. Therefore, the proposed project would not result in construction or relocation of wastewater facilities such that significant environmental impacts would result.

[1] GRA-4 is located outside the Graton Community Services District (GCSD) service area and sphere of influence, and would require annexation to GCSD, as described in Appendix WSS.

As stated in Section 4.18, *Utilities and Service Systems*, several of the Rezoning Sites are not adjacent to existing water or wastewater infrastructure and require further evaluation at the project level during the plan review and permit approval phase. Mitigation Measure UTIL-1 would be required to reduce impacts related to water supply and wastewater system sufficiency to a less than significant level. With implementation of Mitigation Measure UTIL-1, development on Rezoning Sites GUE-1, GUE-2, FOR-1, FOR-2, FOR-4, FOR-6, GRA-1 through GRA-5, LAR-1 through LAR-8, PEN-2, PEN-4, PEN-9, PET-1, SAN-1, SAN-3, SAN-5 through SAN-8, SAN-10, and SON-1 through SON-4 would be adequately served by water and wastewater service providers. However, there is not substantial evidence to determine that development on Rezoning Sites GEY-1 through GEY-4 would be adequately served by California American Water – Geyserville. Therefore, impacts would be significant and unavoidable

Additionally, after the Final EIR comment period, the County received correspondence from Forestville Water District regarding the District's capacity to serve new development. In a follow-up meeting on May 24, 2023 with the General Manager and the District Engineer, Forestville Water District indicated that the District's current wastewater treatment capacity is unknown, and that unprogrammed improvements to the system will be required to address the District's compliance with Water Board standards for wastewater discharge. Based on this most recent communication, further details and information regarding the District's capacity is not available. Mitigation Measure UTIL-1 would continue to apply to sites as listed in the paragraph above.

Please note that the Draft EIR is not required to reduce all potential impacts to a less than significant level, but is required to discuss available and feasible mitigation measures that could reduce potential impacts. The commenter is correct that the project would result in significant and unavoidable impacts to the environment. To that end, to certify the EIR and approve the project, the County Board of Supervisors would need to adopt a Statement of Overriding Considerations pursuant to *CEQA Guidelines* Section 15093. This statement must explain the County's decision to approve the project that balances the project's economic, legal, social, technological or other benefits against its unavoidable environmental risks.

2.5 Master Response FIRE: Wildfire

Commenters expressed concerns regarding wildfire impacts.

The County acknowledges that there is an existing wildfire risk in various locations throughout the County. However, in *California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal.4th 369* (2015), the California Supreme Court held that CEQA generally does not require analysis of how existing hazards or conditions might impact a project's future users or residents, unless the project might exacerbate existing environmental hazards. Therefore, Section 4.19, *Wildfire*, of the Draft EIR analyzed whether development facilitated by the project on Rezoning Sites may have a significant adverse impact if the Rezoning Sites are in or near (within 2 miles of) SRAs or Very High FHSZs by resulting in any of the following:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire
3. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment

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

The following text provided on page 4.19-28 of the Draft EIR describes the reasoning behind the significant and unavoidable wildfire impact:

> With implementation of Mitigation Measures WFR-1, WFR-2, and WFR-3, the risk of loss of structures and the risk of injury or death due to wildfires would be reduced. These measures would make structures more fire resistant and less vulnerable to loss in the event of a wildfire. These measures would also reduce the potential for construction to inadvertently ignite a wildfire. However, it is not possible to prevent a significant risk of wildfires or fully protect people and structures from the risks of wildfires, despite implementation of mitigation. Thus, this impact would remain significant and unavoidable.

The Draft EIR is not required to reduce all potential impacts to a less than significant level, but is required to discuss available and feasible mitigation measures that could reduce potential impacts. As referenced in the above excerpt from the Draft EIR, Mitigation Measure WFR-1 requires the implementation of wildfire risk reduction measures, Mitigation Measure WFR-2 requires the use of fire-resistant vegetation native to Sonoma County in project landscape plans, and Mitigation Measure WFR-3 implements structure location criteria to reduce the risk of structure damage.

Please note that the Draft EIR is not required to reduce all potential impacts to a less than significant level, but is required to discuss available and feasible mitigation measures that could reduce potential impacts. The commenter is correct that the project would result in significant and unavoidable impacts to the environment. To that end, to certify the EIR and approve the project, the County Board of Supervisors would need to adopt a Statement of Overriding Considerations pursuant to *CEQA Guidelines* Section 15093. This statement must explain the County's decision to approve the project that balances the project's economic, legal, social, technological or other benefits against its unavoidable environmental risks.

2.6 Master Response EMG: Emergency Access

Commenters expressed concerns regarding emergency access to the Rezoning Sites.

As outlined in Section 4.9, *Hazards and Hazardous Materials* (page 4.9-13 of the Draft EIR), there are no proposed physical changes such as roadway construction that would interfere with or impair emergency response or evacuation. The project would not result in changes to emergency evacuation routes, nor would it substantially increase traffic or roadway congestion such that use of an evacuation route would be hindered.

Development facilitated by the project on Rezoning Sites would accommodate future population growth and would increase VMT in the county. This could lead to incrementally increased congestion in some locations during emergency evacuations. However, as described in Impact HAZ-4 (page 4.9-13 of the Draft EIR), the County reviews and approves projects to ensure that emergency access would meet County standards. Future projects facilitated by the project, as well as all development in the County, must comply with road standards and are reviewed by the Permit Sonoma Fire Prevention Division to ensure compliance with state and local Fire Safe Standards, including that development would not interfere with evacuation routes [OBJ]and that roads and driveways provide unobstructed traffic circulation during a wildfire emergency and would not impede the effectiveness of evacuation plans. [OBJ]requirements for the selection and identification of evacuation routes, including criteria based on

relative safety of the roadway infrastructure and existing traffic conditions. The plan covers evacuations due to wildfires, floods, landslide, debris flows, dam failure, tsunamis, chemical spills, and terrorism.

In addition, as noted in Section 4.19, *Wildfire* (pages 4.19-26 of the Draft EIR), access to Rezoning Sites FOR-2, FOR-4, GRA-2, AGU-1, and AGU-2 currently does not meet County road standards of 20 feet in width or greater. Laughlin Road near GUE-1 through GUE-3 does not appear to meet this requirement, and these sites have been added to the list of sites on page 4.19-26. Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways would be required. Those improvements would require a County encroachment permit if on a public right-of-way. Given that specific road widening locations have not been identified, it would be speculative to analyze potential impacts at this time. However, if it is determined that road widening is needed to access Rezoning Sites for future development, road widening would require site-specific CEQA compliance that could include additional mitigation measures for aesthetics, and biological resources, cultural and tribal cultural resources, among other issues.

Please refer to Impact WFR-1 on page 4.19-24 of the Draft EIR, which describes the project's potential impacts related to impairment of adopted emergency response or emergency evacuation plans. As stated therein, the County's Emergency Operations Plan (2014) identifies main transportation routes, including Highway 101, State Route 12, State Route 116, State Route 37, State Route 128, and State Route 1. State Route 116 provides north-south connectivity between Forestville, Graton, and Sebastopol. Impact WFR-1 states:

> While the increase in population that would result from project implementation is beyond County General Plan growth projections, the county is experiencing an overall housing shortage and has identified a need for new housing in areas already designated for urban growth. The project would be consistent with this identified housing need and the newly adopted RHNA allocation, as described in Section 4.14, *Population and Housing*. The project would help to meet the County's housing need and would be consistent with its RHNA allocation for the 6th Housing Element cycle. The Rezoning Sites are located in existing service areas and are adequately served by emergency services, and the population growth in these areas would not put unanticipated strain on emergency evacuations plans or routes. Therefore, the population increase encouraged by the project would not impair adopted emergency response and emergency evacuation plans. Additionally, as described in Section 4.15, *Public Services and Recreation*, the project would not result in the need for new or expanded emergency services, including police and fire protection. Therefore, the implementation of emergency response procedures would not be affected. The County's Emergency Operations Plan establishes the emergency management organization for emergency response, establishes operational concepts associated with emergency management, and provides a flexible platform for planning emergency response in the county. Development facilitated by the project on Rezoning Sites would be constructed in accordance with federal, state, regional, and local requirements, which are intended to ensure the safety of county residents and structures to the extent feasible. Compliance with these standard regulations would be consistent with the County's Emergency Operations Plan. The project would not impair an emergency response or emergency evacuation plan and impacts would be less than significant.

While not required to mitigate a CEQA impact, the County is adopting a standard condition of approval for development facilitated by the project on Rezoning Sites that for projects in a high or very high fire hazard severity zone, there must be at least two points of ingress/egress.

2.7 Master Response TRA: Traffic Congestion

Commenters expressed concerns regarding traffic congestion and level of service (LOS).

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law. SB 743 changed the way transportation impact analysis is conducted as part of CEQA compliance. These changes eliminated automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA.

Prior to SB 743, CEQA analysis typically treated automobile delay and congestion as an environmental impact. Instead, SB 743 requires the *CEQA Guidelines* to prescribe an analysis that better accounts for transit and reducing greenhouse gas emissions. In November 2017, the Governor's Office of Planning and Research (OPR) released the final update to *CEQA Guidelines* consistent with SB 743, which recommend using vehicle miles traveled (VMT) as the most appropriate metric of transportation impact to align local environmental review under CEQA with California's long-term greenhouse gas emissions reduction goals. The Guidelines required all jurisdictions in California to use VMT-based thresholds of significance by July 2020. Because LOS impacts are no longer considered significant impacts under CEQA, therefore, traffic congestion-related mitigation measures are not required. Therefore, traffic congestion was not analyzed in the Draft EIR based on this state law. Refer to Section 4.16, *Transportation*, of the EIR for more transportation analysis.

However, Appendix TRA of the Draft EIR includes an LOS-based congestion analysis for informational purposes. Please refer to Appendix TRA of the Draft EIR for congestion effects at specific intersections near the Rezoning Sites. As described therein, no near-term congestion improvements would be necessary as a result of the project; however, fair share funding of cumulative scenario traffic congestion improvements would be necessary.

3 Written Comments and Responses

This chapter includes written comments received during the circulation of the Draft EIR prepared for the Sonoma County Housing Element Update Project, and responses to those comments.

The Draft EIR was made available for public review for a 55-day comment period that began on December 28, 2022 and ended on February 23, 2023. Sonoma County received 275 comment letters on the Draft EIR. The commenters and the page number on which each commenter's letter appear are listed in the table below.

O-2	Trish Tatarian, Conservation Co-Chair, Milo Baker Chapter of the California Native Plant Society
O-3	Lucy Hardcastle, President, Forestville Planning Association Board of Directors
O-4	Gary Harris, Forestville Chamber of Commerce
1	Rebecca Mateja
2	Greg Tatarian
3	Brian Bollman
4	Josette Brose-Eichar
5	Jim Bell
6	Matt O'Donnell
7	Rick Maifeld
8	Stacie Gradney
9	Colin Baptie
10	Elissa Rubin-Mahon
11	Becky Boyle
12	Jim Severdia
13	Kim Thatcher
14	Jonathan Teel
15	Jamie S.
16	Sean Maley
17	Sue Zaharoff
18	Arelene Warner
19	Neil Shevlin
20	Becky Boyle
21	Janice Stenger
22	Dan O'Leary
23	Karyn Pulley
24	Chris Bross
25	Cindy Romero

Letter No. and Commenter	
26	Daneene Bell
27	Denise Mobley
28	Leila Anderson
29	No Name – Letter with Signature Sheet
30	Meagan Nolan
31	Neil Shevlin
32	Oscar Ayala
33	Rio Olesky
34	Sally Percich
35	Sean Maley
36	Janice Stenger
37	Kelly Joyce
38	Louis Hughes
39	Lucy Hardcastle
40	Mary Mount
41	Nick Pulley
42	Tim Pariarca and James W.
43	Adele Westling
44	Andrea Oreck
45	Becky Boyle
46	Durs Koenig
47	Geary Do
48	Mary Helt
49	Roberta Schepps
50	Stacie Gradney
51	Sydne Acks
52	Linda Hunter
53	Lynn Woolley
54	Lynn Woolley
55	Micahel Gomez
56	Olga Gishizky
57	Patricl Reesnik
58	Robin Bens
59	Sandra Reilly
60	Patricia Kremer

Letter No.	and Commenter
61	Patti Sinclair
62	Robert Grandmaison
63	Susan Ament
64	Janice Stenger
65	John Ryan
66	Kenneth Billheimer
67	Maggie Mayo
68	Patricia Kremer
69	Stacie Gradney
70	Vicki A. Hill
71	William Helt
72	Anne Marie and Eugene Calhoun
73	Becky Boyle
74	Betty Brachman
75	Dan O'Leary
76	G.W. Duvall
77	Karyn Pulley
78	Kon Zaharoff
79	Larry Martin
80	Marilyn and David Kinghorn
81	Scott Lietzke
82	Stephanie Blumenthal
83	Alicia Chazen
84	Amanda Shone
85	Angelica Jochim
86	Arleen Zuniga
87	Cailin Marigold
88	Christopher DeWolf
89	Frank Zanca
90	Herman J. Hernandez
91	Jonathan Teel
92	Laurel Anderson
93	Leigh Hall
94	Michael Cuoio
95	Rick Sanfilipo
96	Robert Grandmaison
97	Ashley Nolan
98	Doug Thorogood
99	Jeanne Reggio

Letter No.	and Commenter
100	Kenneth Koutz
101	Leo Chyi
102	Mark Ballard
103	Mary Mount
104	Michael Korreng
105	Paige MacDonnel
106	Patrick Waters
107	Paul Paddock
108	Rick Harrington
109	Sandy Strassberg
110	Sharon Smith and David Watson
111	Suan and Ron Reed
112	Brad Wallace
113	Cassandra Shafer
114	David Kristof
115	Melody Clark
116	Kris Nevius
117	No Name – Letter with Signature Sheet
118	Lorin and Rebecca McClendon
119	Mark Dutina
120	Kathy Rodriguez
121	Mike Bojanowsk
122	Mona Behan and Alan Crisp
123	Nancy Dempster
124	Robert Davis
125	Vikki Miller
126	Adele Turk
127	Alice Horowitz
128	Anna Narbutovkih
129	Becky Boyle
130	Becky Boyle
131	Becky Boyle
132	C.L. Tree
133	C.L. Tree
134	C.L. Tree
135	Cheryl A. Franzini
136	Francisco Saiz Norma Saiz, Richard Halgren, Julie Clark, Gino Franceschi, and Karen Franceschi ,
137	Joseph and Deborah Votek

Letter No.	and Commenter
138	Kate Farrell
139	Larry Loebig
140	Larry Boebig
141	Larry Loebig
142	Larry Loebig
143	Larry Loebig
144	Larry Loebig
145	Nina Rosen
146	Richard Evangelisti
147	Rodney E. O'Neal
148	Rory Pool
149	Stacie Gradney
150	Tammy Melton
151	Greg Carr
152	Alanna Spencer
153	Ann Dexheimer
154	Arlene Irizary
155	Arlene Irizary
156	Brice Dunwoodie
157	Celeste Johansson
158	Grace Knight
159	Jeanne Reggio
160	Joshua Peterson
161	Kenneth Smith
162	Laura Hanson
163	Louis Hughes
164	Mart Anne Gustafson
165	Omar Percchich and Kelly Joyce-Perchich
166	Renee Tchirkine
167	Robert Grandmaison
168	Roger Peters
169	Ron Redmon
170	Sachiko Williams
171	Sally Olson
172	Soichiro Takahashi
173	Tara Underly
174	Vesta Copestakes
175	Vikki Miller

Letter No.	and Commenter
176	William McAfee
177	Aaron Dornstreich
178	Aaron Dornstreich
179	Aaron Dornstreich
180	Aaron Dornstreich
181	Aaron Dornstreich
182	Aaron Dornstreich
183	Aaron Dornstreich
184	Aaron Mason
185	Amber and Todd Grey
186	Anna Hayman
187	Anne Kuschner
188	Aram Sarkissian
189	Aram Sarkissian
190	Aram Sarkissian
191	Aram Sarkissian
192	Arch Zellick and Mary Neuberger
193	Audrey Kung
194	Barbara Delonno
195	Bill Avellar
196	Bob and Lucy Hardcastle
197	Bonnie Smith
198	Brenda Stivers
199	Burt Cohen
200	Charles and Anne Watson
201	Chris Romano
202	Christine Johansson
203	Cynthis Berman
204	Dan and Sunoma Northern
205	Dane Riley
206	Daniel Bontecou
207	Dave Doty
208	Dave Gebow
209	Davin Goldstein
210	Dennis O'Rourke
211	Dennis Sharp
212	Diana Hindley
213	Don Jackson

Letter No.	and Commenter
214	Eliszabeth Westerfield
215	Erin Jones
216	Gillian Hayes
217	Greg Guerrazzi
218	Harriet Katz
219	Janice Stenger
220	Janice Stenger
221	Jared McConnell
222	Jaye Griffiths
223	Jim Smith
224	John Kiriakopolos
225	Joshua Beniston
226	Judith Farina
227	K. Brooks
228	Kat Deaner
229	Kon Zaharoff
230	Leslie Markham
231	Lindsey Sullivan
232	Lisa Nahmanson
233	Lois Pearlman
234	Larna Catford
235	Madeline Solomon
236	Marci Mascorro
237	Marilyn Cannon
238	Mark Berry
239	Mark Molofsky
240	Mary Clare Cawley
241	Megan Cohen
242	Melissa Kemp
243	Micahel Kane
244	Michael Nichols
245	Mike and Susan Ryan
246	Michell S. Genser
247	No Name
248	Patricia Brunelle
249	Roberta Schepps
250	Robin Shopbell
251	Sabrina Zola

Letter No.	and Commenter
252	Scott Ruthrauff
253	Soichiro Takahashi
254	Steve and Andrea Perry
255	Susan Mulcahy
256	Susan Zielger
257	Suzi Molofsky
258	Tamara Sarkissian
259	Tamara Sarkissian
260	Tamara Sarkissian
261	Tamara Sarkissian
262	Tim and Kathy Dellinger
263	Toby Barber
264	Vikki Miller
265	Wayne Weeks
266	Andy and Renee Tchirkine
267	Anita Das
268	Caitlin Marigold
269	Janice Stenger
270	Tre Gibbs
271	Rick Savel

The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1). Comments received from agencies are labeled with an “A” preceding the first number of the comment letter and the number assigned to each issue (e.g. A-1.1), and comments received from organizations are labeled with an “O” preceding the first number of the comment letter and the number assigned to each issue (e.g., O-1.1).

EIR Agency Comment A-1

COMMENTER: Erin Chappell, Regional Manager, California Department of Fish and Wildlife Bay Delta Region

DATE: February 8, 2023

Response A-1.1

The commenter states that the California Department of Fish and Wildlife (CDFW) is considered as both a Trustee Agency and a Responsible Agency.

The comment is noted. The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

Response A-1.2

The commenter states that the project has the potential to result in take of plants and/or animals listed under the California Endangered Species Act (CESA). The commenter opines that a CESA Incidental Take Permit (ITP) must be obtained and encourages early consultation due to the possibility of significant modification to the project and mitigation measures in order to obtain a CESA Permit.

The comment is noted. Please see Responses A-1.7 and A-1.8 regarding special-status plant species.

Response A-1.3

The commenter states that the project would impact streams and therefore a Lake and Streambed Alteration (LSA) Notification(s) may be required and obtained from the CDFW.

The comment is noted. Please refer to Response A-1.14 regarding potential impacts to streams.

Response A-1.4

The commenter states that the CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds, and that migratory birds are also protected under the federal Migratory Bird Treaty Act.

The comment provides potential applicants with information on protections for nesting and migratory birds and does not pertain to the adequacy of the Draft EIR. The EIR notes the federal Migratory Bird Treaty Act in the section covering federal regulations in Section 4.2.2 of Section 4.2, *Biological Resources*, of the Draft EIR. The comment is noted, and no response is required.

Response A-1.5

The commenter provides a summary of the project, the project's location, and the project's timeframe.

The comment is noted. The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

Response A-1.6

The commenter states that an EIR is appropriate for the project based on the project's avoidance of significant impacts on biological resources with implementation of mitigation measures.

The comment is noted. The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

Response A-1.7

The commenter states that Mitigation Measure BIO-2 of the Draft EIR may not reduce impacts to CESA listed and other special-status plant species to less-than-significant. The commenter opines that the appropriate survey methodology, specific protocols, and adequate review and approval by CDFW are not included in Mitigation Measure BIO-2 and recommends altering the measure to incorporate the CDFW edits to ensure impacts are less than significant.

While Mitigation Measure BIO-2 of the Draft EIR would be sufficient to ensure special-status plant species surveys are conducted such that impacts to federally or state-listed plants or species with a CRPR of 1B or 2B are reduced, revisions have been made to incorporate the commenter's recommendations into Mitigation Measure BIO-2. Changes to Mitigation Measure BIO-2 do not rise to the level of "new information" as defined in Section 15088.5 of the *CEQA Guidelines*, and thus recirculation of the Draft EIR is not required. Page 4.4-30 of the Final EIR has been revised with the following (changes shown in strikeout/underline):

BIO-2 Special Status Plant Species Surveys.

If the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) determines that there is potential for ~~significant~~ impacts to federally or state-listed plants or ~~regional population level impacts to~~ species with a CRPR of 1B or 2B from project development, a qualified biologist shall complete surveys for special status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). Surveys shall be conducted following CDFW's 2018 Protocol for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants) and, as applicable, the Santa Rosa Plain Conservation Strategy Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain, including, but not limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts, such as altering off-site hydrological conditions where these species may be present, or any formal updates of these protocols. The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species identified in the project-specific biological analysis. All plant surveys shall be conducted by a qualified biologist during the blooming season prior to initial ground disturbance. More than one year of surveys may be required to establish that plants are absent, and the above Santa Rosa Plain Conservation Strategy Appendix D requires a minimum of two years of surveys, which shall be implemented unless otherwise approved in writing by CDFW. All special status plant species identified on site shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the County, and the CDFW and/or USFWS, as appropriate, for review and/or approval. The project shall obtain written approval of the survey reports from CDFW prior to the start of construction, unless otherwise approved in writing by CDFW. If any special-status plants are observed, the Project shall: 1) avoid all direct and indirect impacts to the special-status plants, and 2) prepare and implement an avoidance plan that is approved in writing by CDFW prior to Project start. If CESA listed plants are observed and impacts cannot be avoided, the Project shall obtain a

CESA ITP from CDFW. For impacts to federal Endangered Species Act (ESA) listed plants, the Project shall obtain authorization from USFWS.

Response A-1.8

The commenter opines that Mitigation Measure BIO-4 under Section 4.4, pages 4.4-30 and -31 of the Draft EIR, may not reduce impacts to CESA listed and other special-status plant species to less-than-significant levels because mitigation ratios for impacts to CESA listed plants are not included. The commenter acknowledges that Mitigation Measure BIO-4 includes a restoration ratio of 1:1 for impacts to these species but opines that this may result in significant net loss of the impacted plant species and that higher ratios are often applied.

As described in Mitigation Measure BIO-4, mitigation would be required at a ratio no less than 1:1 for impacts to special-status plant species. The commentor is correct in stating that this compensatory mitigation is often required at a higher ratio, but this is determined on a project-specific basis in coordination with CDFW and USFWS, as applicable. Applying a 3:1 ratio for all projects under the Housing Element Update would limit the project proponent the flexibility to determine mitigation ratios with respect to quality of existing habitat at a given site. With this flexibility in mind, revisions have been made to Mitigation Measure BIO-4 for added clarity and to incorporate recommended language provided by CDFW. However, the minimum mitigation ratio for impacts to special-status plants remains at 1:1. Changes to Mitigation Measure BIO-4 do not rise to the level of "new information" as defined in Section 15088.5 of the *CEQA Guidelines*, and thus recirculation of the Draft EIR is not required. Pages 4.4-30 and -31 of the Final EIR has been revised with the following (changes shown in strikeout/underline):

BIO-4 Restoration and Monitoring, and Habitat Compensation.

Development and/or restoration activities shall be conducted in accordance with a site-specific Habitat Restoration Plan. If federally or state-listed plants or non-listed special status CRPR 1B and 2 plant populations cannot be avoided, and will be impacted by development, all impacts shall be mitigated by the applicant at a ratio not lower than 1:1 and to be determined by the County (in coordination with CDFW and USFWS as ~~and if~~ applicable) for each species as a component of habitat restoration, unless otherwise approved in writing by CDFW. For impacts to state-listed plants, habitat compensation at a minimum 1:1 mitigation to impact ratio shall be provided, which may include either the purchase of credits at a CDFW-approved mitigation or conservation bank or purchasing appropriate habitat and conserving it in perpetuity through a conservation easement and management plan, which shall be prepared, funded, and implemented by the Project in perpetuity, unless otherwise approved in writing by CDFW. A qualified biologist shall prepare and submit a restoration plan to the County and CDFW for review and approval. (Note: if a federally and/or state-listed plant species will be impacted, the restoration plan shall be submitted to the USFWS and/or CDFW for review, and federal and/or state take authorization ~~may~~ will be obtained from ~~required by~~ these agencies.) The restoration plan shall include, at a minimum, the following components […]

Response A-1.9

The commenter opines that Mitigation Measure BIO-5 under Section 4.4, page 4.4-31 of the Draft EIR, may not reduce impacts to CTS to less-than-significant levels because adequate survey and habitat compensation requirements for impacts to CTS are not included.

Mitigation Measure BIO-5 requires that for projects located within the Santa Rosa Plain Area, surveys must be conducted in accordance with CDFW, National Marine Fisheries Service (NMFS), and/or USFWS protocols prior to issuance of any construction permits. While Mitigation Measure BIO-5 of the Draft EIR would be sufficient to ensure CTS surveys are conducted in accordance with agency protocols, revisions have been made to incorporate the commenter's recommendations into Mitigation Measure BIO-5 for clarity and to ensure habitat compensation requirements are specified. Changes to Mitigation Measure BIO-5 do not rise to the level of "new information" as defined in Section 15088.5 of the *CEQA Guidelines*, and thus recirculation of the Draft EIR is not required. Page 4.4-31 of the Final EIR has been revised with the following (changes shown in strikeout/underline):

BIO-5 Endangered/Threatened Species Habitat Assessments and Protocol Surveys, CDFW and USFWS Authorization and Habitat Compensation

Specific habitat assessments and survey protocols are established for several federally- and state-listed endangered or threatened species. If the results of the project-specific biological analysis determine that suitable habitat may be present for any such species, protocol habitat assessments/surveys shall be completed in accordance with CDFW, NMFS, and/or USFWS protocols prior to issuance of any construction permits. If projects are located within the Santa Rosa Plain Area, surveys shall be conducted for CTS in accordance with the Santa Rosa Plain Conservation Strategy (2005) with prior written approval from CDFW and USFWS. Due to numerous documented occurrences of CTS in the Santa Rosa Plain in conjunction with the documented dispersal distances for the species of up to 1.3 miles, it has been established that CTS are present within many grassland and vernal pool habitats within the Santa Rosa Plain rendering surveys unnecessary, and therefore any protocol CTS surveys shall be approved in writing by CDFW and USFWS prior to conducting the survey and habitat compensation for impacts to CTS habitat shall be provided by the Project pursuant to the Santa Rosa Plain Conservation Strategy even if survey results are negative, unless otherwise approved in writing by CDFW and USFWS. If impacts to grassland or vernal pool habitat will occur, the Project shall consult with CDFW to determine if a CESA ITP for CTS is warranted. If CESA listed animal species such as CTS cannot be avoided, the Project shall obtain a CESA ITP from CDFW prior to Project construction. For impacts to ESA listed wildlife species such as CTS, the Project shall obtain authorization from USFWS. While often consistent with the Santa Rosa Plain Conservation Strategy, the CESA ITP habitat compensation requirements may differ from it based on a site-specific analysis. If through consultation with the CDFW, NMFS, and/or USFWS it is determined that protocol habitat assessments/surveys are not required, the applicant shall complete and document this consultation and submit it to the County prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they understand the protocol requirements and shall hire a qualified biologist to conduct protocol surveys.

Response A-1.10

The commenter opines that Mitigation Measure BIO-6 under Section 4.4, pages 4.4-31 through -33 of the Draft EIR, may not reduce impacts to endangered or threatened animal species such as Coho salmon and steelhead and their habitats to less-than-significant levels because adequate mitigation measures to avoid seasonally timed migration of salmonids are not included.

As described in Mitigation Measure BIO-6, projects occurring within/adjacent to aquatic habitats shall be restricted to completion between April 1 and October 31 to avoid impacts to sensitive aquatic species. This seasonal work window is intended to coincide with the dry season while also allowing for an adequate and realistic window for construction activities to occur. Mitigation Measure BIO-6 is also intended to be applied to projects evaluated in the Project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1. This initial project specific assessment would identify sensitive aquatic habitat features versus those that do not support wildlife that may potentially benefit from limiting the work window. As such, reducing the work window to June 15 to October 15, as recommended by the measure proposed by CDFW, would be determined as appropriate during the project specific evaluation and through coordination with permitting agencies. As such, no revisions to the Draft EIR are required in response to this comment.

Response A-1.11

The commenter recommends adding further species-specific mitigation measures to reduce impacts to CESA listed species to less-than-significant levels. These measures address "no-disturbance" to California Freshwater Shrimp Habitat, Swainson's hawk protocol surveys and avoidance, northern spotted owl surveys and avoidance, and tricolored blackbird surveys and avoidance.

As the Draft EIR is a programmatic-level evaluation of biological impacts, Mitigation Measure BIO-1 requiring biological resources screening and assessments for projects that involve ground disturbance would determine whether specific projects have potential to impact special status biological resources including CESA listed species. Following this project-specific assessment, several measures included in the Draft EIR would be incorporated as applicable to address potential impacts to these species. For instance, Mitigation Measure BIO-5 requires that where the project-specific biological analysis has identified suitable habitat for federally- and/or state-listed species, protocol habitat assessment/surveys shall be completed in accordance with CDFW, NMFS, and/or USFWS protocols prior to issuance of construction permits. Additionally, several avoidance and minimization measures are listed in Mitigation Measure BIO-6 to ensure impacts to listed species are reduced to less-than-significant levels. Finally, Mitigation Measure BIO-10 requires projects that involve construction, grading, vegetation removal, or other project-related improvements to conduct nesting bird surveys during the nesting season (between February 1 to September 15). Therefore, impacts to these CESA listed species would be appropriately mitigated for under the Draft EIR, and surveys beyond the preconstruction nesting bird surveys required by Mitigation Measure BIO-10 (refer to Response A-1.13 for revisions to this measure) are not warranted. As such, no revisions to the Draft EIR are required in response to this comment.

Response A-1.12

The commenter provides comments on Section 4.4, page 4.4-33 and page 4.4--34, of the Draft EIR. The commenter states that the project is within the wintering distribution of burrowing owl in Sonoma County. The commenter opines that Mitigation Measure BIO-7 of the Draft EIR may not reduce impacts to wintering burrowing owl to less-than-significant levels because adequate avoidance and mitigation measures are not included. The commenter states that burrowing owl is a California Species of Special

Concern, therefore, if wintering burrowing owls are present on or adjacent the project site, project impacts to burrowing owl would be potentially significant. The commenter recommends adding the mitigation measure proposed by the CDFW to the Draft EIR to ensure impacts are less than significant.

As described above under Response A-1.11, the Draft EIR is a programmatic-level evaluation of biological impacts and Mitigation Measure BIO-1 of the Draft EIR requires biological resources screening and assessments for projects that involve ground disturbance. This initial assessment would determine whether specific projects have potential to impact special status biological resources including burrowing owl and other California Species of Special Concern. Following this project-specific assessment, several measures included in the Draft EIR would be incorporated as applicable to address potential impacts to these species. Mitigation Measure BIO-5 requires that where the project-specific biological analysis has identified suitable habitat for special-status species, protocol habitat assessment/surveys shall be completed in accordance with CDFW, NMFS, and/or USFWS protocols prior to issuance of construction permits. This would include implementation of surveys for burrowing owl following the 2012 *Department of Fish and Game Staff Report on Burrowing Owl Mitigation* survey methodology.

Finally, Mitigation Measure BIO-10 requires projects that involve construction, grading, vegetation removal, or other project-related improvements to conduct nesting bird surveys during the nesting season (between February 1 to September 15). Therefore, impacts to wintering burrowing owls would be appropriately mitigated for under the Draft EIR, and surveys beyond the protocol level surveys required by Mitigation Measure BIO-5 and preconstruction nesting bird surveys required by Mitigation Measure BIO-10 (refer to Response A-1.13 for revisions to this measure) are not warranted. As such, no revisions to the Draft EIR are required in response to this comment.

Response A-1.13

The commenter comments on Section 4.4, page 4.4-35, of the Draft EIR. The commenter opines that Mitigation Measure BIO-10 may not be adequate to avoid impacts to special-status and common nesting raptors such as the white-tailed kite as adequate survey areas and avoidance buffers are not included. The commenter recommends revising Mitigation Measure BIO-10 in the Draft EIR with the mitigation measure proposed by the CDFW to ensure impacts are less than significant.

While Mitigation Measure BIO-10 of the Draft EIR would be sufficient to preclude impacts to nesting birds that nest in vegetation such as trees and shrubs, revisions have been made to incorporate the commenter's recommendations into Mitigation Measure BIO-10 for clarity and to ensure survey buffers are appropriate. However, the survey window prior to construction has been retained at 14 days to allow project proponents enough time to coordinate with qualified biologists to conduct appropriate surveys at individual project sites. Changes to Mitigation Measure BIO-10 do not rise to the level of "new information" as defined in Section 15088.5 of the *CEQA Guidelines*, and thus recirculation of the Draft EIR is not required. Page 4.4-35 of the Final EIR has been revised with the following (changes shown in ~~strikeout~~/underline):

BIO-10 Pre-Construction Surveys for Nesting Birds for Construction Occurring within Nesting Season.

For projects that require construction, grading, the removal of trees or vegetation, or other project-related improvements, construction activities shall occur outside of the nesting season (September 16 to January 31), and no mitigation activity is required. If construction activities must occur during the nesting season (February 1 to September 15), a qualified biologist shall conduct surveys for nesting birds ~~covered by the CGFC no~~

~~more than~~ within 14 days prior to project activities ~~vegetation removal~~ and shall conduct additional surveys if there is a lapse of 14 days or more in construction activities. The surveys shall include the entire disturbance area plus at least a ~~200~~ 500-foot buffer around the project site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of ~~50~~ 250 feet for non-raptor bird species and at least ~~150~~ 500 feet for raptor species, unless determined otherwise by the qualified biologist. Buffer distances for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distances shall be specified to protect the bird's normal behavior thereby preventing nesting failure or abandonment. The buffer distance recommendation shall be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The qualified biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer is established. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. The biologist shall submit a report of these preconstruction nesting bird surveys to the County to document compliance within 30 days of its completion.

Response A-1.14

The commenter comments on Section 4.4, page 4.4-37, of the Draft EIR. The commenter states and opinion that Mitigation Measure BIO-14 included in the Draft EIR may not reduce impacts to riparian habitat to less-than-significant levels. The commenter also states that the project may result in a violation of Fish and Game Code section 1600 et seq. as the Draft EIR does not require projects to submit an LSA Notification to CDFW and comply with the related LSA Agreement, if issued. The commenter also opines that Mitigation Measure BIO-14 does not require an adequate mitigation to impact ratio based on acreage and linear feet of impacts to riparian habitat to off-set potential losses or adequate revegetation ratios for riparian tree removal. The commenter recommends that the Draft EIR incorporate the revisions to Mitigation Measure BIO-14 proposed by the CDFW to the Draft EIR to ensure impacts are less than significant.

As described under Mitigation Measure BIO-15 of the Draft EIR, if potentially jurisdictional features are identified by the project specific Biological Resources Screening and Assessment under Mitigation Measure BIO-1, a qualified biologist will prepare a jurisdictional delineation. Following the delineation, a preliminary delineation report will be submitted to the County, USACE, RWQCB, and CDFW, as appropriate, for review and approval. Under Mitigation Measure BIO-15, if CDFW asserts its jurisdictional authority, then a LSA Agreement pursuant to Section 1600 et seq. of the CFGC would also be required prior to construction within the areas of CDFW jurisdiction and implementation of the measures set forth by CDFW during the permitting process would be required.

As described in Mitigation Measure BIO-14, habitat mitigation would be required at a ratio no less than 1:1 for impacts to sensitive natural communities including riparian areas and waters of the state or waters of the U.S. While a 3:1 mitigation ratio may be desirable for permitting agencies, this is determined on a project-specific basis in coordination with CDFW, USFWS, RWQCB, and USACE, as applicable. Applying a 3:1 ratio for all projects under the Housing Element Update would limit the project proponent the flexibility to determine mitigation ratios with respect to quality of existing habitat at a given site. With this flexibility in mind, revisions have been made to Mitigation Measure BIO-14 for added clarity and to incorporate recommended language provided by CDFW. However, the minimum mitigation ratio for impacts to sensitive natural communities including riparian areas and waters of the state or waters of the U.S remains at 1:1. Changes to Mitigation Measure BIO-14 do not rise to the level of "new information" as defined in Section 15088.5 of the *CEQA Guidelines*, and thus recirculation of the Draft EIR is not required. Page 4.4-37 of the Final EIR has been revised with the following (changes shown in strikeout/underline):

BIO-14 Permitting and Restoration for Impacts to Sensitive Natural Communities, Waters, and Wetlands

Impacts to sensitive natural communities (including riparian areas and waters of the state or waters of the U.S. under the jurisdiction of the CDFW, USFWS, ~~or~~ RWQCB, or USACE) shall require that the Project: 1) submit an LSA Notification to CDFW (for impacts to streams or lakes and associated riparian habitat) and comply with the Final LSA Agreement, and 2) obtain authorization from RWQCB and the USACE (for impacts to Waters of the U.S. or State including wetlands pursuant to the Clean Water Act). Impacts shall be mitigated as required by agency permits and at a minimum 1:1 mitigation impact ratio through the funding of the acquisition and in-perpetuity management of similar habitat, in-kind credits purchased from a conservation or mitigation bank, or on-site or off-site habitat restoration based on area and linear distance for permanent impacts, unless otherwise approved in writing by the agencies. Temporary impacts shall be restored on-site. The applicant shall provide funding and management of off-site mitigation lands through purchase of credits from an existing, approved mitigation bank or land purchased by the County and placed into a conservation easement or other covenant restricting development (e.g., deed restriction). Internal mitigation lands (internal to the Rezoning Sites), or in lieu funding sufficient to acquire lands, shall provide habitat at a minimum 1:1 ratio for impacted lands, comparable to habitat to be impacted by individual project activity. The applicant shall submit documentation of mitigation funds to the County. Please be advised that CDFW may not accept in-lieu fees as an appropriate method to mitigate impacts to streams or lakes and associated riparian habitat.

1. Restoration and Monitoring. If sensitive natural communities cannot be avoided and will be impacted by future projects, a compensatory mitigation program shall be implemented by the applicant in accordance with Mitigation Measure BIO-4 and the measures set forth by the regulatory agencies during the permitting process. All temporary impacts to sensitive natural communities shall be fully restored to natural condition.

2. Sudden Oak Death. The applicant shall inspect all nursery plants used in restoration for sudden oak death. Vegetation debris shall be disposed of properly and vehicles and equipment shall be free of soil and vegetation debris before entering natural habitats. Pruning tools shall be sanitized.

Habitat restoration shall occur in the same calendar year as the impact onsite or as close to the site as possible within the same stream or watershed and may consist of restoration or enhancement of riparian habitat. If mitigation is not possible within the same stream or watershed, mitigation ratios may increase at the discretion of CDFW.

To mitigate for the removal of trees, replacement trees shall be planted at the below minimum replacement to removal ratios:

- 1:1 for removal of non-native trees;
- 1:1 for removal of native trees other than oak (Quercus sp.) up to 3 inches diameter at breast height (DBH);
- 3:1 for removal of native trees other than oak 4 to 6 inches DBH;
- 6:1 for removal of native trees other than oak greater than 6 inches DBH;
- 4:1 for removal of oak trees up to 6 inches DBH;
- 5:1 for removal of oak trees greater than 6 inches to 15 inches DBH; and
- 10:1 for removal of oak trees greater than 15 inches in diameter

Replacement tree plantings shall consist of five-gallon or greater saplings and locally-collected seeds, stakes, or other suitable nursery stock as appropriate, and shall be native species to the area adapted to the lighting, soil, and hydrological conditions at the replanting site. If acorns are used for oak tree replanting, each planting will include a minimum of three acorns planted at an approximately two-inch depth to minimize predation risk. Large acorns shall be selected for plantings. Replacement oaks shall come from nursery stock grown from locally-sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they are planted.

The Project shall monitor and maintain, as necessary, all plants for five years to ensure successful revegetation. Planted trees and other vegetation shall each have a minimum of 85 percent survival at the end of five years. If revegetation survival and/or cover requirements do not meet established goals as determined by CDFW, the Project is responsible for replacement planting, additional watering, weeding, invasive exotic eradication, or any other practice, to achieve these requirements. Replacement plants shall be monitored with the same survival and growth requirements for five years after planting.

Response A-1.15

The commenter states that an LSA Agreement obtained for the project would likely require the recommended mitigation measures provided by CDFW, as applicable.

The comment is noted. The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

Response A-1.16

The commenter asks that any special-status species and natural communities detected during project surveys be reported to California Natural Diversity Database (CNDDB).

The comment is noted. Any special-status species and natural communities detected during project surveys will be sent to the CNDDB for reporting. The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

Response A-1.17

The commenter states that the project would have an impact on fish and/or wildlife and an assessment of environmental document filing fees is necessary. The commenter also states that the payment of environmental document filing fee is required for the project approval to be operative, vested, and final.

The comment is noted. The applicant will submit applicable environmental document filing fees upon filing of the Notice of Determination. The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

EIR Organization Comment O-1

COMMENTER: Trish Tatarian, Conservation Co-Chair, Milo Baker Chapter of the California Native Plant Society

DATE: January 25, 2023

Response O-1.1

The commenter offers thanks for the opportunity to comment on the Draft EIR. The commenter states that the Milo Baker Chapter of the California Native Plant Society is dedicated to protecting native plants and habitats in Sonoma County and is interested in protective measures for these resources. The commenter therefore requests that several issues with the Draft EIR are addressed. The commenter states an understanding that the Draft EIR is intended to allow for rezoning to allow new housing. The commenter states an opinion that not enough examination of the Rezoning Sites occurred as a part of the biological analysis in the Draft EIR. The commenter opines that special-status species may be overlooked on sites included in the Draft EIR. The commenter requests that this is addressed in the Draft EIR.

As described under Section 1.2 of the Draft EIR, on page 1-1, this Draft EIR is a programmatic document, presenting a regionwide assessment of the impacts of the proposed project. As such, analysis of site-specific impacts of individual projects is not required at this time in the programmatic EIR, unless components of the program are known in sufficient detail. Due to the high-level planning effort for the project, this programmatic Draft EIR serves as a first tier CEQA environmental document which will support second-tier environmental documents, if required, for development facilitated by the project on any of the 59 Rezoning Sites. To that end, individual specific environmental analysis of each project will be performed as necessary by the County prior to each project being considered for approval. This would include adherence to Mitigation Measure BIO-1 of the Draft EIR, requiring a qualified biologist to perform a biological resources screening and assessment for projects that would result in ground disturbance through clearing/grading or vegetation trimming or removal (e.g., demolition of existing buildings and redevelopment construction, etc.). Following this initial project-specific assessment, additional measures would be required as needed. Therefore, site-specific biological assessments would be required under the Draft EIR. As such, no revisions to the Draft EIR are required in response to this comment.

Response O-1.2

The commenter opines that several Rezoning Sites identified in the Draft EIR require further analysis. The commenter states a concern that these Rezoning Sites will not receive further analysis because of previous evaluation as a part of the Draft EIR. The commenter provides an example of Rezoning Site GUE-4, stating that this site is in the riparian zone of Fife Creek. The commenter opines that with climate change, Fife Creek likely will flood and recommends that appropriate setbacks be applied to riparian areas to account for climate change effects. The commenter states an opinion that the current setbacks applied by the County for streams would be inadequate, and that this should be addressed in the Draft EIR.

Regarding concerns about further environmental analysis for the Rezoning Sites, the commenter is asked to please refer to Response O-1.1 above for a detailed description of the site-specific biological assessment required for all projects involving ground disturbance.

In response to concerns about project placement near riparian zones and stream habitat, pursuant to Mitigation Measure BIO-15 in the Draft EIR, areas identified by the project-specific biological assessment (Mitigation Measure BIO-1) as containing potentially jurisdictional features must contract a qualified biologist to complete a jurisdictional delineation. This delineation would determine the extent of jurisdiction for CDFW, USACE, and/or RWQCB, and result in avoidance of these areas to the maximum extent possible. Due to the programmatic nature of the project, a precise, project-level analysis of all specific impacts associated with individual projects on potentially jurisdiction features is not possible at this time, and the site-specific analysis is required to verify features present. Additionally, under Mitigation Measure BIO-15, if after reviewing the site-specific delineation report a permitting agency asserts its jurisdictional authority, then the project proponent would be required to seek regulatory permitting and implement the measures set forth by the agency asserting jurisdiction during the permitting process. Further, Mitigation Measure BIO-16 requires that projects are designed to avoid potential jurisdictional features and that all construction activities be buffered from these features by at least 50 feet. Therefore, jurisdictional features and associated habitats would be identified on a site-specific basis as required under the Draft EIR. As such, no revisions to the Draft EIR are required in response to this comment.

Response O-1.4

The commenter opines that Rezoning Sites SAN-9 and SAN-10 are in areas that support California tiger salamander (CTS) and further that these areas contain wetlands and vernal pools that have not been delineated. The commenter recommends that this be addressed in the Draft EIR.

Mitigation Measure BIO-5 included in the Draft EIR requires that for projects containing potentially suitable habitat present for state- and/or federally-listed species, including CTS, surveys conducted in accordance with relevant protocols be completed in accordance with agency standards. Additionally, the commenter is asked to please refer to Response X.9 below for the fully revised text of Mitigation Measure BIO-5 to include specific protocols to survey for CTS within the Santa Rosa Plain as requested by CDFW. Therefore, impacts to CTS and their habitats would be appropriately mitigated for under the Draft EIR, and surveys beyond the protocol level surveys required by Mitigation Measure BIO-5 (refer to Response A-1.9 for revisions to this measure) are not warranted. As such, no revisions to the Draft EIR are required in response to this comment.

Response O-1.3

The commenter states that Rezoning Site GRA-2 identified in the Draft EIR is in riparian habitat adjacent to Atascadero Creek. The commenter opines that there are likely several special-status plant species that occur at this Rezoning Site. The commenter states an opinion that there is a potential for the range of Pitkin marsh lily to expand to this Rezoning Site under climate change conditions. The commenter opines that the largest threat to the survival of this species is loss and habitat disturbance resulting from residential development. The commenter expresses concern that development along Atascadero Creek may remove habitat that the lily could move into. The commenter further references indirect effects to habitat that rural residences, driveways, and agricultural operations may have including increased runoff, nutrient loading, erosion, sedimentation, and changes in soil pH. The commenter recommends that these items are addressed in the Draft EIR.

As described above, Mitigation Measure BIO-1 requires a site-specific biological resources screening and assessment to evaluate potential habitat including sensitive habitats such as riparian areas prior to project approval. This initial assessment would identify potential habitat for special-status species such as the Pitkin marsh lily and other special-status plants. Pursuant to Mitigation Measure BIO-2, if the

project specific biological assessment determines there is potential for impacts to special-status plant species due to project development, a qualified biologist shall complete surveys for special status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). Following this assessment, if special-status plants are found and would be directly impacted, implementation of Mitigation Measure BIO-3 would require projects to be re-designed to avoid impacts to these plant species and their surrounding habitats. Therefore, sensitive communities, special-status plant species, and associated habitats would be identified on a site-specific basis and avoidance of these species would occur as required by the Draft EIR. As such, no revisions to the Draft EIR are required in response to this comment.

In response to the comment regarding indirect effects from development including runoff, nutrient loading, erosion, sedimentation, and changes in soil pH, Mitigation Measure BIO-6 requires best management practices for sedimentation and erosion control as well as buffers from riparian habitat and/or water bodies, which would reduce and/or avoid impacts to these habitats. Additionally, Section 4.10, *Hydrology and Water Quality*, contains information regarding best management practices to control runoff, as well as Sonoma County Code governing water quality discharges from project sites. As such, no revisions to the Draft EIR are required in response to this comment.

Response O-1.5

The commenter states that Rezoning Site AGU-2 is in Sonoma Creek. The commenter acknowledges that housing already exists within the associated riparian zone but states an opinion that it would be inappropriate to put more development along the creek and that this may compromise the Sonoma Creek flood plain. The commenter recommends that this be addressed in the Draft EIR.

The commenter is asked to please refer above to Response O-1.2 regarding concerns about project placement near riparian zones and stream habitat. With implementation of Mitigation Measure BIO-15 and BIO-16 impacts to stream habitat and riparian zones would be evaluated and mitigated for on a site-specific basis. As such, no revisions to the Draft EIR are required in response to this comment.

EIR Organization Comment O-2

COMMENTER: Lucy Hardcastle, President, Forestville Planning Association Board of Directors

DATE: February 12, 2023

Response O-2.1

The commenter introduces themselves and expresses concerns regarding additional population in Forestville in regards traffic congestion. The commenter states their understanding of RHNA, and requests recognition on their perspectives.

This comment is noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response O-2.2

The commenter expresses concern regarding lack of road infrastructure and emergency evacuation. The commenter also expresses concern regarding future parking and traffic in Forestville.

This comment is noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure and Master Response EMG for additional information regarding emergency evacuation. Please refer to Section 4.16, *Transportation*, of the Draft EIR for a full analysis of potential transportation impacts induced by the proposed project. Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

Response O-2.3

The commenter states that Rezoning Site FOR-1 is acceptable, but that the site has a contamination issue. The commenter states traffic will be a concern due to a nearby school.

This comment is noted. Please refer to Section 4.9, *Hazards and Hazardous Materials,* of the Draft EIR for a detailed analysis pertaining to potential hazards and proposed mitigation measures. The EIR identifies FOR-1 as containing the Electro Vector site in Table 4.9-2 of the EIR. Refer to Impact HAZ-2 regarding investigation, remediation, and cleanup before development. As discussed therein, compliance with all applicable regulations relating to site remediation would minimize impacts to development at Rezoning Site FOR-1 to a less than significant level.

Regarding the existing school and potential traffic, please refer Master Response EXST and Section 4.16, *Transportation,* of the Draft EIR for a full analysis of potential impacts to transportation.

Response O-2.4

The commenter expresses opposition to Rezoning Site FOR-2. The commenter states the roadways surrounding this site are inadequate to support future development.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element and Master Response EXST regarding the existing conditions of services and infrastructure.

Response O-2.5

The commenter states there is other affordable housing located near Rezoning Sites FOR-3, FOR-5, and FOR-6. The commenter states that they approve of the existing density at those sites. The commenter states that these sites would be appropriate for a skatepark.

This comment is noted. Please refer to Master Response SITE and Master Response HE for additional detail on the Rezoning Site selection process and conditions of the proposed project. As stated in Master Response HE, a site on the list of Rezoning sites does not guarantee that the site will or will not be rezoned, as that decision is up to the decision-makers.

Response O-2.6

The commenter expresses opposition to Rezoning Site FOR-4 stating that the site would introduce health and safety concerns about evacuation.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites, and Master Response EMG regarding emergency evacuation.

Response O-2.7

The commenter expresses concerns regarding traffic near Rezoning Site FOR-7.

This comment is noted. Please note that Site FOR-7 is not a Rezoning Site.

Please refer to Section 4.16, *Transportation,* of the Draft EIR for a full analysis of potential impacts to transportation. However, please refer to Master Response TRA regarding traffic congestion. please note that on September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law. SB However, Appendix TRA of the Draft EIR includes an LOS-based congestion analysis for informational purposes. As shown in Appendix TRA of the Draft EIR, traffic volumes in Forestville were calculated for the Front Street (Hwy 116)/Mirabel Road intersection. As shown in the informational analysis provided in Appendix TRA, full buildout of the Forestville and Guerneville Rezoning Site could degrade roadway level of service (LOS) operations to LOS E, and the intersection also meets the peak hour signal warrant for signalization. The improvement measure provided for informational purposes is program-related development to fund the construction of a traffic signal or roundabout at the intersection, either of which would result in the intersection operating at LOS B conditions in both the AM and PM peak hours.

Response O-2.8

The commenter summarizes upcoming public participation and states they are grateful for the opportunity to bring. the community together.

This comment is noted. The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

EIR Organization Comment O-3

COMMENTER: Gary Harris, Forestville Chamber of Commerce

DATE: February 13, 2023

Response O-3.1

The commenter introduces themselves and the Forestville Chamber of Commerce.

The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

Response O-3.2

The commenter asks how growth in Forestville will be mitigated, with specific questions regarding FOR-2, which would require being annexed to the sewer district and connection to a sewer line. The commenter states they have seen sewage spill out of a manhole cover.

This comment has been noted. Please refer to Master Response UTIL regarding concerns about the existing sewer system.

Response O-3.3

The commenter is concerned about flooding and drainage issues, and is worried development of FOR-2 will exacerbate that problem.

Please refer to Section 4.10, *Hydrology and Water Quality,* of the Draft EIR for detail pertaining to impacts of flooding induced by the proposed project. As stated in Impact HWQ-3 on page 4.10-26, the proposed project would alter drainage patterns and increase runoff at the Rezoning Sites, but would not result in increased flooding on or offsite, or exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts regarding flooding would be less than significant.

Response O-3.4

The commenter expresses concerns with traffic including that the existing downtown crosswalks appear inadequate and unsafe and increased traffic may exacerbate this problem. The commenter asks how this would be mitigated.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response O-3.5

The commenter opines a different property downtown would be more suitable for high-density housing.

This comment has been noted. Please refer to Master Response SITE.

Response O-3.6

The commenter expresses approval of site FOR-1 but expresses concerns regarding existing contamination and whether its owners will sell the property.

This comment is noted. Please refer to Section 4.9, *Hazards and Hazardous Materials,* of the Draft EIR for a detailed analysis pertaining to potential hazards and proposed mitigation measures. The EIR

identifies FOR-1 as containing the Electro Vector site in Table 4.9-2 of the EIR. Refer to Impact HAZ-2 regarding investigation, remediation, and cleanup before development. As discussed therein, compliance with all applicable regulations relating to site remediation would minimize impacts to development at Rezoning Site FOR-1 to a less than significant level.

Response O-3.7

The commenter states there are few job opportunities in the area, which would require new residents to commute, which would result in more traffic and the need for improved roads, traffic lights, and crosswalks. The commenter asks how that will be mitigated.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Response O-2.7, above, for information regarding impacts to traffic and transportation for the Rezoning Sites located in Forestville.

Response O-3.8

The commenter attaches a letter written six years ago and opines on the nature of the Housing Element process and states they do not feel represented and should have been consulted more.

The comment does not pertain to the adequacy of the Draft EIR, and no response is required. The attached comment letter does not refer to and is not about the Housing Element Update or EIR. Refer to Master Response HE regarding dissatisfaction with the Housing Element process.

EIR Public Comment 1

COMMENTER: Rebecca Mateja

DATE: December 28, 2022

Response 1.1

The commenter expresses concern regarding the current availability of water resources and asks why more homes will be built when existing water sources are inadequate.

This comment is noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Refer to Section 4.10, *Hydrology and Water Quality*, and *Section 4.19*, Utilities and Service Systems, for impacts of the project relating to water.

EIR Public Comment 2

COMMENTER: Greg Tatarian

DATE: January 3, 2023

Response 2.1

The commenter states their qualifications as a bat specialist consultant. The commenter opines that sections 2 and 3 of Mitigation Measure BIO-7 included in the Draft EIR are not sufficient to prevent direct mortality of roosting bats and may result in loss of large numbers of bats potentially roosting in buildings, trees, or other features within Rezoning Sites. The commenter also opines that these measures may result in costly delays to project schedules if roosting bats are found to be present during the recommended seasonal period. Further, the commenter states that section 4 of Mitigation Measure BIO-7, requiring pre-construction surveys for roosting bats, may be misconstrued as effective for roosting bats.

This comment provides a summary of the commenters overall concerns and introduces the commenter's qualifications. The comment is noted and passed on to the County decision-makers. Please refer to Responses 2.2 through 2.4 below for details on the changes made to MM BIO-7 as it relates to bat avoidance and minimization measures.

Response 2.2

The commenter states that section 2 of Mitigation Measure BIO-7 assumes bats are active throughout the year, and opines that this is not true, making the surveys included in the measure ineffective. The commenter also states that only requiring surveys if a colony is present is insufficient and that section 2 of Mitigation Measure BIO-7 does not account for bat presence in buildings during maternity season and does not address all habitat types/features used by bats. The commenter goes on to list what they see as appropriate steps required in surveying where a project may impact bat roosting activity. To rectify these insufficiencies and provide appropriate mitigation for roosting bats, the commenter recommends altering Mitigation Measure BIO-7 such that surveys only occur when bats are active (from approximately April 1 through mid-October). The commenter also notes that if a maternity colony of special-status bat species is suspected, additional mitigation outside of preventing direct mortality is required. The commenter recommends that this would require more accurate surveys to identify bats species and quantify population size. The commenter notes that night emergence surveys are generally the most accurate method, and that conducted properly these surveys are also the least negatively impactful to the colony.

As MM BIO-7 is currently written in the Draft EIR, section 2 of the measure requires a qualified biologist to conduct a survey of existing buildings prior to construction to determine if bat species are present. The commenter is correct that this measure also only requires further surveys if a colony is observed in any structure. The commenter is also correct that as the measure is currently written, surveys would be required outside the maternity season (November through March). Revisions have been made to incorporate the commenter's recommendations into MM BIO-7 and to ensure that surveys are adequately conducted for special-status bat species. Changes to MM BIO-7 do not rise to the level of "new information" as defined in Section 15088.5 of the *CEQA Guidelines*, and thus recirculation of the Draft EIR is not required. Page 4.4-33 of the Final EIR has been revised with the following (changes shown in strikeout/underline):

BIO-7 Non-listed Special Status Animal Species Avoidance and Minimization

The project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) shall identify some or all the below measures that will be required and applicable to the individual project: […]

2. Prior to ~~construction, a qualified biologist shall conduct a survey of existing buildings to determine if bats are present~~ removal or alteration of trees and structures that may serve as roosting habitat for special-status bat species, a qualified biologist shall conduct a focused survey of all trees and structures to be removed or impacted by construction activities to determine whether active roosts of special-status bats are present on site. The survey shall be conducted ~~during the non-breeding season (November through March)~~ during seasonal periods of bat activity (April 1 through October 15). The biologist shall have access to all structures and interior attics, as needed. If a colony of bats is found roosting in any structure, tree or other habitat, further surveys, such as night emergent surveys, shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.). Tree or structure removal shall be planned for either the spring or the fall and timed to ensure both suitable conditions for the detection of bats and adequate time for tree and/or structure removal to occur during seasonal periods of bat activity exclusive of the breeding season, as described below. Trees and/or structures containing suitable potential bat roost habitat features shall be clearly marked or identified. If no bat roosts are found, the results of the survey will be documented and submitted to the County within 30 days of the survey, after which no further action will be required.

Response 2.3

The commenter states that section 3 of Mitigation Measure BIO-7 included in the Draft EIR does not account for the likely presence of maternity colonies in buildings during maternity season and does not address other habitat types and features used by bats. The commenter recommends that human eviction of bats as detailed in section 3 of Mitigation Measure BIO-7 would need to occur only during seasonal periods of bat activity; before winter torpor and before maternity season (from about March 1 to April 15), and after young are self-sufficiently flying to and from the natal roost and no longer relying on milk from their mothers (September 1 through about October 15). The commenter notes that these periods are conservative to protect all bat species in the region and account for a range of dates in birth, development, and volancy (ability to fly).

As Mitigation Measure BIO-7 is currently written in the Draft EIR, section 3 includes requirements for exclusion measures if roosting bats are present in a building during the daytime but are not part of an active maternity colony. This measure requires that maternal bat colonies are not disturbed. The commenter is correct that this measure does not address other habitat types or features where bats may roost. Revisions have been made to incorporate the commenter's recommendations into Mitigation Measure BIO-7 and to ensure that maternity colonies are appropriately avoided during maternity season and that other habitat features are addressed. Changes to Mitigation Measure BIO-7 do not rise to the level of "new information" as defined in Section 15088.5 of the *CEQA Guidelines*, and thus recirculation of the Draft EIR is not required. Page 4.4-34 of the Final EIR has been revised with the following (changes shown in strikeout/underline):

BIO-7 Non-listed Special Status Animal Species Avoidance and Minimization

The project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) shall identify some or all the below measures that will be required and applicable to the individual project: […]

3. ~~If bats are roosting in the building during the daytime but are not part of an active maternity colony, then exclusion measures must include one-way valves that allow bats to get out but are designed so that the bats may not re-enter the structure. Maternal bat colonies shall not be disturbed.~~ If day roosts are present, the biologist shall prepare a site-specific roosting bat protection plan to be implemented by the contractor following the City's approval. The plan shall incorporate the following guidance as appropriate:

   - When possible, removal of trees/structures identified as suitable roosting habitat shall be conducted during non-seasonal periods of bat activity, including the following:

     a. A Between September 1 and about October 15, or before evening temperatures fall below 45 degrees Fahrenheit and/or more than 0.5 inch of rainfall within 24 hours occurs.

     Between March 1 and April 15, or after evening temperatures rise above 45 degrees Fahrenheit and/or no more than 0.5 inch of rainfall within 24 hours occurs.

   - If a tree /structure must be removed during the maternity season and is identified as potentially containing a colonial maternity roost, then a qualified biologist shall conduct acoustic emergence surveys or implement other appropriate methods to further evaluate if the roost is an active maternity roost. Under the biologist's guidance, the contractor shall implement measures that consist of (or exceed) the following:

     a. Between September 1 and about October 15, or before evening temperatures fall below 45 degrees Fahrenheit and/or more than 0.5 inch of rainfall within 24 hours occurs.

     b. Between March 1 and April 15, or after evening temperatures rise above 45 degrees Fahrenheit and/or no more than 0.5 inch of rainfall within 24 hours occurs.

   - Tree removal procedures shall be implemented using a two-step tree removal process. This method is conducted over two consecutive days and works by creating noise and vibration by cutting non-habitat branches and limbs from habitat trees using chainsaws only (no excavators or other heavy machinery) on day one. The noise and vibration disturbance, together with the visible alteration of the tree, is very effective in causing bats that emerge nightly to feed to not return to the roost that night. The remainder of the tree is removed on day two.
   - Prior to the demolition of vacant structures within the project site, a qualified biologist shall conduct a focused habitat assessment of all structures to be demolished. The habitat assessment shall be conducted enough in advance to

ensure the commencement of building demolition can be scheduled during seasonal periods of bat activity (see above), if required. If no signs of day roosting activity are observed, no further actions will be required. If bats or signs of day roosting by bats are observed, a qualified biologist will prepare specific recommendations such as partial dismantling to cause bats to abandon the roost, or humane eviction, both to be conducted during seasonal periods of bat activity, if required.

Response 2.4

The commenter opines that pre-construction surveys for roosting bats should only be conducted as confirmation that all previous efforts to assess potential bat habitat and project-specific measures to prevent direct mortality have been effective. The commenter opines that if pre-construction surveys are conducted during winter months, the presence of roosting bats may go undetected, and mortality of bats may occur. Further, the commenter opines that if surveys are conducted during maternity season and bats not previously found are present, construction delays would occur. The commenter states that assessment of habitat for bats must be conducted by a qualified biologist early in the project, resulting in recommendations to be implemented during the appropriate seasonal periods. Finally, the commenter opines that it is inappropriate and in violation of laws and regulations to capture and relocate native wildlife species without permits issued by the California Department of Fish and Wildlife (CDFW). The commenter recommends that for these such actions, approval must be issued by CDFW.

Please refer Response 2.2 and 2.3 above for the fully revised text of Mitigation Measure BIO-7 to include specific survey requirements, avoidance measures, and tree/structure removal requirements. Implementation of this measure as revised above would assess habitat for bat species during the appropriate seasons and avoid impacts to special-status bat species if they are found to be present. Additionally, section 8 of the Mitigation Measure BIO-7 includes requirements to consult with CDFW if special-status bat species may be present and impacted by project activities. As such, no revisions to the Draft EIR are required in response to this comment.

EIR Public Comment 3

COMMENTER: Brian Bollman

DATE: January 11, 2023

Response 3.1

The commenter states that while the Housing Element Update may be to comply with state law, the Housing Element Update and Draft EIR should include several observations, presented in the comments below.

This comment is noted, and the commenter is correct that purpose of the document as described in Section 2.7, *Project Objectives*, includes complying with State housing law. Please refer to Master Response HE regarding opposition to the Housing Element, and the specific responses below.

Response 3.2

The commenter states that Sonoma County's population is in its sixth year of decline.

This comment does not pertain to the analysis presented in the Draft EIR. This comment has been noted.

Response 3.3

The commenter states that until recently, the United States and California experienced an increase in the size of housing units, resulting in much larger square footage per person.

This comment does not pertain to the analysis presented in the Draft EIR. This comment has been noted.

Response 3.4

The commenter states that the number of persons per unit has decreased steadily in the United States and has been decreasing in Sonoma County.

This comment does not pertain to the analysis presented in the Draft EIR. This comment has been noted.

Response 3.5

The commenter states that vacancy rates drop during periods of prosperity, and during times that the economy worsens, people move together in order to save money.

This comment does not pertain to the analysis presented in the Draft EIR. This comment has been noted.

Response 3.6

The commenter claims that a recent audit by the state found that the methodology used for calculating housing needs exaggerates actual housing needs.

Please refer to Master Response HE regarding opposition to the Housing Element. This comment does not pertain to the analysis presented in the Draft EIR. This comment has been noted.

Response 3.7

The commenter states that the Association of Bay Area Governments (ABAG) bases its housing allocation on regional needs, and that this is not a functional or realistic practice because the Regional Housing Needs Assessment (RHNA) process used by ABAG shifts the burden of building new housing to outlying communities, such as Sonoma County.

Please refer to Master Response SITE for information on Rezoning Site selection and Master Response HE regarding opposition to the Housing Element. The commenter's dissatisfaction with RHNA calculation methodology does not pertain to environmental analysis in the EIR, but has been noted.

Response 3.8

The commenter concludes that the Draft EIR does not address potentially catastrophic environmental consequences of the RHNA process.

This comment relates to the comments above regarding the commenter's concern with the RHNA calculation methodology. Please refer to Master Response HE regarding opposition to the Housing Element. Please refer to the Draft EIR for the analysis of potential impacts resulting from the proposed project. This comment has been noted.

EIR Public Comment 4

COMMENTER: Josette Brose-Eichar

DATE: January 11, 2023

Response 4.1

The commenter asks if the 1,904 permitted vacation rentals are included in the 10,769 vacant housing units recorded in Sonoma County. The commenter asks if they are, why, as vacation rentals are occupied by short term renters.

Please note that the number of permitted vacation rentals was sourced from County documents, and the total number of vacant housing units was sourced from the Department of Finance. According to the Department of Finance (2023) "vacancy rates are based on 2020 Census benchmark data, adjusted to incorporate the directional changes described by the latest available ACS data. Exact data on foreclosures or other housing market indicators are not reliably available to adjust vacancy rates and are not used." Additionally, the commenter is citing the environmental setting in Section 4.14, *Population and Housing*, which provides context for the analysis. The analysis under Impact PH-1 and Impact PH-2 do not rely specifically on the vacancy rate for their analysis and conclusions.

Response 4.2

The commenter refers to a comment they left previously, where they state that the census data used is inaccurate and suggests that the County undertake a survey to determine the most accurate number of vacant units.

This comment has been noted and passed onto decision-makers.

Response 4.3

The commenter includes a list of census definitions for the terms "For occasional use," "Units Occupied by Person with Usual Residence Elsewhere," "Other vacant," and "Seasonal Vacant Units."

This comment does not pertain to the proposed project. This comment has been noted.

Response 4.4

The commenter asks why the real percentage of vacant units has not been shared. The commenter states that they find it hard to believe that there are as many vacant units as shown in the Draft EIR. The commenter states that census data may not be the most accurate source of information on vacant housing.

Please refer to Response 4.1. This comment has been noted and passed onto decision-makers.

EIR Public Comment 5

COMMENTER: Jim Bell

DATE: January 14, 2023

Response 5.1

The commenter expresses concerns regarding existing issues such as, but not limited to, traffic and road upkeep, water supply, power, sanitation, wildfire, schools, aesthetics, hazardous waste, law enforcement, fire protection, and homelessness. The commenter states that many of the existing issues have not been abated and asks how the County expects to abate future issues.

Please refer to Master Responses EXST, UTIL, FIRE, and EMG for information regarding existing conditions of services and infrastructure, impacts to the sanitation system, wildfire concerns, and emergency evacuation.

For additional information on each of the issue areas listed by the commenter, please refer to the Draft EIR. Information regarding aesthetics may be found in Section 4.1, *Aesthetics,* of the Draft EIR. Information regarding power may be found in Section 4.6, *Energy*, of the Draft EIR. Information regarding hazardous waste may be found in section 4.9, *Hazards and Hazardous Materials,* of the Draft EIR. Information regarding schools, law enforcement, and fire protection may be found in Section 4.15, *Public Services and Recreation*, of the Draft EIR. Information regarding transportation impacts may be found in Section 4.16, *Transportation,* of the Draft EIR. Information regarding impacts to water supply and waste management may be found in Section 4.18, *Utilities and Service Systems*, of the Draft EIR. Information regarding wildfire may be found in Section 4.19, *Wildfire*, of the Draft EIR. Homelessness is not a CEQA-required topic.

EIR Public Comment 6

COMMENTER: Matt O'Donnell

DATE: January 26, 2023

Response 6.1

The commenter states that they incorrectly identified a site address in their original letter and corrects the address to 3280 Hicks Road. The commenter expresses opposition to the proposed rezoning of 3280 Hicks Road. The commenter expresses concern regarding impacts to the rural nature of the area, and strain additional development will put on water supply.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure and Master Response HE regarding opposition to the Housing Element. This comment has been noted.

Response 6.2

The commenter expresses concerns regarding road width, pedestrian safety, high vehicle speeds, inadequate sidewalks and pedestrian facilities, and increased traffic near the Rezoning Site.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure. This comment has been noted.

Response 6.3

The commenter states that since there is no street parking and no walkable commercial stores, future residents may be car-dependent. The commenter expresses concerns regarding the addition of impervious surfaces used to create additional parking at the site.

Please refer to Master Response EXST.

As stated in Section 4.16, *Transportation,* the design of development facilitated by the proposed project on any of the Rezoning Sites is not known at this time. Each development project would be reviewed by the County and required to be consistent with appropriate regulations and design standards set forth by applicable plans, programs, and policies. This would include compliance with regulations pertaining to parking associated with the development of a site.

Response 6.4

The commenter states that the site is located at the top of a hill and expresses concern stating that additional cemented or impervious surfaces may increase runoff, potentially flooding existing resident backyards along Jannette Avenue.

Please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR. As stated therein, development facilitated by the project would alter the existing drainage patterns in the Rezoning Sites through introduction of new impervious surfaces and infrastructure. However, the Sonoma County General Plan includes goals and policies that are intended to reduce flood hazards through minimal alterations to designated floodplains, which would reduce the potential for increased susceptibility to flooding on or offsite. The Sonoma County Zoning Code implements this General Plan goal and policies through Sonoma County Code Chapter 7B, Flood Damage Prevention, which regulates grading and

building in FEMA-designated areas of special flood hazard (including floodways and floodplains), and by the F1 and F2 combining districts under the Zoning Code (Chapter 26) , which provide land use regulation for properties in floodways and provide for protection from hazards and damage that may result from flood waters in floodplain areas.

Implementation of these goals, policies, and ordinances would ensure that the runoff from development facilitated by the project on Rezoning Sites does not exceed the capacity of existing and future storm drain systems. The project would not alter the existing drainage patterns or contribute runoff water in a manner which would result in substantial erosion, siltation, or flooding, nor would it exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

Response 6.5

The commenter states that development of the site would create additional light pollution, and construction noise at the project site would be disruptive to the peaceful nature of the area.

Please refer to Section 4.1*, Aesthetics,* of the Draft EIR. As stated therein, Mitigation Measure AES-2 would be implemented in order to reduce potential impacts of light and glare. Mitigation Measure AES-2 includes, but is not limited to, requiring low-mounted and downward casted lighting, restrictions on lighting at the periphery of sites, prohibition of flood lights, and requirement that all lighting plans shall be designated to meet the appropriate Lighting Zone standards from Title 24 or successor regulations. Section 4.13, *Noise*, of the EIR analyzes noise levels. Impact NOI-1 discusses that construction noise would be subject to Mitigation NOI-1 through NOI-6, and that impacts would be less than significant with mitigation.

Response 6.6

The commenter expresses concern regarding the Graton Fire Station on Hicks Road. The commenter states that the Graton Fire Station has increased traffic in the area and thus increased noise from sirens. In addition, the commenter states that the County may be adding sewer access for trucks to bring wastewater from Occidental to the end of Hicks Road.

This comment does not pertain to the proposed project, but rather to existing conditions. Refer to Master Response EXST.

Response 6.7

The commenter expresses concern that an increase in the local population due to future development will make evacuation during an emergency difficult.

Please refer to Master Response EMG for information regarding emergency evacuations. This comment has been noted.

Response 6.8

The commenter states that the site is currently zoned for eight additional accessory dwelling units (ADUs). The commenter states that there are more preferable areas for development in Sebastopol.

Refer to Master Response SITE and Master Response HE. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements.

Response 6.9

The commenter includes their original letter with the incorrect address.

This comment has been noted and the correct address has been noted above in Response 6.1.

EIR Public Comment 7

COMMENTER: Rick Maifeld

DATE: January 27, 2023

Response 7.1

The commenter expresses concern regarding the impacts of Rezoning Sites in Forestville. The commenter expresses concern regarding strain on law enforcement, garbage collection, water, and traffic. The commenter asks how property values of existing residents will be impacted by the project.

Please refer to Master Response SITE for information on the Rezoning Site selection process and Master Response HE regarding opposition to the Housing Element. Please refer to Master Response TRA regarding traffic congestion.

For additional information on each of the issue areas listed by the commenter, please refer to the Draft EIR. Information regarding impacts to law enforcement may be found in Section 4.15, *Public Services and Recreation*, of the Draft EIR. Information regarding transportation impacts may be found in Section 4.16, *Transportation,* of the Draft EIR. Information regarding impacts to water supply and waste management may be found in Section 4.18, *Utilities and Service Systems*, of the Draft EIR.

EIR Public Comment 8

COMMENTER: Stacie Gradney

DATE: January 27, 2023

Response 8.1

The commenter asks why Sebastopol is not on the list of rezoned areas and whether areas further east were considered. The commenter expresses opposition to Rezoning Sites in Forestville stating that development will ruin the area, overcrowd classrooms, and attract crime.

Please refer to Master Response SITE for information on the Rezoning Site selection process and Master Response HE regarding opposition to the Housing Element. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, Sebastopol and Windsor, have their own ABAG-assigned RHNA and housing elements. For additional information regarding impacts to schools and law enforcement, please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR.

EIR Public Comment 9

COMMENTER: Colin Baptie

DATE: January 28, 2023

Response 9.1

The commenter opines that Table 4.5-5 on page 4.4-21 of the Draft EIR is inaccurate because it does not include federally designated critical habitat for northern spotted owl that the commenter claims is located within five miles of the Guerneville BSA. The commenter further states that a pair of nesting northern spotted owls were observed in August 2020 less than three miles from the Guerneville BSA as part of a survey for the Silver Estates Timber Harvest Plan. The commenter expresses concern at this omission.

As described in Appendix BIO of the Draft EIR, designated northern spotted owl critical habitat unit 11: Interior California Coast, subunit ICC-6 is in the Mayacamas Mountain Range located approximately 3.42 miles east of the Agua Caliente BSA and 4.01 miles northeast of the Sonoma BSA. This critical habitat is located approximately 21 miles east of the Guerneville BSA as shown by the U.S. Fish and Wildlife Service's *Critical Habitat Portal*. The commenter is asked to please refer to Response A-1.9 for a full description of the endangered/threatened species habitat assessments, protocol surveys, and avoidance required for projects where state- and/or federally- listed species have potential to occur. No revisions to the Draft EIR are required in response to this comment.

Response 9.2

The commenter poses a question asking why six housing sites are listed in Guerneville, while only four of these sites are included in the Guerneville BSA.

Table 2-2 of the Draft EIR describes the entire housing inventory site information which includes all 79 sites identified for the 6th cycle Housing Element to satisfy the RHNA allocation. Of these 79 sites, there are 59 Rezoning Sites that are viable for rezoning to accommodate new housing. The remaining 20 sites on the inventory are already zoned for residential units at an adequate density to meet the County's RHNA goals and do not require rezoning. GUE-5 and GUE-6 listed on Table 2-2 are not planned for rezoning under the Housing Element Update, and therefore were not included in the BSA for biological resources analysis as no changes to zoning are planned. Table 2-3 of the Draft EIR shows all Rezoning Sites and their proposed land use designations and zoning districts under the Housing Element Update. As such, no revisions to the Draft EIR are required in response to this comment.

EIR Public Comment 10

COMMENTER: Elissa Rubin-Mahon

DATE: January 28, 2023

Response 10.1

The commenter expresses opposition to the increase in potential housing in Forestville. The commenter states that Forestville is unincorporated and lacks adequate services to support the influx of new residents.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure and Master Response HE regarding opposition to the Housing Element. This comment has been noted.

EIR Public Comment 11

COMMENTER: Becky Boyle

DATE: January 30, 2023

Response 11.1

The commenter points to page 4.15-11 of the Draft EIR and states that Forestville is taking on a burden of the state's housing quota in comparison to other unincorporated areas in Sonoma County. The commenter states that a 25 percent increase in population is too much for Forestville and the area does not have the infrastructure to support that growth.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure, and Master Response SITE for information on the Rezoning Site selection process. This comment has been noted.

The commenter uses a quote from the EIR of "could be dominant" to refer to the population increase, but that language was used in regards to the visual assessment in Section 4.1, *Aesthetics*, not with regard to the population increase itself.

Response 11.2

The commenter states that the Draft EIR is incorrect on page 4.1-18 of the Draft EIR. The commenter asserts that there is no school located across from site FOR-2 on Mirabel Road.

The commenter is correct. Page 4.1-18 of the Draft EIR is revised as follows:

On Mirabel Road, the Forestville Youth Park ~~a school~~ is directly across the street from FOR-2.

This change to the existing setting description does not affect the aesthetics analysis that follows.

Response 11.3

The commenter states that the roads around Rezoning Site FOR-2 are not adequate to support an increase in population. The commenter states that the roads are small and have existing safety hazards, and that increasing the population would pose a risk to bicyclists and pedestrians in the area. The commenter claims there is no mention that the roads in Forestville are small country roads.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure. The EIR acknowledges that access roads in the vicinity of FOR-2 may be narrow on page 4.19-26 of the EIR. Impacts relating to bicycle and pedestrian safety are discussed in Section 4.16, *Transportation*, of the EIR, under Impact TRA-1. As stated therein, no significant impacts would occur.

Response 11.4

The commenter states that the Draft EIR does not include a discussion on displacement, loss of character, threat to local businesses, community conflicts, pollution-related health conditions, parking, and sanitation needs.

Please refer to pages 4.14-9 and 4.14-10 of Section 4.10, *Population and Housing,* of the Draft EIR for information regarding displacement. As discussed therein, some of the Rezoning Sites contain existing housing or other structures that could be removed during project implementation. However, the proposed project would enable development in the Unincorporated County that could result in a net

increase of 3,312 residential units on the Rezoning Sites. One of the fundamental goals of the project is to provide more housing development opportunities throughout the County and meet countywide housing inventory requirements. Thus, Mitigation Measure PH-1 requires that replacement housing be made temporarily available for any displaced existing residents prior to the demolition of existing housing on any of the Rezoning Sites.

Threats to local businesses, community conflicts, and parking are not required topics under CEQA.

The commenter does not specify the type of health impacts they are referring to. For information regarding impacts to air quality, please refer to Section 4.3, *Air Quality,* of the Draft EIR. For information regarding impacts to hazards please refer to Section 4.9, *Hazards and Hazardous Materials,* of the Draft EIR. For information regarding impacts to noise, please refer to Section 4.13, *Noise,* of the Draft EIR.

Refer to Section 4.1, Aesthetics, regarding visual character.

In regards to sanitation needs, please refer to Master Response UTIL.

Response 11.5

The commenter asks where there is a discussion on how the County plans to widen roads, add left turn lanes, round-a-bouts, and crosswalks for pedestrian safety. The commenter asks where a road safety study may be found.

Please refer to Section 4.16, *Transportation*, of the EIR for information regarding traffic safety. Currently, no road widening, addition of turn lanes, roundabouts, or crosswalks is proposed. Need for infrastructure improvements would be ascertained on a project-by-project basis when individual developments are proposed.

Response 11.6

The commenter states that there is no inclusion of feasible mitigation measures in the Draft EIR addressing the aesthetic impacts of Rezoning Sites FOR-1, FOR-3, and FOR-5. The commenter states that these sites would have significant and unavoidable impacts.

The commenter is correct in their assertion that aesthetic impacts to Rezoning Sites FOR-1, FOR-3, and FOR-5 would be significant and unavoidable.

As discussed in Section 5 of the Draft EIR, *Other CEQA,* CEQA requires decision-makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. The analysis contained in this EIR concludes that the proposed project would result in significant and unavoidable aesthetic impacts. Although development facilitated by the project on Rezoning Sites would be required to implement mitigation measures, impacts would remain significant and unavoidable because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines.

Response 11.7

The commenter notes that Tables 4.9-1 and 4.9-2 in the Draft EIR show that Rezoning Sites FOR-1, FOR-5, and FOR-6 are listed as being on "Existing Hazardous Material Contamination." The commenter states that the Draft EIR does not include a study describing the potential health risks to future residents, students near the Rezoning Sites, and impacts to the surrounding community. The commenter states that they do not see a study on how these hazardous materials may impact water resources near the Rezoning Sites.

Table 4.9-1 of the EIR shows Rezoning Sites near schools, not those specifically with contamination, which are listed in Table 4.9-2. The commenter is correct that FOR-1, FOR-5, and FOR-6 are included on this table.

As determined in Section 4.9 of the Draft EIR, *Hazards and Hazardous Materials,* development within 0.25 mile of the sites identified in Table 4.9-2 would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board, the Sonoma County Local Oversight Program, or DTSC, before construction activities could begin. The agency responsible for oversight would determine the types of remediation and cleanup required, and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells onsite with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants. Development facilitated by the proposed project on Rezoning Sites would be required to be in compliance with applicable regulations such as the California Health and Safety Code in order to reduce potential impacts to existing and future residents to a less than significant level.

Refer to Impact HWQ-3 in Section 4.10, *Hydrology and Water Quality*, regarding analysis of the potential for polluted runoff. This impact was found to be less than significant due to implementation of goals and policies in the County General Plan and adherence to Sonoma County Code regarding implementation of BMPs to control runoff.

Response 11.8

The commenter states that in Section 4.15.1a: Fire Protection, EMT response times are shown as prior to when departments were combined. The commenter states that they do not see a study regarding ratio of emergency calls per capita.

As noted under Table 4.15-1 in Section 4.15, *Public Services and Recreation*, the Russian River FPD, Rincon Valley FPD, and Forestville FPD were recently consolidated with the Bennett Valley, Bodega Bay, Mountain Volunteer, and Windsor FPDs as the new Sonoma County Fire District; and the Valley of the Moon FPD and Glen Ellen FPD were recently consolidated with the Mayacamas FPD as the new Sonoma Valley FD. The purpose of the consolidations was to address service level deficiencies that existed in the smaller respective agencies.

CEQA guidelines require an analysis of service ratios and response times, which are analyzed under Impact PS-1 of Section 4.15. The ratio of emergency calls per capita is not required to be analyzed under CEQA.

Response 11.9

The commenter quotes from the EIR and asks if, considering there would be a significant and unavoidable impact regarding greenhouse gas emissions, it would make more sense to build development in a less car dependent area. The commenter asks if it would be advisable, particularly for low-income residents, for future development to be centered near urbanized areas with additional services.

Please refer to Master Response SITE regarding information on the Rezoning Site selection process. This comment has been noted and passed onto decision-makers.

Response 11.10

The commenter states that Forestville does not have enough existing commercial services to support future population growth.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure. This comment has been noted.

Response 11.11

The commenter expresses understanding of State housing requirements and why the County must comply. The commenter states that Forestville is being pushed beyond what the area can realistically support.

Please refer to Master Response HE regarding opposition to the Housing Element. This comment has been noted.

Response 11.12

The commenter urges that the County choose the alternative where all six parcels in Forestville are not rezoned. The commenter asks that the same consideration be given for any sites with hazardous histories.

Please refer to Master Response SITE for information on Rezoning Site selection and Master Response HE regarding opposition to the Housing Element. This comment has been noted and passed onto decision-makers.

Response 11.13

The commenter asks that the County avoid considering sites FOR-1, FOR-2, FOR-3, FOR-4, FOR-5, and FOR-6 at minimum. The commenter asks that the County find other sites where future residents will have adequate commercial services, better roads, and the least amount of impacts to the environment.

Please refer to Master Response EXST regarding existing conditions of services, Master Response SITE for information on Rezoning Site selection, and Master Response HE regarding opposition to the Housing Element. This comment has been noted and passed onto decision-makers.

EIR Public Comment 12

COMMENTER: Jim Severdia

DATE: January 30, 2023

Response 12.1

The commenter states that prior to the release of the Draft EIR, they were not given notice of the potential rezoning in Sonoma County. The commenter expresses concern particularly for site SAN-10 and the lack of notice they were given.

Please refer to Master Response HE regarding opposition to the Housing Element. This comment has been noted. The commenter's concern regarding noticing has been forwarded to County staff.

Response 12.2

The commenter objects to the inclusion of site SAN-10. The commenter states that rezoning of the site would negatively impact the enjoyment of their property. The commenter suggests that APN 044-141-045 or APN 044-141-005 should be considered instead of site SAN-10.

Please refer to Master Response HE regarding opposition to the Housing Element and master Response SITE for information on Rezoning Site selection. This comment has been noted.

Response 12.3

The commenter states that the Draft EIR is incorrect in stating that there is public sewer and water service available in the area. The commenter notes that the nearest sewer line to SAN-10 is approximately 2,000 feet away. The commenter states that APN 044-141-045 has sewer mains much closer and should be considered.

The EIR correctly identifies that SAN-10 is not directly adjacent to existing wastewater collection systems on page 4.18-2 of the EIR, and for that reason, includes it on the list of sites required to implement Mitigation Measure UTIL-1. Please refer to Master Response SITE regarding Rezoning Site selection and Master Response UTIL regarding sewer system infrastructure. This comment has been noted.

Response 12.4

The commenter suggests that SAN-10 should not be included and instead it should be passed over so that consideration to the last extension of the Community Separator in the area may be provided. The commenter suggests that the RR3 zoning designation of the eastern portion of the parcel should remain in place so it may function to keep the separator in place. The commenter states the Community Separator between the Santa Rosa Avenue commercial corridor, and the Mountain View Avenue rural residential area will have much more continuity, be much more complete, and will follow logically.

This comment has been noted and passed onto decision-makers.

Response 12.5

The commenter notes that SAN-10 is one of the few parcels in the area with split zoning that should be maintained. The commenter states that the issue pertaining to the split zoning should be resolved before site SAN-10 is considered in the Housing Element Update.

This comment has been noted and passed onto decision-makers.

Response 12.6

The commenter states that they have additional objections to the substance of the Draft EIR and inventory, noted in the following comments. The commenter states that they have only cursorily looked over the Draft EIR. The commenter asks at what level of error causes lack of trust in the work presented in the Draft EIR.

Please refer to Master Response HE regarding opposition to the Housing Element, and responses to specific comments in Letter 12. Please refer to Section 5, *Revisions to the Draft EIR*, which lists revisions made to the document. This comment has been noted.

Response 12.7

The commenter states that Figure 4.1-36 is incorrect and that what is shown in that figure is the eastward view, the same as Figure 4.1-35.

The commenter is correct. Page 4.1-34 of the EIR has been revised as follows:

Figure 4.1-1 SAN-10 Viewed from the Southern Boundary, Looking East~~West~~

Response 12.8

The commenter states that the APNs presented in Table 2-2 for sites SAN-10, SAN-13, SAN-14, and SAN-16 do not match the APNs located in the Sonoma County Parcel Viewer.

The APN for site SAN-10 in the EIR is correct. The following revisions to the addresses for sites SAN-13, SAN-14, and SAN-16 were made on page 2.7 of the EIR: The following revisions to the addresses for sites SAN-13, SAN-14, and SAN-16 were made on page 2.7 of the EIR:

Site ID	Site Address	Assessor's Parcel Number	Nearest Community	Corresponding Figure No.	Rezone Site?
SAN-13	~~3847 Santa Rosa Avenue~~ 3855 Santa Rosa Avenue	134-181-046	Santa Rosa	2-7	No
SAN-14	~~3847 Santa Rosa Avenue~~ 3845 Santa Rosa Avenue	134-181-047	Santa Rosa	2-7	No
SAN-16	~~3445 Brooks Avenue~~ 3452 Brooks Avenue	134-132-067	Santa Rosa	2-7	No

Response 12.9

The commenter states that Table ES-1 and Table 4.1-6 reference Mitigation Measure AES-5; however, under Project Impacts and Mitigation Measures in Section 4.1, Aesthetics, does not contain a Mitigation Measure AES-5.

Table ES-1 in the Executive Summary of the EIR only contains Mitigation Measures AES-1 and AES-2. However, the commenter is correct in stating that Mitigation Measure AES-5 was inadvertently included in Table 4.1-6, but not included in the analysis presented in section 4.1 of the Draft EIR. Corrections have been made to Table 4.1-6 in Section 4.1, *Aesthetics.* Those changes are also reflected in Section 5, *Changes to the EIR.* These changes don't warrant recirculation or change any impacts or findings of the EIR.

EIR Public Comment 13

COMMENTER: Kim Thatcher

DATE: January 30, 2023

Response 13.1

The commenter states that they do not understand why such an increase in housing in Forestville can be approved considering existing water supply inadequacies.

Please refer to Master Responses EXST regarding existing infrastructure Master Response and HE regarding opposition to the Housing Element. Impacts related to water are analyzed in Section 4.18, Utilities and Service Systems.

Response 13.2

The commenter asks how the residents of Forestville are expected to be a part of the decision making process when times chosen for meetings are during normal working hours. The commenter asks how their voice may be heard in the future.

This comment has been noted and passed onto County staff and decision-makers. Additionally, comments on the Draft EIR could be sent in via email or mail at any time during the 55-day public comment period.

EIR Public Comment 14

COMMENTER: Jonathan Teel

DATE: January 31, 2023

Response 14.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 14.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Construction-related traffic impacts are discussed on in Section 4.16, *Transportation*, of the EIR, on page 4.16-16. As stated in Section 4.19, *Wildfire*, of the EIR, "[p]rior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways could be required. Those improvements would require a County encroachment permit if on a public right-of-way" and Mitigation Measure TRA-2, which requires a construction traffic management plan, would be required, and with incorporation of mitigation would reduce impacts to a less than significant level.

Response 14.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Master Response UTIL regarding water and wastewater systems, and Master Response EXST regarding the current condition of the pump station. As stated in Section 4.18, *Utilities and Service Systems*, on page 4.18-15 of the Draft EIR, "several of the Rezoning Sites are not adjacent to existing water or wastewater infrastructure and require further evaluation at the project level during the plan review and permit approval phase. Mitigation Measure UTIL-1 is required to reduce impacts related to water supply and wastewater system sufficiency." This mitigation measure would ensure future development would be adequately served by providers, and would result in less than significant impacts on the Rezoning Sites, with the exception of GEY-1 through GEY-4.

Response 14.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sites are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

This comment is noted. Please refer to Master Response EXST. Table 4.19-2 of the EIR identifies the Guerneville sites as in a Moderate Fire Hazard Severity Zone (FHSZ) as indicated in the adopted 2007

CALFIRE FHSZ Viewer, but the Guerneville sites are now shown as in a High FHSZ in the more recent 2022 Draft CALFIRE FHSZ Viewer which has not yet been adopted.

A portion of GUE-3 and GUE-4 is within the FEMA-mapped floodway and an additional portion is within the FEMA-mapped 100-year floodplain, while GUE-2 is outside of FEMA-designated floodplains; refer to Figures 4.10-4 (as revised) and 4.10-5 of the EIR. As discussed under Impact HWQ-4 of Section 4.10, *Hydrology and Water Quality*, of the EIR, development in the 100-year floodplain would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. This includes the prohibition of fill in County-identified special flood hazard areas (refer to Section 7B-12 of the Sonoma County Code of Ordinances), and requiring review and approval of proposed drainage facilities by Permit Sonoma. Rezoning Sites that are within the Floodway Combining District (F1) or Floodplain Combining District (F2) would be required to comply with County requirements as stated in Articles 56 and 58, respectively, of the Sonoma County Code of Ordinances. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. Therefore, increased flooding on adjacent parcels to the Rezoning Sites would not occur because of the project. Impacts related to flood flows would be less than significant.

As acknowledged in Section 4.7, *Geology and Soils*, Sonoma County is subject to risks associated with potentially destructive earthquakes, and as stated on page 4.7-3 of the EIR, GUE-3 and GUE-4 contain soils with high or very high liquefaction levels. As addressed on page 4.7-26 of the EIR, compliance with mandatory California Building Code requirements, implementation of General Plan goals and policies, and compliance with applicable laws and regulations would reduce impacts related to liquefaction to a less-than-significant level.

Response 14.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Aesthetic impacts are analyzed in Section 4.1, *Aesthetics*, of the Draft EIR. As discussed on page 4.1-5 of the EIR, trees and woodlands are determined to be a distinctive part of the Sonoma County visual landscape and form an important visual resource where they occur. Table 4.1-3 in the EIR shows rezoning sites with Zoning and General Plan designations that protect visual resources, including rezoning sites GUE-2, GUE-3, and GUE-4 which are zoned as Valley Oak Habitat Combining District. Trees are discussed in the assessment of the visual quality of sites GUE-2, GUE-3, and GUE-4 on pages 4.1-11 and 4.1-12 of the EIR. Impact AES-3 also mentions that "[t]he project would facilitate development projects at some sites that could introduce incongruous styles and massing or could degrade visual character through the necessary removal of existing, mature trees. New development that is incompatible with the natural and built conditions as they exist could cause a significant impact to the visual quality by changing the visual nature of the site from open space to densely developed residential properties, or by introducing structures with unremarkable design into a neighborhood with a distinctive character informed, in part, by the architecture. This would result in significant impacts on 25 Rezoning Sites with high site sensitivity where development would be dominant or codominant, and sites with moderate sensitivity where development would be dominant, including GUE-4. Even with incorporation of Mitigation Measure AES-1 for screening vegetation, because development on the Rezoning Sites that are facilitated by the project cannot be made to comply with discretionary, subjective design guidelines, projects on these 25 sites, it may substantially degrade the existing visual character or quality of public views of the site and its surroundings. Thus, impacts would remain significant and unavoidable.

Response 14.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Consistency with the Sonoma County General Plan and Plan Bay Area 2050 are analyzed in Section 4.11, *Land Use and Planning*. As shown in Table 4.11-3, the project is consistent with the vast majority of relevant policies in the County General Plan, and a project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation.

As stated in Section 4.11 regarding Plan Bay Area 2050, "The proposed project would result in an increased availability of housing and affordable housing for all income levels in the Unincorporated County, following buildout of the Rezoning Sites. Additionally, the Rezoning Sites are located in Urban Service Areas near developed urban areas, which would result in the development of housing near existing community resources in a manner that promotes more inclusive communities. As such, the project would be consistent with the themes described above."

It is unclear what the commenter is referring to as "Housing Element policy," but the Housing Element undergoes review and certification by the California State Department of Housing and Community Development (HCD) to ensure it meets requirements.

Response 14.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element.

EIR Public Comment 15

COMMENTER: Janice Stenger

DATE: January 31, 2022

Response 15.1

The commenter asks that the County appoint a resource bureau where they may find data that is not publicly available. The commenter suggests that a meeting for the owners of the rezone sites should have been considered.

Information used to create the Draft EIR is publicly available. Please consult Section 7, *References,* of the EIR. Suggestions for an in-person meeting regarding rezoning have been noted and passed onto decision-makers, though may be infeasible due to the countywide scale of the project.

Response 15.2

The commenter suggests that representatives from RR Sanitation (Russian River County Sanitation District) and information on the existing bus system should have been included in public meetings. The commenter states that data on public transportation ridership, crime statistics, information on fires started by arsonists, and emergency ambulance rides in Guerneville is difficult to find.

Available information from Sonoma County Transit is included in Section 4.16.1 of the EIR. Additionally Russian River County Sanitation District was consulted and is included on Table 4.18-2 and analyzed throughout Section 4.18, *Utilities and Service Systems*, in the EIR. More information regarding the Russian River County Sanitation District can be found in Appendix WSS.

Response 15.3

The commenter states a link to the Draft EIR is not provided on the County website, and that the existing link leads to an error message. The commenter states that a print copy of the Draft EIR should have been kept in local libraries. The commenter asks if the County needs a planning department, as they disagree with the County delegating planning responsibilities to outside consultants.

The Draft EIR was and remains available on the County website at: https://permitsonoma.org/longrangeplans/proposedlong-rangeplans/housingelement/. Copies of the Draft EIR were available at the following public libraries:

- Petaluma Regional Library
- Guerneville Regional Library
- Healdsburg Regional Library
- Sonoma Valley Regional Library
- Roseland Regional Library
- Santa Rosa Central Library

Response 15.4

The commenter asks if they can be assured that the sewer district now follows federal government mandates. The commenter expresses concern regarding the number of sewer line hookups the sewer district has added. The commenter notes that sewer charges have increased for existing residents. The commenter expresses dissatisfaction with the existing sewer system infrastructure and summarizes historical issues with the system. The commenter states generally that the Draft EIR utilizes incorrect and out-of-date data.

Please refer to Master Response UTIL regarding sewer system infrastructure and Master Response EXST regarding existing conditions of the sewer system. This comment does not pertain to impacts of the proposed project. The commenter's assertion of errors in the EIR does not point to specific issues, but revisions to correct typographical and other errors are listed in Section 5, *Revisions to the EIR*.

Response 15.5

The commenter states that the increase in future residents will create a difference in the environment, and notes that there are rules, such as Fire Safety Ordinance 6184, that restrict building on dead-end roads and cul-de-sacs. The commenter states that the photo of Guerneville used in the Draft EIR is unflattering and expresses discontent that their parcel does not appear in the image.

Please refer to Section 4.19, *Wildfire*, of the Draft EIR for additional information regarding wildfire impacts relevant to the proposed project. As stated therein, any development facilitated by the proposed project on Rezoning Sites would be required to comply with all applicable local, State, and federal regulations regarding wildfire and wildfire safety.

In regard to the images used in the Draft EIR, Figure 4.1-5 shows GUE-2 and GUE-3 from Cutten Avenue.

Response 15.6

The commenter states that the FEMA flood map is dated and does not accurately reflect what flood patterns look like near site GUE-3. The commenter states that during floods, water can rise and stretch past Watson Road.

This comment is noted. Please refer to Master Response EXST regarding existing and historical issues regarding flood risk. This comment does not pertain to impacts caused by the proposed project. Additionally, the EIR uses the most updated flood information available from FEMA, which is from 2008, rather than the 1950s as asserted by the commenter.

Response 15.7

The commenter asks if PG&E's description of wildfire conditions or the County's description should be trusted. The commenter notes that their area is in a "High Hazard" area according to the Wildfire Risk Index. The commenter includes an image. The commenter adds that other maps show their area being at high risk of liquefaction.

Please refer to Figure 4.19-3 in Section 4.19, *Wildfire*, of the Draft EIR. As stated therein, the figure relies on the current Fire Hazard Severity Zones from CAL FIRE. CAL FIRE determines fire hazard severity based on factors including fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread. PG&E's community wildfire safety program relies on a Fire-Threat Map of California created by the California Public Utilities Commission to show places with a high risk of wildfires that could put people

and property in danger. The Wildfire Risk Index was developed for a non-regulatory program, the Community Wildfire Prevention Plan, and as noted on the website the Wildfire Risk Index has not yet been formally reviewed or adopted by the resource agencies, and is subject to change prior to codification. Therefore, the most appropriate resource to use for CEQA analysis regarding wildfire is CAL FIRE's Fire Hazard Severity Zone maps.

Regarding liquefaction, the commenter is correct that GUE-3 contains soils with high or very high liquefaction levels, as acknowledged on page 4.7-3 of the EIR. However, as analyzed under Impact GEO-2 in Section 4.7, *Geology and Soils*, compliance with requirements of the California Building Code and implementation of the County General Plan goals and policies would reduce impacts related to liquefaction to a less than significant level.

Response 15.8

The commenter asks how their property became a by-right "target" while the County allowed for other development such as rental properties and hotels to be taken out of the housing marker in West County. The commenter asks if an alternative would be to eliminate vacation rental properties, and states that this is their preference.

This comment does not pertain to the contents of the Draft EIR, but it has been noted and passed onto decision-makers.

Response 15.9

The commenter suggests that all public meetings should be held in person in order to increase public participation. The commenter asks how many properties are being taken away from parcel owners.

This comment does not pertain to the contents of the Draft EIR, but it has been noted and passed onto decision-makers.

EIR Public Comment 16

COMMENTER: Sean Maley

DATE: January 31, 2023

Response 16.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 16.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 16.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 16.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 16.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 16.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 16.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 17

COMMENTER: Sue Zaharoff

DATE: January 31, 2023

Response 17.1

The commenter states that they oppose the rezoning of site FOR-2 in Forestville. The commenter expresses concerns regarding the areas existing infrastructure, future traffic and truck routes, emergency egress, water supply, pedestrian safety, limited fire and police services, parking, and runoff. The commenter states that rezoning site FOR-2 would end Forestville.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element. Please refer to Master Response EXST regarding existing services and infrastructure. Refer to Master Response TRA regarding traffic congestion. Refer to Master Response UTIL and Section 4.18, *Utilities and Service Systems*, regarding water supply and infrastructures. Refer to Master Response EMG regarding emergency egress. Pedestrian safety is analyzed in Section 4.16, *Transportation*, of the EIR. Refer to Section 4.15, *Public Services and Recreation*, regarding fire and police services. Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

EIR Public Comment 18

COMMENTER: Arelene Warner

DATE: February 1, 2023

Response 18.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 18.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents. The commenter expresses concern regarding the deterioration of Laughlin Roads due to an increased number of vehicles using the road.

Refer to Response 14.2.

Response 18.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages. The commenter states that existing residents are currently burdened by a sewer tax.

Refer to Response 14.3.

Response 18.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 18.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 18.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 18.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 19

COMMENTER: Neil Shevlin

DATE: February 1, 2023

Response 19.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 19.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 19.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 11\4.3.

Response 19.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 19.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 19.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 19.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 20

COMMENTER: Becky Boyle

DATE: January 31, 2023

Response 20.1

The commenter expresses concerns regarding the increase in future population in Forestville. The states that Forestville has inadequate infrastructure to support future development.

Refer to Response 11.1

Response 20.2

The commenter states that there is not a school directly across the street from Rezoning Site FOR-2.

Refer to Response 11.2.

Response 20.3

The commenter expresses concern regarding the road encircling Rezoning Site FOR-2. The commenter states that the roads near all Rezoning Sites located in Forestville are small county roads.

Refer to Response 11.3.

Response 20.4

The commenter expresses concern regarding urban renewal effects, displacement, loss of character, threat to local businesses, community conflicts, pollution-related health conditions, parking, and sanitation.

Refer to Response 11.4.

Response 20.5

The commenter asks where there is a discussion on how the County plans to widen roads, add left turn lanes, round-a-bouts, and crosswalks for pedestrian safety. The commenter asks where a road safety study may be found.

Refer to Response 11.5.

Response 20.6

The commenter states that there is no inclusion of feasible mitigation measures in the Draft EIR addressing the aesthetic impacts of Rezoning Sites FOR-1, FOR-3, and FOR-5. The commenter states that these sites would have significant and unavoidable impacts.

Refer to Response 11.6.

Response 20.7

The commenter notes that Tables 4.9-1 and 4.9-2 in the Draft EIR show that Rezoning Sites FOR-1, FOR-5, and FOR-6 are listed as being on "Existing Hazardous Material Contamination." The commenter states that the Draft EIR does not include a study describing the potential health risks to future residents, students near the Rezoning Sites, and impacts to the surrounding community. The commenter states that they do not see a study on how these hazardous materials may impact water resources near the Rezoning Sites.

Refer to Response 11.7.

Response 20.8

The commenter states that in Section 4.15.1a: Fire Protection, EMT response times are shown as prior to when departments were combined. The commenter states that they do not see a study regarding ratio of emergency calls per capita.

Refer to Response 11.8.

Response 20.9

The commenter asks if, considering there would be a significant and unavoidable impact regarding greenhouse gas emissions, it would make more sense to build development in a less car dependent area. The commenter asks if it would be advisable, particularly for low-income residents, for future development to be centered near urbanized areas with additional services.

Refer to Response 11.9.

Response 20.10

The commenter states that Forestville does not have enough existing commercial services to support future population growth.

Refer to Response 11.10.

Response 20.11

The commenter expresses understanding of State housing requirements and why the County must comply. The commenter states that Forestville is being pushed beyond what the area can realistically support.

Refer to Response 11.11.

Response 20.12

The commenter urges that the County choose the alternative where all six parcels in Forestville are not rezoned. The commenter asks that the same consideration be given for any sites with hazardous histories.

Refer to Response 11.12.

Response 20.13

The commenter asks that the County avoid considering sites FOR-1, FOR-2, FOR-3, FOR-4, FOR-5, and FOR-6 at minimum. The commenter asks that the County find other sites where future residents will have adequate commercial services, better roads, and the least amount of impacts to the environment.

Refer to Response 11.13.

EIR Public Comment 21

COMMENTER: Janice Stenger

DATE: December 31, 2022

Response 21.1

The commenter expresses opposition to the proposed project.

This comment is not relevant to the environmental impact analysis of the proposed project. This comment has been noted.

Response 21.2

The commenter expresses concerns regarding wildfire risk and wildfire mapping. The commenter states that there are incongruencies between County maps and PG&E fire maps.

Please refer to Figure 4.19-3 in Section 4.19, *Wildfire*, of the Draft EIR. As stated therein, the graphic relies on the most up-to-date data obtained from CAL FIRE. CAL FIRE determines fire hazard severity based on factors including fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread. PG&E's community wildfire safety program relies on a Fire-Threat Map of California created by the California Public Utilities Commission (CPUC) called the CPUC High Fire Threat District map to show places with a high risk of wildfires that could put people and property in danger of utility-associated wildfires. CEQA analysis regarding wildfire is based on CAL FIRE fire hazard severity zones in the currently adopted fire hazard severity zone maps. Additionally, the CAL FIRE maps were last updated in 2007. While CALFIRE is currently working on updating them using 2022 data, and released draft maps in 2023, the new maps have not yet been adopted. As such, the currently adopted 2007 versions of CALFIRE Wildfire maps were used in the wildfire analysis for this project.

Response 21.3

The commenter expresses concerns regarding traffic in Guerneville.

Rezoning Sites in Guerneville may be accessed by roadways at least 20 feet in width or greater; however, future development facilitated by the project on Rezoning Sites would need to ensure that adjacent roads meet County width requirements. Refer to Master Response EXST regarding the current dead-end roadways and Master Response EMG.

While not required by CEQA, as discussed in Response O-2.7, a congestion-based LOS analysis was done for information purposes. As shown in Appendix TRA of the Draft EIR, traffic volumes in Guerneville were calculated for two intersections: Armstrong Woods Road/River Road and State Route 116/River Road, for informational purposes. Full buildout of all four Rezoning Sites in Guerneville would result in an increase of no more than 133 peak hour trips, or approximately 1,330 daily trips at these intersections. As shown in the informational analysis provided in Appendix TRA, full buildout of Guerneville Rezoning Sites would not degrade roadway level of service (LOS) operations beyond LOS B, where roadway operations occur with low delay, good progression, and/or short cycle lengths.

Response 21.4

The commenter expresses opposition to the proposed Rezoning Sites in Guerneville. The commenter expresses opposition to Proposition 19 and expresses concerns regarding the future of their property. The commenter asks how the proposed project will impact the rental market and expresses discontent with the number of short-term rentals in the area.

This comment does not pertain to the environmental analysis or conclusions of the Draft EIR. This comment has been noted.

Response 21.5

The commenter expresses concern and frustration with short-term rentals. The commenter asks if the removal of a local school is indicative of the town's decline.

This comment does not pertain to the environmental analysis or conclusions of the Draft EIR. This comment has been noted.

Response 21.6

The commenter describes the purpose of the Workforce Housing (WH) Combining Zone. The commenter asks a series of questions regarding whether or not their property and the property of another community member were appropriately chosen to be included as Rezoning Sites. The commenter claims that the General Plan was updated two years ago and asks why the proposed project was not included as part of that update.

The commenter is incorrect that the General Plan was updated two years ago. The last comprehensive update to the General Plan was in 2008. This comment has been noted. Please refer to Master Response SITE regarding the Rezoning Site selection process and identification. Regarding updates to the General Plan and Housing Element, the County Housing Element is a component of the County General Plan that primarily addresses housing matters for the unincorporated areas of Sonoma County. Under State law, the Housing Element must be updated on an eight-year cycle, which is overseen by the California Department of Housing and Community Development (HCD). The County Housing Element is currently being updated for the sixth cycle, which encompasses the 2023-2031 planning period. The proposed project provides evidence of the County's ability to accommodate the Regional Housing Needs Assessment through the year 2031, as established by the Association of Bay Area Governments (ABAG), and identifies the rezone program needed to reach the required housing capacity.

Response 21.7

The commenter expresses discontent regarding the amount of notice they received about the Draft EIR. The commenter states that their local library had not received a copy of the Draft EIR. The commenter expresses dissatisfaction with public meetings being held virtually.

The County of Sonoma distributed a Notice of Preparation of the Draft EIR and held a public scoping meeting for input on preparation of the Draft EIR, as described in Section 1, *Introduction,* on page 1-4 of the Draft EIR. Public participation efforts undertaken for the Housing Element Update itself are detailed in the Draft Housing Element beginning on page 2 under Section 1.4, *Public Participation.* Refer also to past noticing regarding the Rezoning Sites for Housing Process in Master Response SITE.

Nonetheless, this comment is not relevant to the environmental impact analysis of the proposed project. The commenters opinion is noted and has been passed on to decision-makers. Section 150587(g) of the *CEQA Guidelines* says the lead agency should furnish copies of the EIR to the public library systems, but not that it is required. However, the County made the document available at six Sonoma County libraries. Refer to Response 15.3 regarding the EIR's presence in area libraries, and online at https://permitsonoma.org/longrangeplans/proposedlong-rangeplans/housingelement/.

Response 21.8

The commenter states that the residents on Laughlin Road, Valley Lane, and Cutten Drive did not receive adequate notification of the Rezoning Sites located on Laughlin Road. The commenter expresses concerns regarding increased traffic and wildfire risk in the area including on dead-end roads.

This comment has been noted. Refer to Response 21.7 above.

Please refer to Response 21.3 regarding traffic impacts resulting from development of the Rezoning Sites in Guerneville. Please refer to Master Response FIRE regarding wildfire risk and evacuation. Refer to Response 21.2 regarding the difference between PG&E and CAL FIRE fire designations. Refer to Master Response EMG regarding evacuation access concerns.

Response 21.9

The commenter provides a summary of historical sewer issues and expresses concerns regarding the existing sewer system in Guerneville.

This comment has been noted. Please refer to Master Response UTIL regarding concerns about the existing sewer system. As stated therein, "the wastewater capacity for sites GUE-1 through GUE-4, GRA-1 through GRA-5, and PET-1 through PET-4 is either unknown or limited. These sites would require the construction of expanded wastewater facilities, including upgraded pipelines and potentially new pumps."

Response 21.10

The commenter expresses concerns regarding existing flood conditions near the Rezoning Sites.

This comment is noted. Please refer to Master Response EXST regarding existing conditions. . Refer to Figure 4.10-5 for a FEMA floodplain map of the Guerneville site. GUE-2 is near but not within the 100-year floodplain.

Response 21.11

The commenter includes a copy of a separate letter submitted to the County.

Please refer to EIR Public Comment 15 for a full summary of the attached letter and responses to each concern raised therein.

EIR Public Comment 22

COMMENTER: Dan O'Leary

DATE: January 31, 2023

Response 22.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 22.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 22.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 22.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sites are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 22.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 22.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 22.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 23

COMMENTER: Karyn Pulley

DATE: January 31, 2023

Response 23.1

The commenter states that their comments are regarding site FOR-2. The commenter asks what changes would be imposed on their land and if they would be forced into guidelines for future property changes.

Please refer to Master Response HE regarding the purpose of the proposed project. This comment has been noted and passed onto decision-makers. Rezoning would not force changes to the existing uses on-site; however, if rezoning is approved, future land use changes on the site would be subject to the applicable zoning code requirements for that zone.

Response 23.2

The commenter states that they have no intention of selling their land. The commenter states that they will be submitting further comments.

Please refer to Master Response HE regarding opposition to the Housing Element. This comment has been noted and passed onto decision-makers. Rezoning, or consideration of a site for rezoning, does not require intentions to sell land.

EIR Public Comment 24

COMMENTER: Chriss Bross

DATE: February 1, 2023

Response 24.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR. The commenter expresses particular concern regarding the health and safety of residents, and expresses concerns about emergency evacuation in the event of a flood.

Refer to Response 14.1.

Response 24.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 24.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 24.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 24.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 24.5.

Response 24.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 24.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 25

COMMENTER: February 1, 2023

DATE: Cindy Romero

Response 25.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 25.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 25.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 25.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 25.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 25.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 25.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 26

COMMENTER: Daneene Bell

DATE: February 1, 2023

Response 26.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR. The commenter expresses particular concern regarding the health and safety of residents, and expresses concerns about emergency evacuation in the event of a flood.

Refer to Response 14.1.

Response 26.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 26.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 26.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 26.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 26.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 26.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 27

COMMENTER: Denise Mobley

DATE: February 1, 2023

Response 27.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1

Response 27.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 27.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 27.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 27.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 27.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14..6.

Response 27.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 28

COMMENTER: Leila Anderson

DATE: February 1, 2023

Response 28.1

The commenter expresses concern regarding egress from Forestville in the event of a wildfire, and how an increase in future population may create additional evacuation challenges. The commenter states that it is unlikely more water will become available in the future, and that it is unlikely that fires will stop.

This comment has been noted. Please refer to Master Response FIRE for information regarding wildfire impacts and emergency evacuation.

EIR Public Comment 29

COMMENTER: Neighbors of FOR-2

DATE: February 1, 2023

Response 29.1

The commenter requests that FOR-2 be removed from the rezoning plan due to reasons stated in Alternative 3 of the EIR, as they believe the cost of mitigation makes the project too expensive and there is a risk that the property will never be developed.

This comment has been noted and passed onto decision-makers. Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites.

Response 29.2

The commenter summarizes the Land Use Element of the County General Plan and states the project slated for FOR-2 is inconsistent with the existing General Plan.

Consistency with the Sonoma County General Plan is analyzed in Section 4.11, *Land Use and Planning*. As shown in Table 4.11-3, the project is consistent with the vast majority of relevant policies in the County General Plan, and a project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation.

Response 29.3

The commenter expresses concern with additional residents including potential multi-story buildings blocking scenic vistas and overlooking backyards, noise levels, and nighttime light and glare. The commenter states there are no sidewalks and narrow roadway shoulders, and that traffic increases would make walking less safe and desirable. The commenter points out an error regarding identification of a school near FOR-2.

Regarding impacts to scenic vistas please refer to Section 4.1, *Aesthetics*, of the Draft EIR. As discussed under Impact AES-1 there are four Rezoning Sites that would have significant impacts to scenic vistas. However, this does not include Rezoning Site FOR-2 or any other Rezoning Site located in Forestville. As discussed under Impact AES-2, several Rezoning Sites in Forestville border a state scenic highway and scenic resources could be affected if individual projects are visible from these roadways. However, there is no feasible mitigation measures available, as development facilitated by the proposed project on Rezoning Sites cannot be made to comply with subjective design guidelines, and thus projects on these ten sites may remove or damage scenic resources within a State-designated highway, particularly by changing the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Regarding impacts due to light and glare, impacts would be less than significant with mitigation incorporated. Mitigation Measure AES-2 would be implemented requiring that all project designs shall

include specific exterior lighting plans that meet the minimum requirements. With implementation of AES-2, impacts from light and glare would be reduced to a less than significant level.

Please refer to Section 4.13, *Noise,* of the Draft EIR for a full analysis of potential noise impacts induced by the proposed project. As stated therein, impacts to noise could be significant. However, compliance with all applicable noise regulations and implementation of the proposed mitigation measures would reduce all noise impacts to a less than significant level.

Regarding the Forestville Youth Park, the commenter is correct, and the EIR has been revised to correctly identify the Forestville Youth Park

Response 29.4

The commenter expresses concern regarding existing traffic levels on Mirabel Road relating to truck trips, fast-moving traffic, no turn lanes, and limited sight lines. The commenter offers information regarding the feasibility of exit points for the parcel and estimations of traffic levels.

Refer to O-2.7 regarding traffic levels on Mirabel Road.

Response 29.5

The commenter claims that the community funded Forestville Youth Park would see a considerable increase in use that would lead to physical deterioration of the facility, and pedestrian safety crossing Mirabel Road to access the park would be a safety concern.

Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. As stated therein, development facilitated by the project on Rezoning Sites would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other objectives and would not increase the use of existing neighborhood and regional parks such that substantial physical deterioration of the facility would occur or be accelerated.

In addition, pursuant to Sonoma County Code Section 20-65, project applicant(s) for development facilitated by the proposed project on Rezoning Sites would be required to pay park fees in the amount of $3,678 per residential unit in order to offset impacts related to increased demand at existing recreation facilities.. Subdivision projects must dedicate parkland or pay an in-lieu fee pursuant to Sonoma County Code Section 25-58. Therefore, impacts to parks would be less than significant.

Response 29.6

The commenter provides background information on sewer lines in the vicinity of FOR-2, and states the EIR does not define if the existing line in Hwy 116 is capable of handling the increased output from the FOR-2 project. The commenter notes that if it is insufficient, the line would have to be re-engineered and replaced under Caltrans oversight, and that the if a development is approved on FOR-2, it should require sewer connections.

This comment is noted. Please refer to Master Response EXST regarding existing conditions of services and infrastructure. Please refer to Master Response UTIL for information regarding the existing sewer system and planned improvements. Additionally, there are no known capacity issues in the collection system, pursuant to discussions with the general manager, as discussed in Appendix WSS of the EIR. However, further hydraulic analysis may be required by Forestville Water District prior to construction approval for individual developments.

Response 29.7

The commenter states FOR-2 is 33 yards from a moderately high fire zone and quotes the EIR regarding emergency access during evacuations.

The commenter's quotation is not a direct quote, but generally accurate. Page 4.19-26 of the EIR states that "[a]ccess to Rezoning Sites FOR-2, FOR-4, GRA-2, AGU-1, and AGU-2 currently does not meet County road standards of 20 feet in width or greater, and access to Rezoning Sites GUE-1 through GUE-3 also appear not to meet this requirement. Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways would ~~could~~ be required." The commenter does not bring up any concerns with the analysis presented in the EIR; no changes are warranted.

Response 29.8

The commenter restates their position regarding the FOR-2 rezoning.

Refer to Response 29.1.

EIR Public Comment 30

COMMENTER: Meagan Nolan

DATE: February 1, 2023

Response 30.1

The commenter states that they are a co-inheritor of the property at 6934 Mirabel Road. The commenter asserts that they have no intention of selling the property.

This comment has been noted. It does not pertain to the analysis or conclusions in the EIR.

EIR Public Comment 31

COMMENTER: Neil Shevlin

DATE: February 1, 2023

Response 31.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 31.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 31.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 31.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 31.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 31.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 31.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 32

COMMENTER: Oscar Ayala

DATE: February 1, 2023

Response 32.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 32.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 32.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 32.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 32.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 32.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 32.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 33

COMMENTER: Rio Olesky

DATE: February 1, 2023

Response 33.1

The commenter states that the roads surrounding site FOR-2 are not built to withstand future development and population increases. The commenter expresses concern regarding pedestrian and bicyclist safety on these roads.

Refer to Response 14.3.

Response 33.2

The commenter states that the Draft EIR does not include a discussion on displacement, loss of character, threat to local businesses, community conflicts, pollution-related health conditions, parking, and sanitation needs.

Refer to Response 14.4.

Response 33.3

The commenter asks where there is a discussion on how the County plans to widen roads, add left turn lanes, round-a-bouts, and crosswalks for pedestrian safety.

Refer to Response 14.5.

Response 33.4

The commenter asks where a road safety study may be found. The commenter expresses concern regarding potential accidents and the safety of residents.

Refer to Response 14.5.

Response 33.5

The commenter states that there is no inclusion of feasible mitigation measures in the Draft EIR addressing the aesthetic impacts of sites FOR-1, FOR-3, and FOR-5. The commenter states that these sites would have significant and unavoidable impacts.

Refer to Response 14.6.

Response 33.6

The commenter notes that Tables 4.9-1 and 4.9-2 in the Draft EIR show that sites FOR-1, FOR-5, and FOR-6 are listed as being on "Existing Hazardous Material Contamination." The commenter states that the Draft EIR does not include a study describing the potential health risks to future residents, students near the sites, and impacts to the surrounding community. The commenter states that they do not see a study on how these hazardous materials may impact water resources near the sites.

Refer to Response 14.7.

EIR Public Comment 34

COMMENTER: Sally Percich

DATE: February 1, 2023

Response 34.1

The commenter expresses opposition to the rezone site located at 6898 Nolan Road (FOR-2). The commenter expresses concern regarding increased traffic and inadequate availability of water resources. The commenter notes that there is no sewer system in place in the neighborhood surrounding the site.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and Master Response UTIL regarding sewer system infrastructure.

Response 34.2

The commenter states that 6555 Covey Road (FOR-1) and 6220 Highway 116 (FOR-3) are both acceptable sites.

This comment has been noted and passed onto decision-makers.

Response 34.3

The commenter states that Forestville does not have the infrastructure for a 50 percent increase in population.

This comment has been noted. Please refer to Master Response EXST regarding existing services and infrastructure. The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter.

Response 34.4

The commenter suggests that rezoning only one vineyard property in the Forestville area would solve the housing shortage.

This comment has been noted. Refer to Master Response SITE.

EIR Public Comment 35

COMMENTER: Sean Maley

DATE: February 1, 2023

Response 35.1

The commenter states that they are a resident on Laughlin Road and expresses opposition to rezoning sites on Laughlin Road and Cutten Drive.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 35.2

The commenter asks how the County will handle flooding on Armstrong Woods Road if evacuation is necessary.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuations. Refer to Section 4.10, *Hydrology and Water Quality*, of the EIR for additional information relating to flooding analysis.

Response 35.3

The commenter states that risk of wildfire has increased and future development in the area may be catastrophic.

This comment has been noted. Please refer to Master Response FIRE regarding wildfire risk.

Response 35.4

The commenter states that Laughlin Road and Cutten Drive are narrow, with some areas allowing only one car to pass at a time. The commenter asks how the County plans on addressing this issue.

This comment has been noted. Please refer to Master Response EXST regarding existing conditions of services and infrastructure.

Response 35.5

The commenter states that the area already experiences traffic congestion, especially during crush season. The commenter expresses concern regarding how an increase in future vehicles will impact traffic.

Refer to Comment O-2.7 regarding analysis of congestion under CEQA. As shown in Appendix TRA of the Draft EIR, traffic volumes in Guerneville were calculated for two intersections: Armstrong Woods Road/River Road and State Route 116/River Road, for informational purposes. Full buildout of all four Rezoning Sites in Guerneville would result in an increase of no more than 133 peak hour trips, or approximately 1,330 daily trips at these intersections. As shown in the informational analysis provided in Appendix TRA, full buildout of Guerneville Rezoning Sites would not degrade roadway level of service (LOS) operations beyond LOS B, where roadway operations occur with low delay, good progression, and/or short cycle lengths.

Response 35.6

The commenter states that Laughlin Road dead-ends making ingress and egress challenging, especially during an evacuation event.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation. Refer also to Master Response EXST regarding the existing dead-end.

Response 35.7

The commenter asks how the County plans to address the present condition on the sewer system.

This comment has been noted. Please refer to Master Response UTIL for information regarding concerns about the existing sewer system. Refer also to Master Response EXST, as this comment relates to existing problems with the sewer system.

EIR Public Comment 36

COMMENTER: Janice Stenger

DATE: February 2, 2023

Response 36.1

The commenter asks if it is true that if there are state or Federal funds use for future development, the units can't be provided to locals only or people who are returning to the area that were born there. The commenter asks if this would be due to the cost of housing. The commenter asks if it would be true that future development would be for people from any state in the country or other counties in the state.

This comment is not relevant to the environmental impact analysis of the proposed project. The cost of housing and future residents who may reside in new developments is not determined through CEQA. Restricting who may potentially reside in future developments based on past or existing connection to the county would be a violation of the Fair Housing Act.

Response 36.2

The commenter asks if developers can get a "pass" and build higher cost housing. The commenter asks if a trailer park could be developed there.

This comment is not relevant to the environmental impact analysis of the proposed project. The cost of housing is not determined through CEQA. Regarding the question of whether or not a trailer park may be developed, development would be based on site-specifical proposals or development applications received after rezoning takes place.

EIR Public Comment 37

COMMENTER: Kelly Joyce

DATE: February 2, 2023

Response 37.1

The commenter states that they are a resident of Forestville. The commenter expresses concern regarding pedestrian safety in the area. The commenter states that due to the unsafe road conditions, they drive their child to school rather than having their child cross the street, which would take less time if there were safer crossings.

Please refer to Master Response EXST regarding existing roadway problems. The situation the commenter is describing currently exists and the comment is not caused by the project.

Response 37.2

The commenter states that floods happen several times a year near the Packing House Road development, which cut off access in both directions on Highway 116.

Please refer to Master Response EXST regarding existing flooding problems. The situation the commenter is describing currently exists and the issue is not caused by the project.

Please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR. As discussed therein, development facilitated by the proposed project on Rezoning Sites would be required to comply with the SWRCB Construction General Permit, which requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) for projects that disturb one acre or more of land. Additionally, as discussed on page 4.10-26 of the Draft EIR, development facilitated by the proposed project on Rezoning Sites would not exceed the capacity of existing or planned stormwater drainage systems. As stated therein, development facilitated by the project on Rezoning Sites would alter the existing drainage patterns in the Rezoning Sites through introduction of new impervious surfaces and infrastructure. However, the Sonoma County General Plan includes goals and policies that are intended to reduce flood hazards through minimal alterations to designated floodplains, which would reduce the potential for increased susceptibility to flooding on or off site.

Implementation of these goals and policies would ensure that the runoff from development facilitated by the project on Rezoning Sites does not exceed the capacity of existing and future storm drain systems. The project would not alter the existing drainage patterns or contribute runoff water in a manner which would result in substantial erosion, siltation, or flooding, nor would it exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

Response 37.3

The commenter understands the need for increased housing, but believes that a 37 percent increase in the population of Forestville would be unfeasible. The commenter asks how the County plans to move forward with future development without having a plan for potential infrastructure changes.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and Master Response SITE for additional information regarding the Rezoning Site selection process. Refer to Master Response UTIL regarding impacts to utility infrastructure.

Response 37.4

The commenter expresses concerns regarding how future development will impact emergency evacuation in the area.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation.

EIR Public Comment 38

COMMENTER: Louis Hughes

DATE: February 2, 2023

Response 38.1

The commenter expresses opposition to rezoning sites in Forestville and states the area does not have the infrastructure necessary to support the proposed growth. The commenter states that future plans for development should be thoroughly thought out.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element and Master Response UTIL regarding existing services and infrastructure concerns.

Response 38.2

The commenter states that it feels that state housing laws are forced on communities.

This comment is not relevant to the environmental impact analysis for the proposed project. This comment has been noted.

EIR Public Comment 39

COMMENTER: Lucy Hardcastle

DATE: February 2, 2023

Response 39.1

The commenter states that increased traffic and difficulty finding parking in downtown Forestville will negatively impact the quality of life for residents. The commenter states that existing plans to upgrade sidewalks and crosswalks will eliminate parking.

As shown in Appendix TRA of the Draft EIR, traffic volumes in Forestville were calculated for one intersection: State Route 116/Mirabel Road, for informational purposes. Full buildout of all six Rezoning Sites in Forestville would result in any new deficiencies. However, as discussed in Appendix TRA, since all of the development is not anticipated to be built in the near-term, the substantial effects noted may take years to materialize. Thus, no near-term intersection improvements have been identified as required. Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

Response 39.2

The commenter states that adding over 600 housing units will result in gridlock and overcome Forestville's ability to handle the flow of traffic. The commenter expresses concern regarding stalling quarry trucks and diesel particulate matter that could collect in the area, and how this particulate matter will impact restaurant outdoor seating operations.

Please refer to Response 39.1 regarding anticipated traffic. In regard to air quality concerns, please refer to Section 4.3, *Air Quality,* of the Draft EIR. As stated therein, vehicle trips for development facilitated by the Housing Element on the Rezoning Sites were calculated using the daily VMT and are expected to increase over existing zoning by 93,260 VMT, a number developed during the transportation assessment. The proposed net percentage VMT increase associated with the proposed project (approximately 836 percent) would be less than the net percentage population increase (approximately 896 percent). Therefore, the project's VMT increase would not conflict with the BAAQMD's 2017 *CEQA Air Quality Guidelines* operational plan-level significance thresholds for criteria air pollutants, and would be consistent with the 2017 Clean Air Plan. In addition, operation of development facilitated by the proposed project on Rezoning Sites does not involve designated sources of toxic air contaminants; therefore, the project is not considered a source of toxic air contaminants. Impacts to air quality would be less than significant.

Response 39.3

The commenter states that affordable housing is welcomed but asks that the County plans all future development thoughtfully and considers existing infrastructural inadequacies.

This comment has been noted and passed on to decision-makers for their consideration.

EIR Public Comment 40

COMMENTER: Mary Mount

DATE: February 2, 2023

Response 40.1

The commenter expresses opposition to the project

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 40.2

The commenter states that there is no ability to widen Laughlin Road or Cutten Drive. The commenter states that Laughlin Road is a dead-end road, as is Armstrong Woods Road which regularly floods. The commenter expresses concern regarding emergency evacuation.

This comment has been noted. Please refer to Response 35.5 regarding road widths of Laughlin Road and Cutten Drive. Please refer to Master Response EMG regarding emergency evacuation.

Response 40.3

The commenter states that the sewer system is outdated and would need a complete overhaul. The commenter asks what the County plans.

This comment has been noted. Please refer to Master Response UTIL regarding concerns about the existing sewer system.

Response 40.4

The commenter asks that development be considered for Santa Rosa, Windsor, and Healdsburg instead. The commenter suggests that there is more open space in those areas.

This comment has been noted. Please refer to Master Response SITE regarding the Rezoning Site selection process. The proposed project involves rezoning to facilitate implementation of the Sonoma County Housing Element; Sonoma County does not have authority to rezone parcels within other cities in the county as they are separate jurisdictions. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Healdsburg and Windsor, have their own ABAG-assigned RHNA and housing elements.

EIR Public Comment 41

COMMENTER: Nick Pulley

DATE: February 2, 2023

Response 41.1

The commenter states that they live at site FOR-2. The commenter shares about their family history at this site and the importance of the site to them. The commenter states that they only recently became aware of the rezoning of the site and expresses frustration with the lack of communication they have received. The commenter states that they have no intention of selling their property.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 41.2

The commenter states that they hope rezoning of the site will not impede their ability to use the land for agriculture.

This comment is not relevant to the environmental impact analysis of the proposed project. This comment has been noted. Continuation of existing uses would not be affected by the rezoning.

EIR Public Comment 42

COMMENTER: Tim Patriarca and James Wong

DATE: February 2, 2023

Response 42.1

The commenter expresses opposition to Rezoning Site GRA-4.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element and Rezoning Site selection.

Response 42.2

The commenter states that the roads near Rezoning Site GRA-4 lack sidewalks, shoulders, and lighting. The commenter expresses concern regarding road safety.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure. This comment has been noted.

Response 42.3

The commenter expresses concerns regarding increased use of groundwater. The commenter states there is no parking available in the area, and due to a lack of commercial services in the area, future residents will be car-dependent.

Please refer to pages 4.10-25 and 4.10-26 of Section 4.10, *Hydrology and Water Quality,* of the Draft EIR. As stated therein, policies under General Plan Goal WR-4 encourage water conservation, which would decrease the project's demand on water throughout the County and therefore decrease the demand on local groundwater supplies. Compliance with these existing requirements would ensure that impacts to groundwater supplies would be less than significant.

Regarding the commenter's concern on traffic, please refer to Section 4.16, *Transportation,* of the Draft EIR. As stated under Impact TRA-1 starting on page 4.16-14, average total home-based vehicle miles travelled (VMT) per resident would decrease minimally with implementation of the project. However, VMT per resident would be 16.0, above the threshold value of 13.0. For this reason, Mitigation Measure TRA-1 will be implemented aiming to reduce overall VMT through various trip reduction programs such as, but not limited to, bicycle programs, bus service enhancements, and carpool programs.

Regarding the commenter's concerns about existing parking and nearby commercial services, please refer to Master Response EXST. This comment has been noted. Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

Response 42.4

The commenter states that the parcels surrounding Rezoning Site GRA-4 are open space, two of which include historical apple orchards. The commenter states that this open space supports the local ecosystem. The commenter states that the proposed site contains heritage oaks and apple trees. The commenter asks how development is appropriate for this site.

Please refer to Figure 4.11-5 in Section 4.11, *Land Use and Housing*, of the Draft EIR. As depicted therein, Rezoning Site GRA-4 is currently zoned as rural residential with low density residential (R1) and rural

residential (RR) zoning to the south and east, and agriculture and residential (AR) to the north and west of the site. As discussed on pages 4.2-16 and 4.2-17 of Section 4.2, *Agriculture and Forestry Resources,* Rezoning Site GRA-4 is not listed as having directly adjacent agricultural uses that would fall under the Right to Farm ordinance and thus, development facilitated by the project on Rezoning Sites would not have a significant impact on surrounding agricultural lands.

In regard to the commenters' concerns about biological resources, please refer to Section 4.4, *Biological Resources,* of the Draft EIR. Under Impact BIO-1 starting on page 4.4-28, it is stated that projects that would result in ground disturbance through clearing/grading or vegetation trimming or removal, and a project-specific biological assessment would be required through the implementation of Mitigation Measure BIO-1. Additional mitigation measures would then be required based on the result of the project-specific biological analysis and may include one or more of the additional mitigation measures (Mitigation Measure BIO-2 through Mitigation Measure BIO-12) to reduce impacts to a less than significant level. In addition, as discussed on page 4.4-39, the Sonoma County Zoning Code Chapter 26D and Sonoma County Zoning Code Article 88, Section 26-88-010(m), *Tree Protection Ordinance*, provides for the protection of heritage and landmark trees. Article 67, *Valley Oak Habitat Combining District*, of the Sonoma County Zoning Code provides protection for oak woodland habitats. Compliance with these ordinances would reduce impacts to either oak species to a less than significant level.

In regard to the commenter's concern about the appropriateness of Rezoning Site GRA-4, please refer to Master Response SITE. This comment has been noted.

Response 42.5

The commenter states that it is their understanding that the site is already zoned for additional development. The commenter requests that the parcel's existing zoning remains.

Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. This comment will be passed on to decision-makers.

Response 42.6

The commenter attaches a copy of an identical letter.

Please refer to Responses 42.1 through 42.5 above for a summary of the commenters' concerns and applicable responses.

EIR Public Comment 43

COMMENTER: Adele Westling

DATE: February 3, 2023

Response 43.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 43.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 43.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 43.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 43.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 43.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 43.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element. Please refer to Response 14.7.

EIR Public Comment 44

COMMENTER: Andrea Oreck

DATE: February 3, 2023

Response 44.1

The commenter states that a development sign was placed on a hillside overlooking the inland hamlet of Bodega. The commenter asks where water will be coming from to be supplied to this development. The commenter states there is no sewage treatment plant for additional residents in this sensitive watershed area.

This comment refers to a development project not associated with the proposed project or analysis provided in the Draft EIR. No response is warranted.

Response 44.2

The commenter states that two old homes and apple orchards were demolished for the development of a 164-unit housing complex on Bodega Highway. The commenter states that traffic on this road becomes backed up for miles.

This comment has been noted. Please refer to Master Response EXST regarding existing conditions of services and infrastructure. In addition, this comment refers to a development project not associated with the proposed project or analysis provided in the Draft EIR. No response is warranted.

Response 44.3

The commenter expresses opposition to the imposition of state housing laws. The commenter asserts that while more affordable housing is needed, it should not come at the expense of the quality of life for existing residents. The commenter urges the County to push back.

This comment has been noted and passed on to decision-makers for consideration. Please refer to Master Response HE regarding opposition to the Housing Element.

EIR Public Comment 45

COMMENTER: Becky Boyle

DATE: February 3, 2023

Response 45.1

The commenter points to page 4.15-11 of the Draft EIR and states that Forestville is taking on a burden of the state's housing quota in comparison to other unincorporated areas in Sonoma County. The commenter states that a 25 percent increase in population is too much for Forestville and the area does not have the infrastructure to support that growth.

Please refer to Response 11.1.

Response 45.2

The commenter states that the Draft EIR is incorrect on page 4.1-18 of the Draft EIR. The commenter asserts that there is no school located across from site FOR-2 on Mirabel Road.

Please refer to Response 11.2.

Response 45.3

The commenter states that the roads around Rezoning Site FOR-2 are not adequate to support an increase in population. The commenter states that the roads are small and have existing safety hazards, and that increasing the population would pose a risk to bicyclists and pedestrians in the area. The commenter claims there is no mention that the roads in Forestville are small country roads.

Please refer to Response 11.3.

Response 45.4

The commenter states that the Draft EIR does not include a discussion on displacement, loss of character, threat to local businesses, community conflicts, pollution-related health conditions, parking, and sanitation needs.

Please refer to Response 11.4.

Response 45.5

The commenter asks where there is a discussion on how the County plans to widen roads, add left turn lanes, round-a-bouts, and crosswalks for pedestrian safety. The commenter asks where a road safety study may be found. The commenter expresses concerns regarding pedestrian safety.

Please refer to Response 11.5.

Response 45.6

The commenter states that there is no inclusion of feasible mitigation measures in the Draft EIR addressing the aesthetic impacts of Rezoning Sites FOR-1, FOR-3, and FOR-5. The commenter states that these sites would have significant and unavoidable impacts.

Please refer to Response 11.6.

Response 45.7

The commenter notes that Tables 4.9-1 and 4.9-2 in the Draft EIR show that Rezoning Sites FOR-1, FOR-5, and FOR-6 are listed as being on "Existing Hazardous Material Contamination." The commenter states that the Draft EIR does not include a study describing the potential health risks to future residents, students near the Rezoning Sites, and impacts to the surrounding community. The commenter states that they do not see a study on how these hazardous materials may impact water resources near the Rezoning Sites.

Please refer to Response 11.7.

Response 45.8

The commenter states that in Section 4.15.1a: Fire Protection, EMT response times are shown as prior to when departments were combined. The commenter states that they do not see a study regarding ratio of emergency calls per capita.

Please refer to Response 11.8.

Response 45.9

The commenter quotes from the EIR and asks if, considering there would be a significant and unavoidable impact regarding greenhouse gas emissions, it would make more sense to build development in a less car dependent area. The commenter asks if it would be advisable, particularly for low-income residents, for future development to be centered near urbanized areas with additional services.

Please refer to Response 11.9.

Response 45.10

The commenter states that Forestville does not have enough existing commercial services to support future population growth.

Please refer to Response 11.10.

Response 45.11

The commenter expresses understanding of State housing requirements and why the County must comply. The commenter states that Forestville is being pushed beyond what the area can realistically support.

Please refer to Response 11.11.

Response 45.12

The commenter urges that the County choose the alternative where all six parcels in Forestville are not rezoned. The commenter asks that the same consideration be given for any sites with hazardous histories.

Please refer to Response 11.12.

Response 45.13

The commenter asks that the County avoid considering sites FOR-1, FOR-2, FOR-3, FOR-4, FOR-5, and FOR-6 at minimum. The commenter asks that the County find other sites where future residents will have adequate commercial services, better roads, and the least amount of impacts to the environment.

Please refer to Response 11.13.

EIR Public Comment 46

COMMENTER: Durs Koening

DATE: February 3, 2023

Response 46.1

The commenter states they are a Forestville resident. The commenter states that increasing Forestville's population by 1,652, as shown on page 2-26 of the Draft EIR, is ill-advised.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites, and Master Response SITE for additional information on the Rezoning Site selection process.

Response 46.2

The commenter states that while they support affordable housing, straining the roads and services by a significant amount will diminish Forestville's character.

This comment has been noted. Please refer to Master Response EXST. Please refer to Section 4.16, *Transportation*, for a full analysis of impacts to transportation induced by the proposed project. As stated therein, while individual VMT would increase, the implementation of Mitigation Measure TRA-1 will reduce overall VMT through various trip reduction programs such as, but not limited to, bicycle programs, bus service enhancements, and carpool programs. Please refer to Section 4.15, *Public Services and Recreation*, for more information on the impacts to existing services. While the proposed project will introduce an increased demand for services, impacts to fire protection facilities, police protection facilities, schools, parks, and other public facilities would be less than significant. In addition, please refer to Master Response UTIL for information regarding impacts to the existing sewer system and Section 4.18, *Utilities and Service Systems*, for additional information on impacts to various utility systems. As stated therein, impacts to stormwater drainage, electric power, natural gas, telecommunications, and solid waste would all be less than significant. Impacts to water supply would be mitigated to a less than significant level.

Response 46.3

The commenter expresses concern regarding traffic and existing police service availability. The commenter states that residents do not want more traffic, vibration, and that existing police services that are provided by the County Sheriffs Department have very few patrols in the West County.

This comment has been noted. Please refer to Master Response EXST for concerns regarding the existing conditions of services and infrastructure.

Regarding the commenter's concern on traffic, please refer to Section 4.16, *Transportation,* of the Draft EIR. As stated under Impact TRA-1 starting on page 4.16-14, average total home-based vehicle miles travelled (VMT) per resident would decrease minimally with implementation of the project. However, VMT per resident would be 16.0, above the threshold value of 13.0. For this reason, Mitigation Measure TRA-1 will be implemented aiming to reduce overall VMT through various trip reduction programs such as, but not limited to, bicycle programs, bus service enhancements, and carpool programs.

Regarding vibration, please refer to Section 4.13, *Noise,* of the Draft EIR. As discussed under Impact NOI-1 beginning on page 4.13-14, vibration would be a concern during the construction phase of a

development facilitated by the project on Rezoning Sites. Implementation of Mitigation Measures NOI-2 through NOI-4 would be implemented to reduce construction vibration impacts to a less than significant level. As discussed on page 4.13-22, development facilitated by the project on Rezoning Sites would not involve substantial vibration sources. Operational impacts to vibration would be less than significant.

In addition, please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. As shown on page 4.15-12 and 4.15-13, the need for new officers would be distributed throughout the County, with no more than three new officers required at any one station. Therefore, it is not anticipated that the construction of a new police station would be required to serve development on any of the sites. However, General Plan Policy LU-4f requires the payment of fair share impact fees during the building permit process, which fund the provision of public services, including police protection services, based on projected growth. Impacts to police service would be less than significant.

EIR Public Comment 47

COMMENTER: Geary Do

DATE: February 3, 2023

Response 47.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 47.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 47.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 47.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 47.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 47.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 47.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 48

COMMENTER: Mary Helt

DATE: February 3, 2023

Response 48.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 48.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 48.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 48.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 48.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 48.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 48.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 49

COMMENTER: Roberta Schepps

DATE: February 3, 2023

Response 49.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 49.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 49.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 49.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 49.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 49.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 49.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 50

COMMENTER: Stacie Gradney

DATE: February 3, 2023

Response 50.1

The commenter states that rezoning in Forestville is not realistic. The commenter asks how the County plans to build at the Vector Unit considering the sites hazardous conditions.

As determined in Section 4.9 of the Draft EIR, *Hazards and Hazardous Materials,* development within 0.25 mile of the sites identified in Table 4.9-2, including FOR-1, FOR-5, and FOR-6, would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board, the Sonoma County Local Oversight Program, or DTSC, before construction activities could begin. The agency responsible for oversight would determine the types of remediation and cleanup required and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells on site with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants. Development facilitated by the proposed project on Rezoning Sites would be required to comply with applicable regulations such as the California Health and Safety Code in order to reduce potential impacts to existing and future residents to a less than significant level.

Response 50.2

The commenter asks how the school will accommodate an increase in the number of students. The commenter states that the local high school was closed. The commenter asks if Analy can handle more students, and notes that the school is struggling to accommodate Forestville High School students and other students in the West County.

Please refer to Section 4.15, *Public Services and Recreation*, for a full analysis of the proposed project's impact to schools. As stated under Impact PS-3 beginning on page 4.15-13, existing laws would require future project applicant(s) of any development facilitated by the project on Rezoning Sites to pay school impact fees at the time building permits are issued. These fees are used by Sonoma County School Districts to mitigate impacts associated with long-term operation and maintenance of school facilities. The applicant's fees would be determined at the time of the building permit issuance and would reflect the most current fee amount requested by the applicable district. The payment of school developer fees is considered adequate mitigation of schools impacts under CEQA. Therefore, impacts to schools are considered less than significant without mitigation.

Response 50.3

The commenter suggests that a skate park should be built on one of the proposed rezone parcels or leaving the parcels as they are. The commenter expresses concern regarding decreased home values. The commenter states that there are other places in the County to accommodate new development.

This comment has been noted and passed onto decision-makers. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. In addition, please refer to the No Project Alternative located in Section 6, Alternatives, of the Draft EIR. As discussed therein, buildout of the Rezoning Sites under existing conditions would not accomplish the project's objectives to update

the General Plan's Housing Element in compliance with State-mandated housing requirements, including achieving the County's RHNA.

EIR Public Comment 51

COMMENTER: Synde Acks

DATE: February 3, 2023

Response 51.1

The commenter states that an increase in density in Forestville and Guerneville will overwhelm the town and cause hardships.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and Rezoning Site selection.

Response 51.2

The commenter expresses concerns of the cumulative impacts of new residents on top of the influx of tourists seen in the summer. The commenter states that the regional parks are overused and this causes a threat to wildlife. The commenter states that the Russian River is experiencing high toxicity levels.

This comment has been noted. Please refer to Master Response EXST concerning the existing conditions of services and infrastructure.

Please refer to Section 4.15, *Public Services and Recreation,* Impact PS-2 beginning on page 4.15-12. As discussed therein, the proposed project will not have an adverse impact on police facilities or impact service ratio response times. Impacts would be less than significant.

Regarding the commenter's concern about toxicity of the Russian River, please refer to Table 4.10-3 in Section 4.10, Hydrology, which discusses the impairments to water bodies near the rezone sites, including impairments to the Russian River.

Response 51.3

The commenter expresses concerns regarding existing police and fire department services. The commenter expresses concerns regarding emergency access and response times.

Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. As discussed under Impact PS-1 starting on page 4.15-10, local fire districts are all meeting the National Fire Protection Association response time goals for rural and suburban areas. The Rezoning Sites themselves are all within 1.5 miles of the nearest fire station, and emergencies on these sites would be responded to within the response time goals. In addition, if the County requires the expansion of fire department facilities, General Plan Policy PS-3m requires the consideration of payment of impact fees to ensure fire departments are adequately funded to serve new projects, and Sonoma Valley Fire District and Sonoma County Fire District adopted impact fees in 2021 that are collected for the purpose of mitigating impacts caused by new development on each district's infrastructure. Fees are used to finance the acquisition, construction and improvement of public facilities needed as a result of this new development. Therefore, impacts regarding fire service response times and facilities were determined to be less than significant. Please refer to the footnotes in Table 4.15-5 on page 4.15-11 of the Draft EIR, where the consolidation of individual fire departments is described. These consolidations do not modify the analysis provided in the Draft EIR.

As described under Impact PS-2 beginning on page 4.15-12, the need for new police officers would be distributed throughout the County, with no more than three new officers required at any one station.

Therefore, it is not anticipated that the construction of a new sheriff station would be required to serve development on any of the sites. Therefore, impacts to police services were determined to be less than significant.

Please also refer to Master Response EMG regarding emergency access.

Response 51.4

The commenter expresses concerns regarding flooding in Forestville and emergency evacuation in the event of a flood.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation and Master Response EXST regarding existing conditions.

Please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR. As stated therein, development facilitated by the project would alter the existing drainage patterns in the Rezoning Sites through introduction of new impervious surfaces and infrastructure. However, the Sonoma County General Plan includes goals and policies that are intended to reduce flood hazards through minimal alterations to designated floodplains, which would reduce the potential for increased susceptibility to flooding on or off site.

Implementation of these goals and policies would ensure that the runoff from development facilitated by the project on Rezoning Sites does not exceed the capacity of existing and future storm drain systems. The project would not alter the existing drainage patterns or contribute runoff water in a manner which would result in substantial erosion, siltation, or flooding, nor would it exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

Response 51.5

The commenter describes the financial, emotional, and physical hardships faced by low-income people in their community when floods occur. The commenter states that utilities and services are limited during these events, creating additional difficulties particularly for low-income individuals.

This comment has been noted and passed onto decision-makers. Please refer to Master Response EMG regarding emergency evacuation and Master Response EXST regarding existing conditions.

Response 51.6

The commenter asks if areas such as Petaluma or Rohnert Park would be good alternative locations for Rezoning Sites to address the concerns raised by the commenter.

This comment has been noted and passed onto decision-makers for consideration. Please refer to Master Response SITE for information regarding the Rezoning Site selection process.

Response 51.7

The commenter expresses care for their community and requests that the County not exacerbate the issues the commenter raised in the letter. The commenter hopes to find a solution.

This comment has been noted and passed into decision-makers for consideration.

EIR Public Comment 52

COMMENTER: Linda Hunter

DATE: February 4, 2023

Response 52.1

The commenter states that the proposed number of units in Guerneville would require new roads, infrastructure, dear lines, water sources, and introduce issues regarding floods and wildfire.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Impacts to new roads and infrastructure is addressed in the EIR in Section 4.16, *Transportation*. Water sources are discussed in Section 4.18, *Utilities and service Systems*. Flood Hazards are discussed in Section 4.10, *Hydrology and Water Quality*, and Wildfire is addressed in Section 4.19, *Wildfire*.

Response 52.2

The commenter asks that other areas are considered for housing development. The commenter states that future development would impact property values for existing homes.

This comment has been noted. Please refer to Master Response SITE in regard to the Rezoning Site selection process. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes property values.

EIR Public Comment 53

COMMENTER: Lynn Wooley

DATE: February 4, 2023

Response 53.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 53.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 53.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 53.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 53.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to response 14.5.

Response 53.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to response 14.6.

Response 53.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to response 14.7.

EIR Public Comment 54

COMMENTER: Lynn Woolley

DATE: February 4, 2023

Response 54.1

The commenter asks that the County provide them with updates pertaining to the Sonoma County Housing Element.

This comment has been noted. The County has added the commenter to the mailing list for notices related to this project. Please refer to the Permit Sonoma website for updates on the Housing Element. The site may be accessed at the following link:

https://permitsonoma.org/longrangeplans/proposedlong-rangeplans/housingelement

EIR Public Comment 55

COMMENTER: Michael Gomez

DATE: February 4, 2023

Response 55.1

The commenter expresses opposition to sites AGU-1 and AGU-2 given that both sites have existing development constraints. The commenter states that Sonoma Sewer and Water installed a sewer easement across their property. The commenter states that the change in zoning to the sites would impact their single-family home use and sees this as the County's first step to taking their property.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites.

Response 55.2

The commenter states that sites AGU-1 and AGU-2 are bordered by Sonoma Creek to the west and Lily Creek to the east which require riparian setbacks and reducing use of the properties.

The commenter is correct that the existing zoning for AGU-1 and AGU-2 includes the Riparian Corridor (RC) Combining Zone, specifically RC50 which indicates a 50-foot setback from riparian areas. Site-specific development proposals would be required to conform to this setback.

Response 55.3

The commenter states that AGU-1 and AGU-2 are not needed as Boyes Springs is already building new housing. The commenter states that the proposed rezoning is not good for the land, surrounding neighborhood, or environment. The commenter states that they are feeling pressure that they may have to give up their property.

Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites and the need for the project to meet the County's RHNA.

EIR Public Comment 56

COMMENTER: Olga Gishizky

DATE: February 4, 2023

Response 56.1

The commenter states that new development will lead to unsustainable use of groundwater.

Please refer to Impact HWQ-2 on pages 4.10-25 and 4.10-26 and Impact HWQ-6 on page 4.10-29 of Section 4.10, *Hydrology and Water Quality,* of the Draft EIR. As stated therein, policies under General Plan Goal WR-4 encourage water conservation, which would decrease the project's demand on water throughout the County and therefore decrease the demand on local groundwater supplies. Additionally, compliance with the LID Manual, implementation of permanent stormwater BMPs that encourage groundwater recharge, compliance with General Plan Policy WR-2e, and compliance with all applicable policies under General Plan Goal WR- 4 would ensure that development facilitated by implementation of the proposed project on Rezoning Sites would not interfere with sustainable groundwater management planning efforts. Compliance with these existing requirements would ensure that impacts to groundwater supplies would be less than significant.

Response 56.2

The commenter states that creating urban sprawl in unincorporated West County, where traffic accidents cause fatalities, is not "environmentally" friendly.

Please refer to Master Response EXST and Section 5, *Other CEQA Required Discussions,* on pages 5-1 through 5-5 in the Draft EIR. As stated therein, the proposed project does not involve expansion of existing urban service areas and population growth related to the proposed project would not result in significant long-term physical environmental effects.

Response 56.3

The commenter states that air pollution and noise from cars and radios will be exacerbated with increased population density and believes that violence will occur.

Please refer to Master Response EXST regarding existing conditions. Please refer to Section 4.13, *Noise*, of the Draft EIR for a full analysis of noise impacts induced by the project. As shown therein, the proposed project will have some impacts to noise. However, compliance with applicable noise regulations and implementation of the mitigation measures will reduce noise impacts to a less than significant level. Please refer to Section 4.3, *Air Quality,* of the Draft EIR for a full analysis of air quality impacts. As stated therein, air quality impacts related to VMT would not conflict with BAAQMD's 2017 CEQA Air Quality Guidelines and would be consistent with the 2017 Clean Air Plan. Therefore, air quality impacts related to increased vehicle trips are less than significant.

Regarding the suggestion that increased noise will lead to violence within the community, the commenter has not substantiated this claim with evidence. Additionally, as discussed in Section 4.15, *Public Services and Recreation,* in the Draft EIR, the proposed project would not have significant environmental impacts related to the construction of new police facilities as no new facilities would be required. The project would require the addition of 12 officers to the Sonoma County Sheriff's Department to maintain current service ratios, however this addition would not necessitate the construction of new police facilities. This comment has been noted.

Response 56.4

The commenter states that the needed infrastructure to support future population growth will negatively impact the quality of life and rural aesthetic of Forestville.

This comment has been noted. Please refer to Master Response EXST regarding existing conditions and Master Response UTIL regarding the availability of utilities. Please refer to Section 4.1, *Aesthetics,* in the Draft EIR for a full analysis of aesthetic impacts. As stated therein, there would be significant impacts on community aesthetic character with rezoning of sites FOR-1 through FOR-6. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes quality of life.

Response 56.5

The commenter expresses concerns regarding existing limited parking on River Drive and states that increased populations needing to park on this road will lead to potential conflicts between residents.

This comment has been noted. Parking is not a required topic under CEQA and thus, was not included in the transportation analysis of the Draft EIR. Parking will be evaluated at the project-specific level when development proposals are received. Please refer to Master Response EXST regarding existing conditions.

Response 56.6

The commenter suggests that the County reopen Cooks Campground, assist Burkes Canoe to divert river floaters from swimming upstream disturbing waterfront residents and wildlife, and have rangers patrol the river between Forestville to Guerneville to keep the peace between river users.

This comment is not relevant to the environmental impact analysis presented in the Draft EIR. This comment has been noted and passed onto decision-makers.

Response 56.7

The commenter states that urban sprawl is not healthy and the community would be pushed beyond capacity.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites. Additionally, please refer to Section 5, *Other CEQA Required Discussions,* on pages 5-1 through 5-5 in the Draft EIR. As stated therein, the proposed project does not involve expansion of existing urban service areas and population growth related to the proposed project would not result in significant long-term physical environmental effects.

EIR Public Comment 57

COMMENTER: Patrick Reesink

DATE: February 4, 2023

Response 57.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 57.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 57.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 57.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 57.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 57.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 57.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 58

COMMENTER: Robin Bens

DATE: February 4, 2023

Response 58.1

The commenter expresses concern regarding the environmental impact on communities, particularly impacts to wetland, creeks, run-off, and natural habitat.

This comment has been noted. Please refer to Section 4.4, *Biological Resources,* of the Draft EIR for a full analysis of potential impacts to biological resources resulting from the proposed project including impacts to species habitat found in Impact BIO-1 starting on page 4.4-28, impacts to riparian habitats found in Impact BIO-2 starting on page 4.4-36, and impacts to wetlands found in Impact BIO-3 starting on page 4.4-37, other riparian resources, and habitats.

Response 58.2

The commenter expresses concerns regarding public safety.

This comment has been noted. Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR for additional information regarding police and fire service response times.

Response 58.3

The commenter expresses concerns regarding transportation and limited County bus services in Forestville.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Additionally, please refer to Section 4.16, *Transportation*, which includes discussion of impacts to the transit system starting on page 4.16-14. As stated therein, the project would not result in adverse impacts to fixed-route service. Furthermore, development facilitated by the project on Rezoning Sites would not conflict with plans, policies, ordinances, or regulations pertaining to public transit, and increased ridership is not expected to exceed available transit capacities.

Response 58.4

The commenter expresses concern regarding increased traffic in Forestville.

As shown in Appendix TRA of the Draft EIR, traffic volumes in Forestville were calculated for one intersection: State Route 116/Mirabel Road, for informational purposes. Regarding traffic congestion, please refer to Master Response TRA for an explanation as to why traffic congestion is no longer evaluated as part of CEQA. Instead, a VMT analysis is included starting on page 4.16-14 of the Draft EIR which finds that VMT impacts would be significant and unavoidable.

Response 58.5

The commenter states there is only one gas station in town.

This comment is noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 58.6

The commenter expresses concern regarding potential overcrowding of the local schools.

Please refer to Section 4.15, *Public Services and Recreation*, for a full analysis of the proposed project's impact to schools. As noted in Table 4.15-2 on page 4.15-3 of the Draft EIR El Molino High School was not included in the analysis and West Sonoma County Union High School is identified as serving the Forestville sites. Additionally, as stated under Impact PS-3 beginning on page 4.15-13, existing laws would require future project applicant(s) of any development facilitated by the project on Rezoning Sites to pay school impact fees at the time building permits are issued. These fees are used by Sonoma County School Districts to mitigate impacts associated with long-term operation and maintenance of school facilities. The applicant's fees would be determined at the time of the building permit issuance and would reflect the most current fee amount requested by the applicable district. The payment of school developer fees is considered adequate mitigation of schools impacts under CEQA. Therefore, impacts to schools are considered less than significant without mitigation.

Response 58.7

The commenter expresses concern regarding parking in Forestville.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

Response 58.8

The commenter expresses concern regarding the water and sewer systems. The commenter states residents will become overtaxed.

This comment has been noted. Please refer to Master Response UTIL for information regarding the existing sewer system. Additionally, please refer to Section 4.18, *Utilities and Service Systems,* in the Draft EIR. As stated therein, impacts related to water demand would be significant for sites GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4 due to the lack of existing water infrastructure directly adjacent to these sites. Wastewater impacts would be significant for sites GEY-1, LAR-7, FOR-1, FOR-2, FOR-6, GRA-4, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4 due to lack of existing wastewater infrastructure adjacent to these sites. Development on these sites would be required to comply with Mitigation Measure UTIL-1 as described on page 4.18-16 of the Draft EIR, which requires documentation that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary improvements to serve a Rezoning Site will be made prior to occupancy. Water and wastewater impacts could not be adequately determined for sites GEY-1 through GEY-4 and therefore impacts resulting from development on these sites would be significant and unavoidable.

Response 58.9

The commenter states there are no proper grocery stores in the area and the single market in the area will become overburdened.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 58.10

The commenter expresses concerns regarding the lack of sidewalks and crosswalks in Forestville.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Section 4.18, *Transportation*, of the Draft EIR. As stated on page 4.16-18, the General Plan has several policies that require that design of future development prioritizes pedestrian safety and traffic safety. Compliance with these policies would ensure the proposed project has a less than significant impact.

Response 58.11

The commenter states that limits on upzoning for recreational vehicle parking and accessory dwelling units will need to be addressed.

This comment is not relevant to the environmental impact analysis of the proposed project. This comment has been noted and passed onto decision-makers.

For a full analysis of alternatives to the proposed project, please refer to Section 6, *Alternatives,* of the Draft EIR. In addition, as noted on page 2-25, accessory dwelling units (ADUs) are exempt under CEQA and are consistent with the General Plan and zoning as provided in state law, including density.

Response 58.12

The commenter expresses opposition to the potential volume of future development in Forestville.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites. Please refer to Master Response SITE for information regarding how Rezoning Sites were selected.

EIR Public Comment 59

COMMENTER: Sandra Reilly

DATE: February 3, 2023

Response 59.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 59.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 59.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 59.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 59.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 59.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 59.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 60

COMMENTER: Patricia Kremer

DATE: February 5, 2023

Response 60.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 60.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 60.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 60.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 60.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 60.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 60.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 61

COMMENTER: Patti Sinclair

DATE: **February 5, 2023**

Response 61.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 61.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 61.3

The commenter states that increased traffic on Laughlin Road would further deteriorate existing roads and cause traffic congestion during the school year. The commenter states that the left and right from Laughlin Road to Armstrong Woods Road will also cause traffic delays.

This comment is noted. Please refer to Section 4.16, *Transportation,* of the Draft EIR for a full analysis of potential impacts to transportation. Please refer to Master Response TRA regarding traffic congestion.

However, please refer to Appendix TRA of the Draft EIR. Three intersections were studied in relation to the Rezoning Sites located in Guerneville: River Road (SR 116)/Armstrong Woods Road-First Street, River Road/Gravenstein Highway (SR 116), and Front Street (SR 116)/Mirabel Road. Both the River Road (SR 116) Armstrong Woods Road-First Street and River Road/Gravenstein Highway (SR 116) intersections maintain an acceptable level of service (LOS) A. Traffic at these intersections does increase to LOS B under cumulative conditions. However, LOS B does not exceed the County requirements of LOS D.

Front Street (SR 116)/Mirabel Road is a case where development at Rezoning Sites GUE-1 through GUE-4 results in a new deficiency. However, since all of the development is not anticipated to be built in the near-term, no near-term intersection improvements have been identified as required.

Please also refer to Master Response EXST regarding existing conditions of infrastructure. Roadways in the area would be subject to increased use through construction and residential traffic, which could result in accelerated deterioration. The County collects countywide traffic development fees pursuant to Article 98 of Chapter 26 of the Sonoma County Code. The payment of these fees by each individual project would alleviate cumulative roadway deterioration impacts to the regional road network.

Response 61.4

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages. The commenter states that upgrades to the sewer system will increase the sewer taxes of the residents.

Please refer to Response 14.3. Please refer to Master Response UTIL. In addition, please refer to Section 4.18, *Utilities and Services Systems,* of the Draft EIR. As stated on page 4.18-14, each wastewater service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide wastewater service to the Rezoning Sites. With the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites would have access to adequate wastewater service. Water and sewer districts charge connection fees and monthly usage fees, which are intended to cover the necessary improvements needed to serve a project site. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes property taxes. Please refer to Response 14.3.

Response 61.5

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 61.6

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 61.7

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 61.8

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 62

COMMENTER: Robert Grandmaison

DATE: February 5, 2023

Response 62.1

The commenter states that they have lived near the site located at 14156 Sunset Avenue for over 30 years, and while they see the need for affordable housing, they are opposed to the proposed density at this site.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element and Rezoning Sites.

Response 62.2

The commenter states that the roadways in the area are narrow and lack sidewalks, driveway curb cuts, accessibility cuts, and gutters.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 62.3

The commenter expresses concern regarding emergency vehicle access stating that emergency vehicles are often blocked due to parked cars, and this this can lead to life endangering conditions.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation site access and Master Response EXST regarding existing conditions.

Response 62.4

The commenter states that it is currently challenging to find parking in the area, especially when summer visitors stay in rental properties surrounding the site.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please also note that the availability of parking is not an issue area evaluated by CEQA. As new development is proposed, each project will undergo individual evaluation to determine the needs of the site, including provisions for parking.

Response 62.5

The commenter states that delivery trucks occasionally refuse to make deliveries on Sunset Avenue and other nearby streets due to the narrowness and slopes of the roadways.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 62.6

The commenter states that there are no sidewalks or gutters in the vicinity of the site. The commenter states that future residents will be forced to utilize uneven pavements.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Section 4.16, *Transportation,* of the Draft EIR. As discussed on page 4.16-15, development facilitated by the project on Rezoning Sites would propose no features that would be hazardous to pedestrians, such as inadequate site distance from driveways or increased vehicle speeds in high pedestrian use areas, nor is it forecast to generate pedestrian demand that would exceed the capacity of the area's pedestrian network. In addition, in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations.

Response 62.7

The commenter states that lighting in the area is bad and that the existing tree canopy in the area blocks out light needed for safe pedestrian use.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 62.8

The commenter asks that the project at this site not be allowed to move forward with development. The commenter suggests that there are better areas to support an increase in density and offer more opportunities for public participation.

This comment has been noted and passed onto decision-makers. Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites.

EIR Public Comment 63

COMMENTER: Susan Ament

DATE: February 5, 2023

Response 63.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 63.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 63.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 63.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 63.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 63.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 63.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 64

COMMENTER: Janice Stenger

DATE: February 6, 2023

Response 64.1

The commenter asks if the community is expected to accommodate an additional 500 future residents and shares concern regarding the quality of life impacted by a population increase. The commenter expresses concern regarding the road safety. The commenter expresses concern regarding biological resources and asks if redwood trees will be removed and whether animals in the surrounding apple orchard continue to be able to rest in the orchard.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Please note that quality of life is not an issue area evaluated under CEQA. In regard to road safety, please refer to Section 4.16, *Transportation,* page 4.16-18 of the Draft EIR. As discussed therein, development facilitated by the proposed project on Rezoning Sites would not substantially increase hazards due to a design feature such as sharp curves or dangerous intersections. Additionally, General Plan policies CT-2w, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety, and future development would be required to comply with these policies, where applicable.

Please refer to Master Response TRA regarding traffic congestion.

Please refer to Section 4.4, *Biological Resources,* of the Draft EIR. Under Impact BIO-1 starting on page 4.4-28, it is stated that projects that would result in ground disturbance through clearing/grading or vegetation trimming or removal, a project-specific biological assessment would be required through the implementation of Mitigation Measure BIO-1. Additional mitigation measures would then be required based on the result of the project-specific biological analysis and may include one or more of the additional mitigation measures (Mitigation Measure BIO-2 through Mitigation Measure BIO-12) to reduce impacts to a less than significant level. In addition, as discussed on page 4.4-39, the Sonoma County Zoning Code Chapter 26D and Sonoma County Zoning Code Article 88, Section 26-88-010(m), *Tree Protection Ordinance*, provide for the protection of heritage and landmark trees. Article 67, *Valley Oak Habitat Combining District*, of the Sonoma County Zoning Code provides protection for oak woodland habitats.

Response 64.2

The commenter asks if it's true that if there are state or federal funds used for future development, the units can't be provided to locals only or people who are returning to the area that were born there. The commenter asks if this would be due to the cost of housing. The commenter asks if it would be true that future development would be for people from any state in the country or other counties in the state.

This comment is not relevant to the environmental impact analysis of the proposed project. The cost of housing and future residents who may reside in new developments is not determined through CEQA. Restricting who may potentially reside in future developments based on past or existing connection to the county would be a violation of the Fair Housing Act.

Response 64.3

The commenter states that Fife Commons was not reserved for existing or local residents only and was opened to the general public. The commenter asks if future development will be utilized for local residents.

This comment has been noted. Please refer to Response 64.2.

Response 64.4

The commenter notes that Guerneville has been the least expensive location in the County to live. The commenter states there are no year-round jobs in the area. The commenter asks if it is California's job to provide homes for everyone who would like to live in the area. The commenter asks where this is promised in the Constitution.

This comment has been noted. Please refer to Response 64.2 regarding who may move into future developments. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Regarding the commenter's concerns about the Constitution, this comment is not relevant to the environmental impact analysis for the proposed project and no response is required.

Response 64.5

The commenter notes that there is ample discussion regarding food deserts. The commenter asks if West County is considered a food desert since it only has one market from Hacienda to the coast. The commenter asks if developers can get a "pass" and build higher cost housing or a trailer park. The commenter states that the Draft EIR violates the objectives of the General Plan and asks if it is now considered defunct. The commenter states that the Draft EIR assumes it knows better than Cal Fire, LAFCO, and other state agencies. The commenter compares the proposed project to the history of the 13 colonies fighting against the British due to taxation without representation.

This comment is noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

The cost of housing is not determined through CEQA. Regarding the question of whether or not a trailer park may be developed, development would be based on site-specifical proposals or development applications received after rezoning takes place.

The commenter states that the Draft EIR violates the objectives of the General Plan and asks if it is now considered defunct.

Please refer to Section 4.11, *Land Use and Planning,* of the Draft EIR for a full analysis on project consistency. Please refer to Section 4.11, *Land Use and Planning,* of the Draft EIR for a full analysis on project consistency with the County General Plan. As shown therein, the proposed project is consistent with the majority of General Plan policies.

EIR Public Comment 65

COMMENTER: John Ryan

DATE: February 6, 2023

Response 65.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 65.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 65.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 65.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 65.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 65.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 65.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 66

COMMENTER: Kenneth Billheimer

DATE: February 6, 2023

Response 66.1

The commenter states that they are a resident of Guerneville and are located near a rezone site located on Sunset Drive. The commenter expresses opposition to future development uphill from Woodland Drive. The commenter expresses concerns regarding road safety in the area, stating that the streets are narrow, vehicles regularly exceeded posted speed limits, and developments would require cars to make sharp turns that could result in an accident.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Master Response TRA regarding traffic congestion from trip generation. It is speculative to presume that trips generated by the proposed project would result in speed limit exceedances or unsafe driving.

Regarding road safety, please refer to Impact TRA-2 on page 4.16-18 of the Draft EIR. As discussed therein, development facilitated by the proposed project on Rezoning Sites would not substantially increase hazards due to a design feature such as sharp curves or dangerous intersections. Additionally, General Plan policies CT-2w, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety, and future development would be required to comply with these policies, where applicable. Roads would be required to comply with any road width standards and other road design standards present within the County Code.

Response 66.2

The commenter notes recent evacuations due to wildfires. The commenter states that in an evacuation, it is difficult to take Morningside Drive to Highway 116 as Morningside Drive is a narrow one-way road where no two cars can pass. The commenter expresses concern that an increase in population could exacerbate dangerous evacuation conditions.

This comment has been noted. Please refer to Master Response FIRE and Master Response EMG regarding the risk of wildfire and concerns about emergency evacuation.

Response 66.3

The commenter suggests that housing should be built in other areas of Sonoma County where non-seasonal jobs are available and there is existing infrastructure to support new development. The commenter expresses concerns regarding the difficult to access necessary services in the area.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites, and Master Response SITE for information on the Rezoning Site selection process. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

EIR Public Comment 67

COMMENTER: Maggie Mayo

DATE: February 6, 2023

Response 67.1

The commenter states that their comments are in regard to sites SON-1 and SON-4. The commenter asks if there has been an analysis on the impact of future development on future land use and existing well water.

Please refer to Section 4.11 of the Draft EIR, *Land Use and Planning,* for an analysis on land use and Section 4.18, *Utilities and Service Systems*, for an analysis of the projects impacts on water supply availability.

In addition, please refer to Section 4.10, *Hydrology and Water Quality,* of the Draft EIR for additional information on existing groundwater supplies. As discussed on page 4.10-25, General Plan Policy WR-2e, development in Class 3 water areas (i.e., marginal groundwater areas), which includes Larkfield and Glen Ellen Rezoning Sites) would be required to establish adequate groundwater quality and quantity prior to development. However, Policy WR-2e would only apply if development facilitated by the project on the Rezoning Sites would be served by a private on-site well.

Response 67.2

The commenter asks how sites SON-1 and SON-4 qualify under Government Code Section 65913.5. The commenter asks if these sites are considered to be in a "transit-rich area" or "urban infill site." The commenter asks how the Sonoma Rental Housing Opportunity Area Program may double parcel density from 10 units, as defined in the Government Code.

This comment has been noted. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria used to select sites.

As discussed under Section 2.6 on page 2-5 of the Draft EIR, the Housing Element includes a program for rezoning under SB 10 which allows local governments to increase residential density up to 10 dwelling units per parcel on eligible parcels on a transit-rich or urban infill site. However, the SB 10 rezoning program under the Housing Element would constitute a future action and would not occur on any Rezoning Sites that are rezoned by the Board of Supervisors to be included in the Housing Element Inventory.

The proposed project falls under Government Code Section 65915, rather than Government Code Section 65913.5 as the commenter suggests. Please refer to Section 2.6.5, beginning on page 2-23 of the Draft EIR for a description of the potential buildout on the proposed Rezoning Sites. In addition, the project aims to be consistent with General Plan Policy HE-3i. As described on page 4.11-39 of the Draft EIR, to the extent feasible, the Rezoning Sites are located within Urban Service Areas, with adequate water and sewer supplies (Section 4.18, *Utilities and Service Systems*, with implementation of Mitigation Measure UTIL-1), near transit (Section 4.16, *Transportation*), near neighborhood-serving commercial uses (most Rezoning Sites are near commercial areas, with the exception of GUE-2, GUE-3, GUE-4, and AGU-3), near schools (Section 4.15, *Public Services and Recreation*), and at safe distances from major roadways (Section 4.3, *Air Quality*). Thus, the proposed project fulfills the requirements established by Government Code 65915.

Response 67.3

The commenter asks if there are requirements to maintain a specific amount of open space and what those requirements are.

Please refer to Section 4.15, *Public Services and Recreation,* in the Draft EIR. Requirements pertaining to park space may be found under Impact PS-4 beginning on page 4.15-15. As stated therein, the County requires payment of development fees to fund park facilities (per Sonoma County Code Section 20-65) and requires parkland dedication or payment of in lieu fees for residential subdivision projects per Sonoma County Code Sec. 25-58 and 25-58.1, offsetting any impacts related to increased demand at existing recreation facilities, and project applicant(s) of the Rezoning Sites would be required to pay this during the permit approval process.

As noted in Section 2, *Project Description,* on pages 2-25 and 2-26 of the Draft EIR, the project proposes to amend the General Plan land use for Rezoning Sites SON-1 and SON-4 to UR 10, and proposes to rezone these sites to R3. Open space requirements for multi-family housing such as housing in the R3 zone are outlined in the Sonoma County Zoning Code Section 26-08-050 (I).

Response 67.4

The commenter asks if there will be limitations on building heights.

Restrictions on height, setbacks, and floor-area ratio, where appropriate, would follow the applicable R3 zoning requirements outlined in section 28-08-040 and -050 of the Sonoma County Zoning Code.

EIR Public Comment 68

COMMENTER: Patricia Kremer

DATE: February 6, 2023

Response 68.1

The commenter states that the community near Laughlin Road and Cutten Drive opposes the rezoning of sites GUE-2, GUE-3, and GUE-4. The commenter states that the proposed project would negatively impact roads, traffic conditions, water, sewer, redwood trees, and emergency egress for residents.

This comment is noted. Refer to Master Response SITE regarding the site selection process, Master Response HE regarding opposition to the project, Master Response EMG regarding emergency access, Master Response UTIL regarding water and sewer utilities, and Response 90.4 regarding roads and traffic conditions.

Response 68.2

The commenter states that residents in the area purchased their properties to be in an R1 zoning area. The commenter suggests there may be more suitable areas for future affordable housing development with better access.

This comment is noted. Refer to Master Response SITE regarding the site selection process and Master Response HE regarding opposition to the project.

EIR Public Comment 69

COMMENTER: Stacie Gradney

DATE: February 6, 2023

Response 69.1

The commenter states that Forestville is not a town fit for an increase in population due to potential development resulting from zoning changes. The commenter suggests that the County increase public participation. The commenter includes several pages of screenshots from the Next Door app that include the opinions of other residents.

The commenter's opposition to the project is noted and will be passed on to decision-makers. Refer to Master Response HE regarding opposition to the project.

EIR Public Comment 70

COMMENTER: Vicki A. Hill

DATE: February 6, 2023

Response 70.1

The commenter expresses an opinion that sites in Glen Ellen should not be rezoned, and suggests that previous comments regarding properties in Glen Ellen were not considered in preparing the EIR. The commenter opines that the proposed high-density zoning district is out of scale. The commenter requests the Glen Ellen sites be removed from the project or an alternative zone be considered.

Please refer to Master Response SITE, *Master Response* EXST: Existing Conditions

Commenters expressed concern regarding existing environmental conditions, hazards, utilities, and general infrastructure availability. Commenters highlighted many of the existing conditions of the County and its ability to adequately support housing and population growth. Commenters state general conditions regarding sites in the County.

The commenters refer to existing conditions within the County and perceived issues with the above referenced areas, such as concerns regarding existing traffic congestion and natural hazards (e.g., existing wildfire and flood risks). The Draft EIR includes a discussion of existing conditions related to individual impact areas and specific to *CEQA Guidelines* Appendix G questions. Individual impact areas include a discussion of the existing conditions which are then compared to the anticipated change induced by the project. While the concerns of the commenters regarding the issues listed above are noted, they are deemed to be adequately discussed in the Draft EIR. No revisions to the Draft EIR are necessary in response to this comment.

Master Response SITE: Site Selection, regarding the site selection process, and Master Response HE regarding opposition to the project. The commenter's opposition to rezoning sites in Glen Ellen is noted and will be passed on to decision-makers. Please refer to Response 70.2 through 70.33 for response to specific comments provided by the commenter.

Response 70.2

The commenter states there is no justification for including parcels in Glen Ellen and notes the Sonoma Developmental Center will result in new residents.

Refer to Master Response HE regarding opposition to the project and Master Response SITE regarding the site selection process. The project objectives, described in Section 2.7, *Project Objectives*, includes identifying sites to meet the County's State-required RHNA.

Response 70.3

The commenter claims the project would be inconsistent with the intent of the Glen Ellen Policies established in the General Plan and Glen Ellen Development and Design Guidelines.

Please refer to Impact AES-3, beginning on page 4.1-56 of the Draft EIR regarding potential impacts of rezoning and future development of the Rezoning Sites as it relates to visual character or quality. As described therein, sites GLE-1 and GLE-2 have a high site sensitivity where development would be dominant, and Mitigation Measure AES-1 for screening vegetation would be required. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on

Rezoning Sites cannot be made to comply with subjective design guidelines, projects on the 25 sites (including GLE-1 and GLE-2) may substantially degrade the existing visual character or quality of public views of the site and its surroundings. Thus, impacts would remain significant and unavoidable. However, as described in Section 4.1, *Aesthetics*, future development on Rezoning Sites GLE-1 and GLE-2 would be required to comply with the Glen Ellen Design Guidelines.

Response 70.4

The commenter claims the proposal involves out of scale high-density that would result in adverse impacts to Glen Ellen.

The commenter does not specify the types of adverse impacts being referred to; however, impacts resulting from the project were analyzed throughout the EIR. Refer to Response 70.3 regarding impacts relating to visual character.

Response 70.5

The commenter claims development on Glen Ellen parcels would significantly impact community aesthetic character or conflict with the Glen Ellen Development and Design Guidelines.

The EIR discloses significant and unavoidable impact under AES-3. Refer to Response 70.3. Additionally, the WH zone minimum is 16 units per acre, not 16 units per site.

Response 70.6

The commenter claims the cumulative impact analysis is flawed because it does not consider the Sonoma Developmental Center Specific Plan, the Hanna Center development, or the Elnoka Housing project. The commenter also says Arnold Drive cannot handle the level of traffic that will result, and there is no evidence these projects were considered for cumulative analysis for transportation, land use policy consistency, greenhouse gases, visual resources, public services, or wildfire evacuation and emergency response.

Please note that there was no formal application for a Hanna Boys Center project on file with the County at the time the NOP for this project was filed. A "Builder's Remedy" application for a Hanna Boys Center development was submitted on April 21, 2023. The baseline for analysis is typically set at the time the NOP is published, consistent with *CEQA Guidelines* Section 15125. The approach to the cumulative analysis did not require that cumulative development projects be listed in the EIR; therefore, no revisions to the EIR are necessary.

Please refer to the explanation provided under subheading *Cumulative Development* on page 4-2 of the Draft EIR. As stated therein:

> *CEQA Guidelines* Section 15130 provides the following direction relative to cumulative impact analysis and states that the following elements are necessary for an adequate discussion of environmental impacts:
>
> > A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

Therefore, the cumulative analysis approach in the Draft EIR is appropriate for the housing element program, and individual cumulative development projects need not be identified.

The Program EIR's approach to cumulative impact analysis is further described on page 4-2. As stated therein:

> …the transportation analysis considers the overall change in vehicle miles travelled (VMT) due to implementing several reasonably foreseeable development projects that would add to the Housing Element buildout. As such, the analysis in this EIR considers the cumulative impacts in the County from implementation of the Housing Element in its transportation analysis at the same time it considers the project level analysis because they are essentially one and the same. These cumulative VMT calculations are accounted for in the air quality, energy, greenhouse gas emissions, and noise analyses; therefore, these analyses would also be considered cumulative. Other impacts, such as geology and soils and cultural resources, are site specific and would not result in an overall cumulative impact from growth outside of the County.

Furthermore, the SDC Specific Plan EIR has been certified by the County Board of Supervisors; therefore, significant impacts related to this development were taken into consideration and mitigated as part of the approval process for that project. The SDC Specific Plan EIR included a description of the proposed rezonings now under consideration for the Housing Element.[2] Additionally, the Elnoka project is located within the City of Santa Rosa, and not near any of the Rezoning Sites. The project has a project EIR that analyzed impacts of the project.[3] Significant impacts were site-specific and would not be cumulatively considerable.

Response 70.7

The commenter states the EIR must consider consistency with adopted plans and policies, and claims that the existing General Plan contains LOS policies and standards the project would violate.

Please refer to Impact LU-2 of the Draft EIR, beginning on page 4.11-30. This impact discussion includes an analysis of consistency with the County General Plan, including with Policy LU-20gg, which requires an evaluation of traffic congestion (through metrics such as LOS), for new development in Glen Ellen. As stated on page 4.11-37, "Traffic congestion is not analyzed because it may not be considered a significant impact under CEQA." Appendix TRA of the Draft EIR provides an intersection operations analysis of study area intersections, which is provided for informational purposes, and is not required to satisfy CEQA. As described therein, no near-term congestion improvements would be necessary as a result of the project; however, fair share funding of cumulative scenario traffic congestion improvements would be necessary.

Response 70.8

The commenter states that the EIR does not consider sites might qualify for the addition of ADUs.

While the commenter is correct that the ADU ordinance allows the construction of ADUs, the maximum buildout of every parcel in the vicinity of the Rezoning Sites is not considered reasonably foreseeable development, unless project applications have been submitted to the County or other approving agency.

[2] Sonoma Developmental Center Specific Plan Draft Environmental Impact Report. SCH # 2022020222. August 2022. https://www.sdcspecificplan.com/documents.

[3] Elnoka Continuing CareRetirement Community (CCRC) Project Draft Environmental Impact Report. SCH # 2017072021. April 30, 2021. https://www.srcity.org/DocumentCenter/View/32194/Elnoka-CCRC-Draft-Environmental-Impact-DEIR.

Furthermore, as stated on page 2-25 of the Draft EIR, "accessory dwelling units are exempt under CEQA and are consistent with the General Plan and zoning as provided in state law, including density."

Response 70.9

The commenter quotes from the EIR and claims the Workforce Housing designation is incompatible with the Glen Ellen parcels.

Potential impacts from land use incompatibility are discussed in Section 4.11, *Land Use and Planning*.

Response 70.10

The commenter claims the proposed rezoning of Glen Ellen parcels are in conflict with project objectives that call for new housing in urban areas.

The commenter's opinion is noted and will be passed on to decision-makers.

Response 70.11

The commenter states the Glen Ellen parcels should be removed from consideration in Alternative 3.

Alternative 3: Fewer Rezoning Sites, was analyzed beginning on page 6-12 of the Draft EIR. This alternative would not rezone six Potential Sites determined to have greater than average environmental constraints (FOR-1, FOR-2, SON-1, SON-2, SON-3, and SON-4) as compared to the other 53 Rezoning Sites. In particular, these sites would require off-site infrastructure water and sewer improvements to serve future development (as identified in Mitigation Measure UTIL-1). GLE-1 and GLE-2 would not require these improvements, and is therefore not included in Alternative 3.

Response 70.12

The commenter asserts that the sites in Glen Ellen are not near an incorporated area or within an Urban Growth Boundary.

As shown in Figure 2-9 on page 2-17 of the Draft EIR, Sites GLE-1 and GLE-2 are within a designated Urban Service Area. Additionally, page 2-6 the Draft EIR has been revised for clarity, as there was a typographical error:

> All 59 Rezoning Sites are within General Plan-designated Urban Service Areas,[1] and, if near incorporated areas, within voter-approved Urban Growth Boundaries.[2]

Response 70.13

The commenter asks questions regarding the proposed zoning designations in the project description.

These comments do not relate to the adequacy of the EIR, but rather are comments on the project chosen for analysis. Please refer to Master Response HE regarding opposition to the project and Master Response SITE regarding the site selection process.

Response 70.14

The commenter states that the existing allowable units on the Glen Ellen sites is incorrect in Table 2-4, as there are 4 or 5 existing units.

Table 2-4 on page 2-23 of the Draft EIR provides the total allowable dwelling units under the current designation and not the actual built units on the Rezoning Sites.

Response 70.15

The commenter asks what the X values are on page 4-1.

This sentence has been deleted from the Draft EIR, and replaced with the following language:

> …As detailed in Section 2.6, *Project Characteristics*, these sites would be located within census-designated urbanized areas and urban service areas that are zoned R1 and located outside of both the high and very high fire hazard severity zones. The updated Housing Element also includes a program for rezoning under Senate Bill (SB) 10. Senate Bill 10 provides a streamlined process for local governments to increase residential density up to 10 dwelling units per parcel on eligible parcels, provided the parcel is qualifies under SB 10 as a transit-rich or urban infill site. The Housing Element proposes to allow sites within census-designated urbanized areas or urban clusters and urban service areas that are zoned R1 (Low-Density Residential) and located outside of both the High and Very High Fire Hazard Severity Zones to allow additional units based on parcel size. ~~Under the policy detailed in the Housing Element and allowed by SB 10, parcels that meet these criteria would be allowed to build a maximum of X du if they are between 10,000 square feet and 20,000 square feet in size, and a maximum of X du if they are above 20,000 square feet in size.~~ There are over 2,000 sites in unincorporated Sonoma County between 10,000 and 20,000 square feet in size that fit these criteria and 1,000 sites in unincorporated Sonoma County above 20,000 square feet in size that fit these criteria….

Response 70.16

The commenter states that the SDC Specific Plan, which has been approved, and Hanna Center development, which has been in the works since 2004, are reasonably foreseeable projects that should be analyzed as part of the cumulative impacts analysis.

Please refer to the explanation provided under subheading *Cumulative Development* on page 4-2 of the Draft EIR. As stated therein:

> *CEQA Guidelines* Section 15130 provides the following direction relative to cumulative impact analysis and states that the following elements are necessary for an adequate discussion of environmental impacts:
>
> > A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

Therefore, the cumulative analysis approach in the Draft EIR is appropriate for the housing element program, and individual cumulative development projects need not be identified.

Furthermore, the SDC Specific Plan EIR has been certified by the County Board of Supervisors; therefore, significant impacts related to this development were taken into consideration and mitigated as part of

the approval process for that project. The SDC Specific Plan EIR included a description of the proposed rezonings now under consideration for the Housing Element.[4]

Response 70.17

The commenter points out that Table 4.1-6 lists incorrect mitigation measures.

The commenter is correct. Table 4.1-6 has been revised as follows:

[4] Sonoma Developmental Center Specific Plan Draft Environmental Impact Report. SCH # 2022020222. August 2022. https://www.sdcspecificplan.com/documents.

Table 4.1-6 Site Impacts and Recommended Mitigation Summary

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
GEY-1	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
GEY-2	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
GEY-3	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
GEY-4	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
GUE-1	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
GUE-2	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
GUE-3	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
GUE-4	Moderate	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
LAR-1	Low	Co-Dominant	Less than significant	~~AES-1,~~ AES-2~~, AES-3, AES-4~~
LAR-2	Low	Co-Dominant	Less than significant	AES-2~~5~~
LAR-3	Low	Co-Dominant	Less than significant	AES-2~~5~~
LAR-4	Low	Co-Dominant	Less than significant	AES-2~~5~~
LAR-5	Low	Co-Dominant	Less than significant	AES-2~~5~~
LAR-6	Low	Co-Dominant	Less than significant	AES-2~~5~~
LAR-7	Moderate	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
LAR-8	Low	Co-Dominant	Less than significant	AES-2~~5~~
FOR-1	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
FOR-2	Moderate	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
FOR-3	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
FOR-4	Moderate	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
FOR-5	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
FOR-6	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
GRA-1	Low	Co-Dominant	Less than significant	AES-2~~5~~
GRA-2	Low	Co-Dominant	Less than significant	AES-2~~5~~
GRA-3	High	Co-Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
GRA-4	Moderate	Co-Dominant	Less than significant	AES-5

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
GRA-5	High	Co-Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
SAN-1	Low	Dominant	Significant	~~AES-1,~~ AES-2, AES-3, AES-4, AES-5
SAN-2	Low	Co-Dominant	Less than significant	AES-2~~5~~
SAN-3	Low	Dominant	Less than significant	AES-2~~5~~
SAN-4	Low	Co-Dominant	Less than significant	AES-2~~5~~
SAN-5	Low	Dominant	Less than significant	AES-2~~5~~
SAN-6	Low	Co-Dominant	Less than significant	AES-2~~5~~
SAN-7	Low	Co-Dominant	Less than significant	AES-2~~5~~
SAN-8	Low	Co-Dominant	Less than significant	AES-2~~5~~
SAN-9	Low	Co-Dominant	Less than significant	AES-2~~5~~
SAN-10	Low	Co-Dominant	Less than significant	AES-2~~5~~
GLE-1	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
GLE-2	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
AGU-1	Moderate	Co-Dominant	Less than significant	~~AES-1,~~ AES-2~~, AES-5~~
AGU-2	Moderate	Co-Dominant	Less than significant	~~AES-1,~~ AES-2~~, AES-5~~
AGU-3	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
PEN-1	High	Co-Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PEN-2	Moderate	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PEN-3	High	Co-Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PEN-4	Moderate	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PEN-5	High	Co-Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PEN-6	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
PEN-7	Moderate	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PEN-8	High	Co-Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PEN-9	High	Co-Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PET-1	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PET-2	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
PET-3	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PET-4	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
SON-1	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
SON-2	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
SON-3	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
SON-4	Moderate	Co-Dominant	Less than significant	AES-2~~5~~

*The potential impact statement listed in this table coincides with the impact evaluation decision matrix in the County's Visual Assessment Guidelines (2019) and does not apply to every CEQA issue for every site. Potentially significant impacts are indicated for specific sites and mitigation measures reiterated by CEQA issue area.

Response 70.18

The commenter asserts that Mitigation Measures AES-1 is infeasible for Glen Ellen sites, and suggests measures that limit building massing, staggered heights, building materials, and other design features.

As stated under the *Significance After Mitigation* subheading on page 4.1-57, development cannot be made to comply with subjective design guidelines, and impacts would be significant and unavoidable. The commenter's suggested mitigation measures are not objective design standards, but subjective design elements, which would not be feasible as mitigation. The Zoning Code includes restrictions on height, setbacks, and floor-area ratio, where appropriate.

Response 70.19

The commenter requests clarification related to compliance with subjective design guidelines.

Objective design standards include measurable limitations, such as height, setbacks, and floor-area ratio. Subjective design guidelines are not measurable, and cannot be guaranteed, as compliance with a subjective guideline may fluctuate depending on the reviewer. Objective design standards "involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official before submittal" (California Government Code Section 65852.21[i][2]). Therefore, the Draft EIR correctly states that compliance with subjective guidelines cannot be guaranteed.

Response 70.20

The commenter states that it is unclear if architectural review for the WH zone would occur.

Applicable design reviews would still be required for sites within the WH zone. Administrative design review will continue to be required in Glen Ellen, but it will be limited to review for compliance with applicable objective standards. For all Housing Element inventory sites, housing development that is consistent with zoning would be a use by right.[5] Zoning-consistent projects would be required to comply with applicable objective design standards (including any objective design-related standards in the General Plan and Chapter 26 of the County Code), but will not be subject to discretionary design review.

Response 70.21

The commenter asserts that the EIR's dismissal of traffic congestion impacts is in error, and that the EIR is required to address compliance with adopted land use policies.

Please refer to Response 70.7 regarding traffic congestion and consistency with County General Plan policies.

Response 70.22

The commenter asserts there is no analysis of consistency with the Glen Ellen Development and Design Guidelines. The commenter asserts that future development on Glen Ellen sites would be subject to these guidelines, and the EIR incorrectly states otherwise. The commenter states that the missing analysis constitutes deferral. The commenter asks about the difference between objective and subjective

[5] As discussed in Section 2.6.4 of the DEIR, "by right" use means that no discretionary land use approvals and no CEQA review would be required for an application for zoning-consistent multi-family development.

guidelines. The commenter asserts that the densification of the Glen Ellen sites is a significant and unavoidable impact.

As described on page 4.1-55: "Specific design guidelines exist for the communities of Glen Ellen and Penngrove, and development in those areas would be subject to the relevant and applicable design guidelines (County of Sonoma 1990; County of Sonoma 2010)." Future development on Potential Sites GLE-1 and GLE-2 would be required to comply with the Glen Ellen Design Guidelines.

Table 4.11-3 has been revised as follows, for clarification and consistency with the analysis in Section 4.1 of the Draft EIR:

General Plan Policy	Discussion
Policy LU-20gg: Land use for the Glen Ellen area, including residential densities, shall correspond with the General Plan Land Use Element for Sonoma Valley. New development in Glen Ellen shall be evaluated in the context of the following: (1) the relationship between growth and traffic congestion, (2) the boundaries and extent of Urban Service Areas, (3) the amount and location of recreation and visitor-serving commercial uses, (4) the need to upgrade existing structures and public infrastructure, and (5) the compatibility of rural development with protection of agriculture, scenic landscapes, and resources. Policy LU-20hh: All new development in the Glen Ellen area (as designated in the Glen Ellen Development and Design Guidelines) shall comply with the Glen Ellen Development and Design Guidelines, which are part of the County Development Code.	**Partially Consistent**. This Program EIR analyzes potential transportation impacts of GLE-1 and GLE-2 in Section 4.16, Transportation. Traffic congestion is not analyzed because it may not be considered a significant impact under CEQA. Those sites are both within the Urban Service Area for Glen Ellen and would not require expansion of or influence the boundaries of the existing Urban Service Area. **Error! Reference source not found.** shows the existing zoning of GLE-1 , GLE-2, and surrounding areas. As shown therein, the recreation and visitor-serving commercial areas would not be modified by the rezoning of these sites. Section 4.15, Public Services and Recreation, and Section 4.18, Utilities and Service Systems, analyze whether the project would require upgrades to public facilities and infrastructure. As stated therein, no upgrades to existing facilities are anticipated for GLE-1 and GLE-2. Section 4.2, Agriculture and Forestry Resources, and Section 4.1, Aesthetics, analyze the potential impacts on agricultural lands and scenic resources. Sites GLE-1 and GLE-2 do not contain prime farmland, unique farmland, farmland of statewide importance, forest land, or timberland, and are not zoned or adjacent to agricultural lands. The project does not propose development on these sites at this time but rezoning to allow for high-density residential development, and future projects would continue to ~~be allowed by-right and would not~~ be subject to review under the Glen Ellen Development and Design Guidelines as discussed in Section 4.1, Aesthetics. In addition, ~~as only~~ objective design standards would apply.

Please refer to Response 70.19 regarding subjective versus objective standards.

Response 70.23

The commenter asserts that Impact BIO-5 does not state what the impact is, but cites county policies. The commenter asserts that heritage trees on the Glen Ellen sites would be removed, and the Draft EIR defers analysis of heritage tree removal to individual projects exempt from CEQA.

The impact statement for Impact BIO-5 on page 4.4-39 of the Draft EIR reads as follows: "Development facilitated by the project on Rezoning Sites would be subject to the County's ordinances and requirements protecting biological resources, such as trees. Impacts would be less than significant." This includes a statement of impacts (less than significant).

The potential for tree removal is acknowledged on page 4.4-40 of the Draft EIR; however, compliance with County-required policies related to heritage trees and tree removal (which apply to all projects in the County, regardless of CEQA requirements) is determined to be adequate to reduce impacts to less than significant.

Response 70.24

The commenter asserts that site GLE-1 contains a well-documented historical structure, which should be addressed in more detail.

Site GLE-1 is listed in Table 4.5-1 as containing a historic-age building. As stated on page 4.5-5 of the Draft EIR: "A review of available listings of the National Register of Historic Places (NRHP), California Office of Historic Preservation, and Sonoma County Historic Landmarks failed to identify any known historical resources or historic districts in the Rezoning Sites that are designated at the federal, state, or local levels." The structure referred to by the commenter has not been officially designated as a historical resource. Mitigation Measures CUL-1 and CUL-2 would reduce potential impacts to historical resources, and implementation of these measures would be required by the County for future development on site GLE-1, as appropriate.

Response 70.25

The commenter states that the EIR does not evaluate the appropriateness of applying the WH zone to the Glen Ellen sites. The commenter expresses support for housing, and opposition to sprawl. The commenter states that Glen Ellen is not within an Urban Growth Boundary, there is no transit, and there is no job center. The commenter asserts that applying the WH zone would be inconsistent with the zone district's stated intent and with other land use policies.

Potential Sites GLE-1 and GLE-2 are currently zoned Limited Commercial (LC). Per Sonoma County Code Section 26-75-010, the WH Combining District may be applied to properties within designated urban service areas with LC base zoning. Therefore, sites GLE-1 and GLE-2 can have the WH Combining District applied without violating the County Code.

The commenter's expressed opinions are noted and passed on to decision-makers for consideration.

As stated in Response 70.12, Sites GLE-1 and GLE-2 are within a designated Urban Service Area. Section 4.16 of the Draft EIR states that none of the Rezoning Sites are within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor, which includes the Glen Ellen sites. Page 4.6-10 of the Draft EIR states that Rezoning Sites located in existing Urban Service Areas ensures that new residences are proximate to commercial, retail, and employment destinations. Commercial businesses, which require employees to function, do exist in the community of Glen Ellen.

Response 70.26

The commenter asserts that the EIR does not address the WH ordinance policy d, related to consistency with Area and Specific Plans. The commenter asserts that the WH zone district is not consistent with General Plan provisions for Glen Ellen, including Policy 20i, specifically bullets 1 and 3.

The commenter is referring to Section 26-75-020 (d) of the Sonoma County Code of Ordinances. Consistency with goals, objectives, policies, and programs is provided under Impact LU-2, beginning on page 4.11-30 of the Draft EIR. As stated therein, the project would not result in a significant environmental impact from a conflict with any land use plan or policy, and impacts are less than significant.

The commenter refers to General Plan Policy LU-20i, which is related to development on Limited Commercial and Limited Commercial – Traffic Sensitive uses in the County, including in Glen Ellen. While the Glen Ellen sites are currently designated Limited Commercial, the proposed project would not change this designation, and would therefore not introduce a conflict with this policy. The addition of the WH zone would not remove or otherwise modify the requirement for future development on the Glen Ellen sites to comply with this policy.

Response 70.27

The commenter references page 4.11-43 and Table 3-1, and asserts that the cumulative land use analysis is inadequate.

The Draft EIR does not contain page 4.11-43 or Table 3-1; therefore, it appears that this comment was made in error.

Response 70.28

The commenter asserts that the density increase would result in buildings that are out of scale with existing surrounding development, with no feasible mitigation. The commenter states that a previous proposal for 15 units on the Glen Ellen sites was rejected due to mass and scale. The commenter asserts that the WH zone would require 16 units to be developed on the Glen Ellen sites, and there is no existing development in Glen Ellen that has a similar density; therefore, the commenter asserts this would be a substantial increase in density. The commenter states that a nearby property was recently redeveloped with 8 units and 2 ADUs, which exacerbates this impact.

County Code Section 26-75-050(1) state that workforce housing projects shall have a minimum density of 16 units per acre and a maximum density of 24 units per acre. As shown in Table 2-4, this corresponds to a maximum development of the Glen Ellen sites of 20 total units (18 units on GLE-1 and 2 units on GLE-2). GLE-1 is 0.73 acres in size, and GLE-2 is 0.12 acres in size, for a total of 0.85 acres. This corresponds to a combined minimum unit requirement of 13.6 (0.85 acres multiplied by 16 units per acre) with application of the WH overlay.

Aesthetic impacts associated with the increase in allowed density on all Rezoning Sites are identified and mitigated to the extent feasible in Section 4.1, *Aesthetics*, of the Draft EIR.

The cumulative development analysis is described beginning on page 4-2 of the Draft EIR. As stated therein, cumulative impacts were evaluated at a programmatic level, and specific individual projects were not identified as part of this analysis.

Response 70.29

The commenter asserts that design review does not consider density and intensity of development. The commenter asserts that compliance with General Plan policies and guidelines in order to protect Glen Ellen's rural character need to be addressed.

Impact LU-2, beginning on page 4.11-30 of the Draft EIR, discusses the project's potential environmental impacts related to conflicts with applicable plans, policies, or regulations. This impact discussion includes an assessment of potential conflicts related to rezoning of the Glen Ellen sites, and determined impacts would be less than significant. Please refer to Response 70.22 regarding adherence of future projects to the Glen Ellen Development and Design Guidelines.

Response 70.30

The commenter asserts that the Glen Ellen sites were included because the property owner had already applied for the WH zone, and asserts that no independent analysis of the appropriateness of this zone was done.

This comment is noted and will be passed on to County decision-makers. Please refer to Master Response SITE for a discussion of the site selection criterion and process.

Response 70.31

The commenter states that previous requests to look at different zone districts for the Glen Ellen sites were not considered. The commenter asserts that such an alternative could reduce impacts to traffic, aesthetics, land use inconsistencies, historic resources, and fire risk.

Please refer to Section 6.4, beginning on page 6-16 of the Draft EIR. As stated therein:

> The County considered a lower density alternative, but this would not achieve project objectives because lower densities would not meet the County's 6th cycle RHNA requirements due to the limitations of finding additional sites that could support residential uses. Therefore, this alternative was rejected.

Additionally, there are no impacts specific to the Glen Ellen sites alone that the commenter's suggested alternative would result in the substantial decrease of an environmental impact or the avoidance of a significant and unavoidable impact. It should be noted that *CEQA Guidelines* Section 15126.6 explains that an EIR is not required to consider every conceivable alternative to a project, but must consider a reasonable range of alternatives. Discussion of a reasonable range of alternatives is provided in Section 6 of the Draft EIR.

Response 70.32

The commenter asserts that placing the WH zone outside of an Urban Growth Boundary would result in a growth-inducing precedent in Glen Ellen, and that this impact was not addressed in the EIR.

Growth-inducing impacts were addressed in Section 5.1 (beginning on page 5-1) of the Draft EIR. In particular, the removal of obstacles to growth is addressed in Section 5.1.3 of the Draft EIR. This analysis covers the potential growth-inducing impacts of the Housing Element Update, including the addition of the WH Combining District to certain sites within the county.

Response 70.33

The commenter states that it is important not to overtax rural infrastructure and resources, and expresses opposition to rezoning the Glen Ellen sites.

The commenter's expressed opinion and preference is noted, and is passed on to decision-makers for consideration.

EIR Public Comment 71

COMMENTER: William Helt

DATE: February 5, 2023

Response 71.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 71.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 71.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 71.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 71.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 71.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 71.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 72

COMMENTER: Anne Marie and Eugene Calhoun

DATE: February 7, 2023

Response 72.1

The commenter expresses concern regarding future density increases in Forestville. The commenter states that while they support affordable housing, the amount being proposed by the project will double the current population and is too much for the area.

Please refer to Master Response HE.

Response 72.2

The commenter asks if existing water supplies will be able to support future growth.

Please refer to Master Response UTIL. As stated therein, water supply is analyzed in Section 4.18, Utilities and Service Systems, of the EIR. Each water service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide water service to the Rezoning Sites. In addition, California American Water – Larkfield prepared a Water Supply Assessment (Appendix WSA) detailing its ability to provide water service to the Rezoning Sites within its service area. With the implementation of proposed capital improvement projects, development facilitated by the project on the Agua Caliente, Glen Ellen, Larkfield, Sonoma, Santa Rosa, Forestville, Graton, Guerneville, Penngrove, and Petaluma Sites would have access to adequate water service. Information was not provided by California American Water – Geyserville. Furthermore, the Rezoning Sites that are not currently directly adjacent to water supply infrastructure (GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4) were not fully evaluated in Appendix WSS for adequate water supply capacity. As such, impacts of development on these sites would be significant and Mitigation Measure UTIL-1 would be required.

Response 72.3

The commenter asks if the existing sewer system will be able to support future growth.

Please refer to Master Response UTIL. Wastewater systems are analyzed in Section 4.18, *Utilities and Service Systems*, of the EIR. R. As stated therein, "[d]evelopment facilitated by the proposed project would create additional demand for wastewater treatment in the Unincorporated County." Wastewater service providers for the Rezoning sites were contacted and assessed in Appendix WSS for their ability to provide wastewater service to the Rezoning Sites." With the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites would have access to adequate wastewater service. However, the Rezoning Sites that are not currently directly adjacent to wastewater collection infrastructure (pipelines) were not fully evaluated in Appendix WSS for adequate sewer capacity (GEY-1, LAR-7, FOR-1, FOR-2, FOR-6, GRA-4, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4). As such, impacts of development on these sites would be significant and Mitigation Measure UTIL-1 would be required.

The following revisions have been made to the Draft EIR for clarification. On page 4.18-14:

> …Additionally, the wastewater capacity for sites GUE-1 through GUE-4, GRA-1 through GRA-5, and PET-1 through PET-4 is either unknown or limited. <u>It should also be noted that Site GRA-4 would</u>

need to be annexed into the Graton Community Services District in order to receive wastewater collection treatment services.

On page 4.18-16, Mitigation Measure UITL-1 has been revised as follows:

Future development proposed on the following sites shall be required to demonstrate that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary improvements to serve a Rezoning Site will be made prior to occupancy:

1. Rezoning Sites that need to demonstrate capacity from the applicable water service provider: GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4.
2. Rezoning Sites that need to demonstrate capacity from the applicable wastewater service provider: GEY-1, GUE-2, GUE-3, LAR-1 through LAR-8, FOR-1, FOR-2, FOR-6, GRA-4, SAN-6, SAN-7, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4.
3. Rezoning Site GRA-4 shall be annexed into the Graton Community Services District prior to development of the site.

The required documentation shall be provided to the County during the plan review and permit approval process for projects on the above-listed Rezoning Sites.

Response 72.4

The commenter states that there are no handicap accessible sidewalks. The commenter expresses concerns regarding road safety, poor road visibility, and unsafe turns during high traffic periods.

Please refer to Master Response EXST.

Response 72.5

The commenter states that they would like to build a granny unit on their property, but the permitting process has made it challenging as they are on septic.

This comment is not relevant to the proposed project. It has been forwarded on to County staff.

Response 72.6

The commenter asks if the County can make the permitting process easier to understand for residents using septic systems.

This comment is not relevant to the proposed project. It has been forwarded on to County staff.

EIR Public Comment 73

COMMENTER: Becky Boyle

DATE: February 7, 2023

Response 73.1

The commenter states that they do not understand why the Draft EIR letter the commenter previously submitted was not included in Item 2 of a Sonoma County Planning Commission meeting. The commenter asks if only three letters have been received so far.

This comment does not pertain to the adequacy of the Draft EIR, but has been forwarded to County staff for their review.

EIR Public Comment 74

COMMENTER: Betty Brachman

DATE: February 7, 2023

Response 74.1

The commenter states that they are a resident of Glen Ellen. The commenter expresses discontent with Marty Winters and states that Winters has pushed to develop the area while neglecting his own properties. The commenter requests that the County remove the two Glen Ellen parcels from consideration for rezoning.

This comment is noted. Please refer to Master Response HE.

EIR Public Comment 75

COMMENTER: Dan O'Leary

DATE: February 7, 2023

Response 75.1

The commenter expresses opposition to the rezoning of sites GUE-2, GUE-3, and GUE-4. The commenter expresses concern regarding increased risk of wildfire, flooding, emergency evacuation, the narrowness of existing roads, issues pertaining to ingress and egress, and inadequacy of existing sewer system infrastructure.

This comment is noted. Please refer to Master Response FIRE regarding fire risk. Please refer to Master Response EMG regarding concerns about emergency evacuation, including the narrowness and dead end at Laughlin Road and road closures due to flooding. Please refer to Master Response EXST regarding the existing sewer system, and Master Response UTIL regarding sewer capacity. As stated therein, "the wastewater capacity for sites GUE-1 through GUE-4, GRA-1 through GRA-5, and PET-1 through PET-4 is either unknown or limited. These sites would require the construction of expanded wastewater facilities, including upgraded pipelines and potentially new pumps."

EIR Public Comment 76

COMMENTER: G.W. Duvall

DATE: February 7, 2023

Response 76.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 76.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 76.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 76.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 76.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 76.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 76.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 77

COMMENTER: Karyn Pulley

DATE: February 7, 2023

Response 77.1

The commenter summarizes their thoughts and involvement in the process so far, and states that it is their belief that site FOR-2 is not favorable for rezoning. The commenter states that they are the owner of FOR-2 and have no desire to sell their property.

This comment is noted. Please refer to Master Response HE.

Response 77.2

The commenter states that FOR-2 serves as a watershed for the areas directly surrounding the property. The commenter expresses concerns regarding impacts to biological resources.

This comment is noted. Please refer to Master Response EXST. Furthermore, biological resources are analyzed in Section 4.6, *Biological Resources*, of the EIR.

Response 77.3

The commenter states that they have reason to believe that tribal cultural resources may be present on the site.

Potential impacts to tribal cultural resources are analyzed in Section 4.17, *Tribal Cultural Resources*, of the EIR, which acknowledges tribal cultural resources are known to exist across the County. The EIR contains mitigation measures in both Section 4.17, *Tribal Cultural Resources*, and Section 4.5, *Cultural Resources*, which would reduce impacts to a less than significant level. This mitigation measures include TCR-1 through TCR-5, which require coordination and consultant with tribes, avoidance of resources, preparation of a tribal cultural resources plan, Native American monitoring, and mitigation regarding human remains when they are expected to be present.

Response 77.4

The commenter notes that the Draft EIR requires mitigation to be implemented if site FOR-2 is rezoned. The commenter asks if this is a wise use of the land and good land management. The commenter asks how the Commission measures greenhouse gas emission, emission hazards, impacts to aesthetics, and impact to cultural resources. The commenter asks that if FOR-2 is developed, how is that managed and who that would be managed by.

The commenter is correct that mitigation would apply to the project. The commenter's opinions and questions are noted. Please refer to Section 4.3, *Air Quality* of the EIR regarding emissions, and Section 4.8, *Greenhouse Gases*, regarding impacts related to greenhouse gases. Aesthetic impacts are analyzed in Section 4.1, *Aesthetics*, and Section 4.5, *Cultural Resources*, addresses impacts to cultural resources. Individual development proposals would be reviewed by the County when submitted by developers.

Response 77.5

The commenter states there is limited transit near site FOR-2. The commenter expresses concerns regarding increased pollutants, changes in air quality, future water and sewer infrastructure improvements, service system needs, road enhancements, and increased traffic.

This comment is noted. Please refer to Master Response EXST. Air quality and pollution levels are analyzed in Section 4.3, *Air Quality* of the EIR. Please refer to Master Response UTIL regarding water and sewer infrastructure and service systems, which are analyzed in Section 4.18, *Utilities and Service Systems*, of the EIR. Transportation impacts are analyzed in Section 4.16, *Transportation*, of the EIR, and road enhancements are also discussed in Section 4.19, *Wildfire*.

Response 77.6

The commenter states that they have not been able to determine if there is any value in rezoning their land. The commenter states that FOR-2 is not a viable parcel for rezoning. The commenter asks that the County reconsider rezoning site FOR-2.

This comment is noted. Please refer to Master Response HE.

EIR Public Comment 78

COMMENTER: Kon Zaharoff

DATE: February 7, 2023

Response 78.1

The commenter asks if the County has responded to an email from another community member. The commenter asks if the County will remove site FOR-2 from further consideration.

Please refer to Master Response HE and Response to Comment 41, which is the letter the commenter is referring to.

Response 78.2

The commenter attached the email from the other community members, Nick Pulley, Kristen Krup, and Karyn Pulley. The attachment describes the commenters opposition to the rezoning of site FOR-2. The commenters state that they will not be selling their property.

Please refer to Response to Comment 41.

EIR Public Comment 79

COMMENTER: Larry Martin

DATE: February 7, 2023

Response 79.1

The commenter asks that the County consider existing traffic, water, and sewage concerns in Forestville. The commenter states that the proposed density is beyond what Forestville is able to accommodate. The commenter requests that new development occur closer to major transportation corridors and in areas with existing sewage treatment plants.

Please refer to Master Response HE and Master Response SITE. Traffic impacts are analyzed in Section 4.16, *Transportation*, and impacts relating to water and sewer capacity are analyzed in Section 4.18, *Utilities and Service Systems*, of the EIR. Refer also to Master Response UTIL.

EIR Public Comment 80

COMMENTER: Marilyn and David Kinghorn

DATE: February 7, 2023

Response 80.1

The commenter states that they were not made aware of the site being rezoned near their home. The commenter disagrees with how rezone sites were chosen and shares the belief that the actions of County Supervisors is irresponsible.

This comment is noted. Please refer to Master Response HE regarding dissatisfaction with the housing element and Master Response SITE regarding site selection.

Response 80.2

The commenter states that site FOR-1 is a hazardous waste site and developing near the site is irresponsible. The commenter states that cleanup of the site should be addressed prior to proposals for development.

This comment is noted. Please refer to Master Response EXST. The commenter is correct, and the EIR identifies FOR-1 as containing the Electro Vector site in Table 4.9-2 of the EIR. Refer to Impact HAZ-2 regarding investigation, remediation, and cleanup before development. Refer also to Response O-2.3 regarding the Electro Vector site.

Response 80.3

The commenter states that there are several environmental concerns regarding site FOR-4 including risks to a nearby creek, potential flood hazards, narrow roads, and steep slopes. The commenter expresses concern about increased traffic and increased risk to other vehicles, bicyclists, and pedestrians.

Please refer to Impact HAZ-2 in Section 4.9, *Hazards and Hazardous Materials*, of the EIR regarding sites within 0.25 miles of sites listed in Table 4.9-2. Please refer to Master Response EXST regarding the existing creek in the area. Impacts related to transportation are analyzed in Section 4.16, *Transportation*. As stated in Master Response FIRE, some roads would require infrastructure improvements before development.

Response 80.4

The commenter states that several issues should be addressed prior to rezoning including, but not limited to, undergrounding utility lines, increasing water storage, addressing sewer system capacity deficiencies, and improving roadways.

Please refer to Master Response EXST. Impacts relating to roads are analyzed in Section 4.16, *Transportation*, and Section 4.19, *Wildfire*, and impacts relating to water and sewer capacity and other utilities are analyzed in Section 4.18, *Utilities and Service Systems*, of the EIR.

Response 80.5

The commenter notes that there was previously discussion about developing a bypass around Forestville. The commenter asks if this being discussed along with the proposed rezone.

This comment does not pertain to the current project and is not related to environmental impacts of the proposed project. Additionally, the bypass has no current schedule for completion by Sonoma Public Infrastructure.

Response 80.6

The commenter asks why Forestville is set to increase population by up to 25 percent rather than 10 percent, similar to other areas.

This comment is noted. Please refer to Master Response HE and Master Response SITE regarding site selection.

Response 80.7

The commenter expresses concern regarding the availability of open space in the area. The commenter asks that the Board of Supervisors put more thought into the proposed rezone prior to construction of future development.

This comment is noted. Impacts to parks are discussed in Section 4.15, *Public Services and Recreation*. This comment has been forwarded to the decision-makers for consideration.

EIR Public Comment 81

COMMENTER: Scott Lietzke

DATE: February 7, 2023

Response 81.1

The commenter expresses concern regarding existing transit, policing and public safety, existing infrastructure inadequacies, and emergency egress in Forestville. The commenter states that the Draft EIR does not adequately address these topics.

Please refer to Master Response EMG regarding evacuation and Master Response EXST regarding existing transit levels. Transportation, including public transit, is analyzed in Section 4.16, *Transportation*, and includes a mitigation for a construction traffic management plan as Mitigation Measure TRA-2. Impacts to police services are discussed in Section 4.15, *Public Services and Recreation*.

Response 81.2

The commenter expresses discontent with the level of communication and community engagement during the planning process.

This comment is noted and has been passed on to the decision-makers.

EIR Public Comment 82

COMMENTER: Stephanie Blumenthal

DATE: February 7, 2023

Response 82.1

The commenter states that the rezoning of site GRA-2 is unjustified. The commenter states that the site currently serves its intended purpose to leave sensitive lands intact. The commenter quotes from the M1 zoning designation

This comment is noted and will be passed on to decision-makers. Please refer to Master Response HE regarding dissatisfaction with the proposed project.

Response 82.2

The commenter states that site GRA-2 is zoned as F2 and lies within a floodway. The commenter quotes the County Code's restrictions for F2 zoning. The commenter states that changing this zoning would be detrimental for reasons listed below.

The commenter is correct that Figure 4.10-6 identified GRA-2 as being located partially within a floodplain. Please refer to responses to specific concerns in Response 82.3 through 82.8 below.

Response 82.3

The commenter states that Rezoning Site GRA-2 identified in the Draft EIR is situated in a riparian corridor, the Atascadero watershed/marsh, which is home to a wide variety of waterfowl, fish, reptiles, and amphibians. The commenter states an opinion that there are threatened or endangered species (coho salmon, steelhead trout, California red legged frog, California freshwater shrimp, and Pitkin marsh lily, among other special-status plants) which could be further endangered through development of this highly sensitive area and invasive plants. The commenter opines that light, glare, paving, loss of trees and shrubs, and increased flooding from loss of soil will have an adverse effect on biotic habitat and bird life, and increased flooding, and when we are facing climate change, this just doesn't seem in their best interests. The commenter further notes that the northmost end of the GRA-2 is a major point of drainage from Ross Road to the Atascadero watershed.

Section 4.4, *Biological Resources*, includes a requirement that *"*for those projects that would result in ground disturbance through clearing/grading or vegetation trimming or removal (e.g., demolition of existing buildings and redevelopment construction, etc.), a project-specific biological assessment (Mitigation Measure BIO-1) would be required. Mitigation Measure BIO-1 requires a site-specific biological resources screening and assessment to evaluate potential habitat including sensitive habitats such as riparian areas and special status species prior to project approval, which would include GRA-2's riparian habitat, which is noted on page 4.4-13 of the EIR. This initial assessment would identify potential habitat for special-status species such as the Pitkin marsh lily and other special-status plants. Pursuant to Mitigation Measure BIO-2, if the project specific biological assessment determines there is potential for impacts to special-status plant species due to project development at GRA-2, a qualified biologist shall complete surveys for special status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). Following this assessment, if special-status plants are found and would be directly impacted at GRA-2, implementation of Mitigation Measure BIO-3 would require projects to be re-designed to avoid impacts to these plant species and

their surrounding habitats. Therefore, sensitive communities, special-status plant species, and associated habitats would be identified on a site-specific basis and avoidance of these species would occur as required by the Draft EIR. As such, no revisions to the Draft EIR are required in response to this comment.

In response to the comment regarding indirect effects from light, glare, paving, and increased flooding from loss of soils, Mitigation Measure BIO-6 in the Draft EIR requires best management practices for sedimentation and erosion control as well as buffers from riparian habitat and/or water bodies, which would reduce and/or avoid impacts to these habitats. Additionally, Impact AES-4 concludes that, with Mitigation Measure AES-2 that would require project designs to incorporate exterior lighting plans to minimize light spillover, impacts relating to light and glare would be less than significant. As such, no revisions to the Draft EIR are required in response to this comment.

Please refer above to Response O-1.2 regarding concerns about project placement near riparian zones and stream habitat. With implementation of Mitigation Measures BIO-15 and BIO-16, impacts to stream habitat and riparian zones would be evaluated and mitigated on a site-specific basis. As such, no revisions to the Draft EIR are required in response to this comment.

In reference to aquatic species, please refer to Response A-1.10. As described therein, Mitigation Measure BIO-6 requires projects occurring within/adjacent to aquatic habitats to be restricted to completion between April 1 and October 31 to avoid impacts to sensitive aquatic species.

Refer also to Response A-1.14, where it is noted that Mitigation Measure BIO-14 requires habitat mitigation at a ratio no less than 1:1 for impacts to sensitive natural communities including riparian areas and waters of the state or waters of the U.S.

Response 82.4

The commenter expresses concerns regarding pedestrian and bicyclist safety near GRA-2.

Impact TRA-2 in Section 4.16, *Transportation*, acknowledges that development may include addition of new driveways or other modifications that may affect transportation safety. As noted therein, "any modifications to public rights-of-way would be required to be consistent with appropriate regulations and design standards set forth by the County's applicable plans, programs, and policies." In addition, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety; therefore, consistency with County policies on traffic safety would ensure the project would not substantially increase hazards due to design features.

Response 82.5

The commenter expresses concerns regarding existing sewer system deficiencies and states that the existing treatment plant does not have capacity to support future development.

Please refer to Master Response EXST regarding the existing sewer capabilities. As stated in Section 4.18, *Utilities and Service Systems*, in the EIR, "the wastewater capacity for sites GUE-1 through GUE-4, GRA-1 through GRA-5, and PET-1 through PET-4 is either unknown or limited. These sites would require the construction of expanded wastewater facilities, including upgraded pipeline and potentially new pumps." Generally, the ground disturbance required to construct these upgrades would occur in previously disturbed or developed areas, such as public rights-of-way, reducing the potential for environmental impacts. Compliance with mitigation measures in this Program EIR, including Mitigation Measures BIO-1 through BIO-17, CUL-1 through CUL-9, and TCR-1 through TCR-5, would minimize impacts to sensitive environmental resources where upgrades require off-site construction for the

expansion of wastewater services. Therefore, the proposed project would not result in construction or relocation of wastewater facilities such that significant environmental impacts would result.

Response 82.6

The commenter states there is no grocery store in Graton and the nearest market is located three miles away.

This comment is noted; however, it does not pertain to CEQA analysis in the EIR.

Response 82.7

The commenter states that the area currently experiences water issues and expresses concerns regarding the availability of well water.

Please refer to Master Response EXST. The EIR analyzes impacts resulting from the project related to traffic in Section 4.16, *Transportation*, and impacts relating to water supply in Section 4.18, *Utilities and Service Systems*, of the EIR, as well as in Appendix WS. As stated on page 4.18-13 of the EIR, "Rezoning Sites not currently directly adjacent to water supply infrastructure (GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4) were not fully evaluated in Appendix WSS for adequate water supply capacity. As such, impacts of development on these sites would be significant and Mitigation Measure UTIL-1 would be required." Mitigation Measure UTIL-1 would require demonstration that water service providers have capacity to serve individual development proposals.

Response 82.8

The commenter offers opinions about housing policy related to affordable units and apartment leasing protocols.

This comment is noted, but does not relate to CEQA or the findings of the EIR.

EIR Public Comment 83

COMMENTER: Alicia Chazen

DATE: February 8, 2023

Response 83.1

The commenter states that they are a resident of Forestville. The commenter expresses concern regarding emergency evacuation and how an increase in the future population may complicate emergency procedures. The commenter states that the existing roads are potentially dangerous.

This comment is noted. Please refer to Master Response HE and Master Response EMG relating to emergency evacuation.

Response 83.2

The commenter states that it is not clear that existing water and sewer infrastructures are adequate to support future development. The commenter requests to see any Water and Sewer District reports on this matter.

Water and sewer infrastructure is analyzed in Appendix WSS based on outreach and coordination with sewer providers, and analyzed in Section 4.18, *Utilities and Service Systems.*

Response 83.3

The commenter states that it is their understanding that there have been requests to expand the boundaries of Forestville which were rejected due to inadequate infrastructure. The commenter states that this conflicts with the proposed project.

This comment does not pertain to the environmental impact analysis in the Draft EIR, but will be forwarded to decision-makers for their review.

Response 83.4

The commenter asks why there are no rezone sites proposed for Santa Rosa, Petaluma, Windsor, and other larger communities in Sonoma County.

The proposed project involves rezoning to facilitate implementation of the Sonoma County Housing Element; Sonoma County does not have authority to rezone parcels within cities in the county as they are separate and independent jurisdictions. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements.

EIR Public Comment 84

COMMENTER: Amanda Shone

DATE: February 8, 2023

Response 84.1

The commenter expresses concerns regarding the proposed rezoning of sites GLE-1 and GLE-2 located in Glen Ellen. The commenter expresses concern regarding the ownership of these sites. The commenter states that Glen Ellen does not have the infrastructure to support future development of these sites.

Please refer to Master Response HE regarding expressions of opinion relating to the rezoning sites. This comment is noted and will be passed on to the decision-makers for their review. Infrastructure such as water and wastewater systems are analyzed in Section 4.18, *Utilities and Service Systems* in the EIR.

EIR Public Comment 85

COMMENTER: Angelica Jochim

DATE: February 8, 2023

Response 85.1

The commenter expresses concern regarding the proposed project and the increase in potential units in Forestville. The commenter states that Forestville lacks the infrastructure to support future development.

This comment is noted. Please refer to Master Response HE. Infrastructure such as water and wastewater systems are analyzed in Section 4.18, *Utilities and Service Systems* in the EIR.

EIR Public Comment 86

COMMENTER: Arleen Zuniga

DATE: February 8, 2023

Response 86.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1

Response 86.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 86.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 86.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 86.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 86.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 86.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 87

COMMENTER: Caitlin Marigold

DATE: February 8, 2023

Response 87.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 87.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 87.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 87.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 87.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 11.5.

Response 87.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 87.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 88

COMMENTER: Christopher DeWolf

DATE: February 8, 2023

Response 88.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 88.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 88.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 88.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 88.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 11.5.

Response 88.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 88.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 89

COMMENTER: Frank Zanca

DATE: February 8, 2023

Response 89.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 89.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 89.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 89.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 89.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 89.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 89.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 90

COMMENTER: Herman J. Hernandez

DATE: February 8, 2023

Response 90.1

The commenter expresses opposition to rezoning sites GUE-1, GUE-2, GUE-3, and GUE-4.

This comment is noted. Please refer to Master Response HE.

Response 90.2

The commenter states that site GUE-1 is located in an area with single car access roads. The commenter states that it is their belief that the infrastructure, water, and sewer are all issues at this site. The commenter expresses concern regarding emergency evacuation at this site.

This comment is noted. Please refer to Master Response EXST regarding the existing road and site location. Please refer to Master Response HE regarding opinions about which sites should be rezoned, and Master Response EMG regarding emergency evacuation. The Draft EIR analyzes infrastructure, including water and sewer, throughout the document, especially in Section 4.18, *Utilities and Service Systems*, and Appendix WSS.

Response 90.3

The commenter states that access to and from GUE-3 is challenging, and streets in this area are narrow. The commenter states that they do not think this site should be rezoned.

Please refer to Master Response EXST regarding comments about the existing road, viewshed, and access. Please refer to Master Response HE regarding opinions about the rezoning of specific properties. Refer to Response 90.2 regarding infrastructure and evacuation analysis.

Response 90.4

The commenter expresses concerns regarding potential traffic increases near site GUE-4. The commenter states that rezoning this site does not seem feasible. The commenter expresses concern regarding traffic, infrastructure needs, and potential flooding near site GUE-4.

Please refer to Master Response EXST regarding comments about the existing road, traffic, and access. Please refer to Master Response HE regarding opinions about the rezoning of specific properties. Potential flooding impacts are addressed Section 4.9, *Hydrology and Water Quality*, of the EIR. The commenter is correct regarding the 100-year floodplain, and the EIR discloses that GUE-4 is listed as partially within the 100-year floodplain on page 4.10-9, and shows this in Figure 4.10-5. As discussed under Impact HWQ-4 of Section 4.10, *Hydrology and Water Quality*, of the EIR, development in the 100-year floodplain would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. Rezoning Sites that are within the Floodway Combining District (F1) or Floodplain Combining District (F2) would be required to comply with County Zoning Code requirements as stated in Articles 56 and 58, respectively, in Chapter 26 of the Sonoma County Code. This includes the prohibition of fill in County-identified special flood hazard areas (refer to Section7B-12 of the Sonoma County Code), and requiring review and approval of proposed drainage facilities by Permit Sonoma. Under Sonoma County Code Sec. 7B-12, encroachment within adopted floodways, including fill, new construction, substantial

improvements, and other development, is not permitted un4.10-2less it has been demonstrated through hydrologic and hydraulic analysis performed in accordance with standard engineering practice and certified by a registered professional engineer or architect licensed in the state of California that the proposed encroachments shall not result in any increase in flood levels during the occurrence of the base flood discharge. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. Therefore, increased flooding on adjacent parcels to the Rezoning Sites would not occur because of the project. Impacts related to flood flows would be less than significant. Refer to Response 90.2 regarding infrastructure and evacuation analysis.

Regarding traffic congestion, on September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law. SB 743 changed the way transportation impact analysis is conducted as part of CEQA compliance. These changes eliminated automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA.

Prior to SB 743, CEQA analysis typically treated automobile delay and congestion as an environmental impact. Instead, SB 743 requires the *CEQA Guidelines* to prescribe an analysis that better accounts for transit and reducing greenhouse gas emissions. In November 2017, the Governor's Office of Planning and Research (OPR) released the final update to *CEQA Guidelines* consistent with SB 743, which recommend using vehicle miles traveled (VMT) as the most appropriate metric of transportation impact to align local environmental review under CEQA with California's long-term greenhouse gas emissions reduction goals. The Guidelines required all jurisdictions in California to use VMT-based thresholds of significance by July 2020. Therefore, traffic congestion was not analyzed in the Draft EIR based on this state law. Refer to Section 4.16, *Transportation*, of the EIR for more transportation analysis.

Response 90.5

The commenter expresses concern regarding road conditions near site GUE-2 and states that increases in population and road use could prevent roadway hazards. The commenter expresses concerns about infrastructure, traffic, and increasing the population of the Armstrong Valley.

Please refer to Master Response EXST regarding comments about the existing road and access. Please refer to Master Response HE regarding opinions about the rezoning of specific properties. Please refer to Response 90.2 regarding infrastructure concerns.

EIR Public Comment 91

COMMENTER: Jonathan Teel

DATE: February 8, 2023

Response 91.1

The commenter expresses opposition to the rezoning of sites GUE-2, GUE-3, and GUE-4. The commenter expresses concern regarding increased risk of wildfire, flooding, emergency evacuation, the narrowness of existing roads, issues pertaining to ingress and egress, and inadequacy of existing sewer system infrastructure.

This comment is noted. Please refer to Master Response FIRE regarding fire risk. Please refer to Master Response EMG regarding concerns about emergency evacuation, including the narrowness and dead end at Laughlin Road and road closures due to flooding. Please refer to Master Response EXST regarding the existing sewer system, and Master Response UTIL regarding sewer capacity.

EIR Public Comment 92

COMMENTER: Laurel Anderson

DATE: February 8, 2023

Response 92.1

The commenter expresses opposition to the proposed rezoning of parcels located in Forestville. The commenter states that the proposed project would negatively impact the community with regards to traffic, public water, and sewage. The commenter urges the County to consider alternatives.

This comment has been forwarded to decision-makers for this review. Please also refer to Master Response HE regarding expressions of opinions related to the rezoning. Refer to Master Response UTIL regarding infrastructure. Impacts related to transportation are analyzed in Section 4.16, *Transportation*, of the EIR; refer also to Master Response TRA regarding traffic congestion.

EIR Public Comment 93

COMMENTER: Leigh Hall

DATE: February 8, 2023

Response 93.1

The commenter requests that rezone sites GLE-1 and GLE-2 be removed from consideration. The commenter states that these parcels are located in a small town, and not in or near an urbanized area.

While Glen Ellen is not an urban area, Glen Ellen is within an urban services area, where public services are available and development is anticipated to occur. Please refer to Master Response SITE and Master Response HE.

Response 93.2

The commenter states that public transportation is very limited.

Please refer to Master Response EXST regarding existing public transportation. The current public transportation levels are an existing condition, not one caused by the proposed project.

Response 93.3

The commenter states that the Board of Supervisors recently approved an EIR for the Sonoma Developmental Center. The commenter expresses concern regarding cumulative impacts to traffic and necessary resources.

Refer to Section 4, *Environmental Impact Analysis*, of the EIR regarding cumulative development. As noted therein, "[b]y its definition, a housing element identifies the overall housing conditions and needs of a community without necessarily identifying specific projects or future development. CEQA analysis of cumulative impacts for a housing element is general in nature."

Specifically, the Sonoma Developmental Center (SDC) Specific Plan was adopted in January 2023, after publication of the Draft EIR for the Housing Element Update project. The SDC Specific Plan had its own EIR, which can be viewed here and addresses transportation and cumulative impacts of the project: https://www.sdcspecificplan.com/documents. As mentioned by the comment, the SDC Specific Plan EIR has been certified by the County Board of Supervisors. As designed and adopted by the Board, the SDC Specific Plan included all feasible mitigation as policies, conditions of approval and actions in the SDC Specific Plan. The SDC EIR and the Board of Supervisors recognized unavoidable significant impacts to cultural, historic, and tribal cultural resources and to transportation. The SDC Specific Plan EIR included a description of the proposed Housing Element rezonings now under consideration in relation to the Housing Element.[6]

[6] Sonoma Developmental Center Specific Plan Draft Environmental Impact Report. State Clearinghouse No. 2022020222. August 2022. https://www.sdcspecificplan.com/documents.

EIR Public Comment 94

COMMENTER: Michael Cuoio

DATE: February 8, 2023

Response 94.1

The commenter states that they do not endorse moving forward with the proposed project until there is concurrent commitment, finding, and improved plans to update all infrastructure needed to support existing and future residents of Forestville. The commenter requests that the County and State implement the existing and approve plans to install a bypass system on Highway 116, the associated roundabout at the intersection of Highway 116/Mirabel Road, and other commitments to transportation and public works in downtown Forestville including crosswalk systems and sidewalks.

The commenter's opinion is noted and will be passed on to decision-makers. The potential bypass is not part of the proposed project and does not relate to the project's EIR. The bypass is not currently scheduled for completion by Sonoma Public Infrastructure.

Response 94.2

The commenter expresses concerns regarding the proposed project's impacts to local schools.

Impacts to schools are analyzed in Section 4.15, *Public Services and Recreation* under Impact PS-3. As stated therein, "development facilitated by the project on Rezoning Sites would generate approximately 1,145 school-aged children across 11 school districts in the County." Based on the projected decline in enrollment across school districts serving the Rezoning Sites and the estimated 1,145 new school-aged children that would result from development associated with rezoning under implementation of the project, most of the school districts would be able to absorb new and incoming students because the increases in the student population are not greater than the anticipated decreases in enrollment (with the exception of Forestville Elementary and Geyserville Unified School Districts). Based on Table 4.15-6, Forestville Elementary may see an increase of 54 students, and Geyserville Unified School District an increase of five students. Applicants would pay school impact fees to applicable school districts at the time building permits are issued, to be used by Sonoma County school districts to mitigate impacts with long-term maintenance and operation of school facilities. This impact would be less than significant, as stated in the EIR.

Response 94.3

The commenter emphasizes the need for the County to fully address, fund, and plan upgrades to Forestville's infrastructure.

This comment does not directly pertain to the analysis in the EIR but will be forwarded to decision-makers for their review.

EIR Public Comment 95

COMMENTER: Rick Sanfilippo

DATE: February 8, 2023

Response 95.1

The commenter asks if anyone had driven to view the site located on Sunset Avenue (GUE-1). The commenter urges County staff so see the site in person. The commenter expresses concern regarding the narrowness of local streets and potential future congestion in the area, and the impacts of construction traffic.

The commenter's questions and opinions will be forwarded to the County decision-makers for review. Please refer to Master Response TRAregarding congestion. Roadways in the area would be subject to increased use through construction and residential traffic, which could result in accelerated deterioration. The County collects countywide traffic development fees pursuant to Article 98 of Chapter 26 of the Sonoma County Code. The payment of these fees by each individual project would alleviate cumulative roadway deterioration impacts to the regional road network. Refer also to Response 21.3 regarding traffic congestion in Guerneville.

Response 95.2

The commenter expresses concern regarding local weather, moisture, and ground stability.

The commenter is expressing a statement not related to analysis in the Draft EIR. However, Section 4.7, *Geology and Soils*, of the EIR includes analysis of soil stability.

Response 95.3

The commenter asks about the reason to invest in a structure on a severely sloped hillside. The commenter states that landslides are common in this area.

Refer to Master Response EXST regarding existing landslide-prone hillsides, which are a current condition and not caused by the project.

Response 95.4

The commenter asks if the area will lose long-standing trees.

As stated in the EIR, such as under Impact AES-3, the project may result in the removal of existing, mature trees. This impact is analyzed in Section 4.1, *Aesthetics*, and under Impact BIO-5 in Section 4.4¸ *Biological Resources*. As stated therein, "[d]evelopment facilitated by the project would be subject to the County's ordinances and requirements protecting biological resources, such as trees… Trees to be removed have not yet been identified because individual projects have not been developed yet; however, development facilitated by the project on Rezoning Sites would potentially require some tree removal, which would be determined during the project's application process." However, development would be required to comply with goals, policies, and measures in the General Plan, including those for applications for tree removal permits and compliance with associated requirements (e.g., tree replacement), where applicable. Therefore, impacts would be less than significant.

Response 95.5

The commenter expresses discontent with the amount of notice they received on the proposed project. The commenter expresses dissatisfaction with their Guerneville's Supervisor.

The commenter's opinions are noted.

Response 95.6

The commenter suggests that there are other sites in Guerneville that should be considered instead of the proposed sites.

The commenter's opinion is noted. Please refer to Master Responses SITE and HE.

EIR Public Comment 96

COMMENTER: Robert Grandmaison

DATE: February 8, 2023

Response 96.1

The commenter states that site GUE-1 is unsuitable for future development. The commenter states that the site is currently used by the Sweetwater Springs Water District. The commenter states that worker vehicles create traffic congestion issues in this area. The commenter states that increased road use would serve as an obstacle to site access.

Refer to Master Response EXST regarding the existing use of the site and roadway conditions. Refer to Master Response TRA regarding traffic congestion .

Response 96.2

The commenter expresses concern regarding the narrowness of the roads on the nearby hillsides.

Refer to Master Response EXST about the current road width. This situation is an existing condition of the area and is not caused by the proposed project.

Response 96.3

The commenter expresses concerns regarding pedestrian safety stating that the roads in the area lack sidewalks, curbs, gutters, or ADA-compliant curb cuts and approaches.

The lack of existing sidewalks, curbs, and curb-cuts are an existing condition of the project area; refer to Master Response EXST. These current conditions are acknowledged on page 4.16-8 of the EIR. Refer to Section 16, *Transportation*, of the EIR regarding pedestrian safety. As stated under Impact TRA-1, "in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks."

Response 96.4

The commenter states that the elevation of the site makes it difficult for those walking to or from town. The commenter states that the roads near the site are narrow and introduce pedestrian safety issues.

Refer to Master Response EXST about the elevation along Woodland Drive. This situation is an existing condition of the area and is not caused by the proposed project.

Response 96.5

The commenter expresses concern regarding vehicle navigability of the roads near the site. The commenter states that large vehicles are unable to access the neighborhood. The commenter expresses concerns regarding parking and overflow parking in the surrounding neighborhood.

Refer to Master Response EXST about the roadway grades and narrow roads. This situation is an existing condition of the area and is not caused by the proposed project. Refer to Section 4.16, *Transportation*, of the EIR regarding construction traffic, which includes a requirement to implement Mitigation

Measure TRA-2 by submitting a construction traffic management plan to mitigate impacts regarding construction traffic. With this mitigation, construction traffic impacts would be less than significant.

Response 96.6

The commenter objects to the proposed rezoning of site GUE-1 on Sunset Avenue in Guerneville and suggests other locations may be preferable.

Refer to Master Response SITE and HE regarding opinions on the housing sites and site selection. The commenter's opinion is noted and will be forwarded to decision-makers for consideration.

EIR Public Comment 97

COMMENTER: Ashley Nolan

DATE: February 9, 2023

Response 97.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 71.1.

Response 97.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 97.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 97.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 97.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 97.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 97.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 98

COMMENTER: Doug Thorogood

DATE: February 9, 2023

Response 98.1

The commenter expresses opposition to the proposed rezone site located at 14156 Sunset Avenue (GUE-1) in Guerneville. The commenter states that the hill where this site is located has narrow and quiet streets that would be adversely impacted by an increase in population. The commenter suggests there are other locations in Sonoma County that may accommodate an increase in traffic.

This comment is noted. Please refer to Master Response SITES, HE, and EXST regarding opinions about the rezoning of sites, and existing conditions related to narrow streets.

EIR Public Comment 99

COMMENTER: Jeanne Reggio

DATE: February 9, 2023

Response 99.1

The commenter expresses opposition to the proposed rezone site located at 14156 Sunset Avenue (GUE-1) in Guerneville. The commenter states this is an inappropriate location for additional housing due to existing road conditions.

Refer to Response EXST regarding the existing condition of GUE-1 and Response HE regarding opinions related to the rezoning. Refer to Response 95.1 regarding impacts to the road.

EIR Public Comment 100

COMMENTER: Kenneth Koutz

DATE: February 9, 2023

Response 100.1

The commenter expresses opposition to the proposed rezone of sites located on Laughlin Road and Cutten Court in Guerneville. The commenter expresses concern regarding road narrowness, lack of pedestrian facilities, existing potholes, lack of bike lanes and sidewalks, and road navigability.

Please refer to Master Response EXST regarding the street widths and road blockages. This is an existing condition of the area and not caused by the proposed project. Future development facilitated by the project on Rezoning Sites would need to confirm that adjacent roads meet County width requirements.

Response 100.2

The commenter states that all nearby roads originate as or are used as exit roads for Guerneville School. The commenter expresses concern regarding congestion and emergency evacuation issues due to increased traffic.

Please refer to Master Response EXST regarding existing street infrastructure, Master Response TRA regarding congestion, and Master Response EMG regarding emergency access and evacuation.

Response 100.3

The commenter states that these roads empty onto Armstrong Woods Road which dead ends. The commenter states that these roads only allow a single car to pass at a time and some are closed throughout the year due to mudslides.

Please refer to Master Response EXST regarding existing street infrastructure. This is an existing condition of the area and not caused by the proposed project. Please refer to Master Response EMG regarding emergency access and evacuation.

Response 100.4

The commenter states that Guerneville has inadequate infrastructure to support future development at the proposed site. The commenter suggests several alternative locations for future housing to be built in Guerneville such as along River Road.

Please refer to Master Response SITE regarding the site selection process. If the sites suggested by the commenter were suggested during the site selection process, they were eliminated based on the provided eligibility requirements.

Response 100.5

The commenter expresses an opinion on the Draft EIR.

The commenter's opinion is noted and passed on to decision-makers for consideration.

EIR Public Comment 101

COMMENTER: Rick Savel

DATE: February 22, 2023

Response 101.1

The commenter provides information regarding the 2016 SCWA SSMP analysis and the latest PSZ and equivalent single family dwelling (ESD) counts. The commenter would like to know how many people the 2016 SCWA SSMP analysis assumed were within the PSZ in 2016.

Please refer to Master Response UTIL and Appendix WSS for further discussions on the water and sewer system capacities. The Draft EIR assumed a conservative additional population based on the California Department of Finance's persons per household estimates for the County of Sonoma in 2019 and individual cities within Sonoma County. We cannot speculate on the method SCWA SSMP used to produce population estimates.

Response 101.2

The commenter would like to know how many persons per ESD were assumed in the 2016 SSMP modeling analysis and whether the SCWA 2016 SSMP update includes a new population baseline over the prior Plan land use element estimated population of 1,300 to 1,450 people under full build-out conditions.

Please refer to Response 101.1 regarding use of population estimate methodology conducted by SCWA.

Response 101.3

The commenter requests that specific capital improvement projects are listed in the EIR and suggests that specific revisions are needed to the agreement with Petaluma for treatment be listed.

Appendix WSS to the EIR acknowledges that a revised agreement with the City of Petaluma may be necessary, and mentions capital improvement projects, such as one that will allow the lift station to continue operating during a flood.

Response 101.4

The commenter questions the following sentence included in the EIR: "28 of the sites appear to have existing sewer infrastructure capacity in order to accommodate additional residential density due to the proposed re-zoning".

This sentence is correct based on the *Water and Sewer Study* included as Appendix WSS of the Draft EIR.

Response 101.5

The commenter opines that there should be a count of existing hookups needed for the land use plan at full buildout and a reserve capacity maintained to allow for failing septic systems in the future. The commenter further opines that this baseline information should be required before consideration of additional housing projects. The commenter requests information regarding who would be financially responsible if there are damages to the sewer system.

Although this comment does not pertain to the analysis or conclusions of the EIR, the comment is noted and will be forwarded to the decision-makers for their consideration.

Response 101.6

The commenter suggests that County staff should pursue implementation of General Plan policy PF- 1b and consider a moratorium on plan amendments and zoning changes in order to protect services to existing residents and entitlements to residents in zones that have not been connected yet.

This comment is on the project rather than the Draft EIR so requires no further response but will be considered by the County's decision-makers as part of the adoption process. Please refer to Master Response UTIL and Appendix WSS for a discussion of the existing capacities of water and sewer systems within the County.

EIR Public Comment 102

COMMENTER: Mark Ballard

DATE: February 9, 2023

Response 102.1

The commenter states they are a resident of Forestville. The commenter states that West County is in need of housing, but expresses concern regarding the existing road network and needed improvements. The commenter suggests a signal light be added at Covey Road and Front Street.

The commenter's opinion is noted and the suggestion has been forwarded to the decision-makers. Regarding the existing roadway network, see Master Response TRA regarding congestion.

EIR Public Comment 103

COMMENTER: Mary Mount

DATE: February 9, 2023

Response 103.1

The commenter expresses opposition to high-density housing Forestville. The commenter expresses concern regarding the narrowness of existing roads and potential ingress and egress issues. The commenter states there is no viable sewer in the area.

The commenter's opinion will be passed on to decision-makers for their consideration. Please refer to Master Response HE regarding opposition to the project. Please refer to Master Response UTIL regarding wastewater treatment capacity concerns. Rezoning Sites in Forestville may be accessed by roadways at least 20 feet in width or greater; however, future development facilitated by the project on Rezoning Sites would need to confirm that adjacent roads meet County width requirements.

Response 103.2

The commenter expresses concern regarding safety and emergency evacuation difficulties that may occur due to potential population increases.

Please refer to Master Response EMG regarding emergency evacuation concerns.

Response 103.3

The commenter states that low-income housing should be placed in incorporated areas in the County near services such as stores, hospitals, culturally diverse schools, and public transit.

The proposed project involves rezoning to facilitate implementation of the Sonoma County Housing Element; Sonoma County does not have authority to rezone parcels within cities in the county as they are separate and independent jurisdictions. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements. Sonoma County must zone sites in the unincorporated areas for housing, so by necessity the project looks at unincorporated communities. Refer to Master Response SITE for more information on site selection.

Response 103.4

The commenter suggests that sites should be centered near Healdsburg, Santa Rosa, Sebastopol, and Windsor.

Please refer to Master Response SITE for more information on site selection. Please refer to Master Response UTIL regarding wastewater treatment. Section 4.10 of the Draft EIR addresses potential water quality and flooding impacts.

EIR Public Comment 104

COMMENTER: Michael Korreng

DATE: February 9, 2023

Response 104.1

The commenter expresses concerns regarding existing traffic conditions and pedestrian safety in Forestville. The commenter suggests that Highway 116 and Mirabel Road crossing should be improved. The commenter suggests installation of a traffic light.

Please refer to Master Response EXST regarding existing traffic safety conditions and Response 119.2. This comment is noted and has been passed on to decision-makers for consideration.

Response 104.2

The commenter suggests that sidewalks should be added from proposed developments into the Downtown area of Forestville and all public transportation locations.

Page 4.16-15 of the Draft EIR states:

> …in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks.

Response 104.3

The commenter suggests that designated parking should be added near bus stops. The commenter states that people that use the bus will need more parking.

The commenter's opinion will be forwarded to decision-makers for their consideration. Parking is not considered an environmental impact and is not required to be analyzed under CEQA. The County Code sets parking standards for new development, and future project plans would be reviewed by County staff for the provision of parking per the code.

EIR Public Comment 105

COMMENTER: Paige MacDonell

DATE: February 9, 2022

Response 105.1

The commenter states that they live adjacent to site GUE-4 in Guerneville. The commenter expresses concern about how rezoning the parcel may impact future flooding in the neighborhood. The commenter asks why rezoning a property in an active flood zone is being considered without studies or flood mitigation for the surrounding neighborhood. The commenter states the Draft EIR does not reference such studies. The commenter expresses concerns regarding flood hazards that could occur at site GUE-4. The commenter includes images of previous floods near 16050 Laughlin Road.

As noted on page 4.10-9, GUE-4 is located partially within the 100-year floodplain. Refer to Response 90.4. Photos provided by the commenter are of existing conditions present on the project site; refer to Master Response EXST. As noted in Impact HWQ-4, individual development projects would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. This includes achieving zero net fill within these sites following development, avoiding fill in areas that retain flood waters, and requiring review and approval of proposed drainage facilities by Permit Sonoma. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. The EIR does not include site-specific flooding studies, which would be required when individual projects come forward, because details of projects are not known at this point, and would vary by individual development proposal.

EIR Public Comment 106

COMMENTER: Patrick Waters

DATE: February 9, 2023

Response 106.1

The commenter expresses opposition to the proposed rezone site at 14156 Sunset Avenue in Guerneville because of narrow and quiet streets and that other locations may be better.

The commenter's opposition to the project is noted and will be passed on to decision-makers for review. Refer to Master Response SITE related to the site selection process and Master Response HE related to expressions of opposition.

EIR Public Comment 107

COMMENTER: Paul Paddock

DATE: February 9, 2023

Response 107.1

The commenter states that they are the owner of site FOR-4. The commenter expresses opposition to the proposed density at the site. The commenter expresses concerns regarding site access, street narrowness, and underlying soil conditions. The commenter expresses concerns regarding the proposed density increase and type of housing proposed at the site. The commenter states that they would be in support of a density increase if the increase would be more compatible with the immediate neighborhood, community, and site conditions.

The commenter's opposition to the project is noted and will be passed on to decision-makers for review. Refer to Master Response SITE regarding the site selection process, Master Response HE regarding project opposition, and Master Response EMG regarding site access. Information and analysis on soil conditions is available in Section 4.7, *Geology and Soils*, of the EIR.

EIR Public Comment 108

COMMENTER: Rick Harrington

DATE: February 9, 2023

Response 108.1

The commenter expresses opposition to the rezone site located at 14156 Sunset Avenue (GUE-1). The commenter states that the site is providing water storage and treatment for central Guerneville and states the opinion that the existing use is the best use for the site. The commenter states the hilltop is unsuitable and notes access concerns, as well as concerns about neighborhood character and quality. The commenter expresses opposition to the site due to potential tree removal, existing road conditions and potential increase in traffic.

The commenter's opposition to the project is noted and will be passed on to decision-makers for review. Refer to Master Response SITE regarding the site selection process and Master Response HE regarding opposition to the project. The EIR acknowledges that tree removal may be required for some projects, as described in Response 95.4. Refer to Master Response EMG regarding access concerns. Regarding community character, please refer to Impact AES-3, beginning on page 4.1-56 of the Draft EIR in Section 4.1, *Aesthetics*, regarding potential impacts of rezoning and future development of the rezoning as it relates to visual character or quality. As described therein, site GUE-1 has a moderate sensitivity where development would be co-dominant.

Refer to Master Response EXST regarding the street widths and existing traffic safety conditions. This is an existing condition of the area and not caused by the proposed project. Future development facilitated by the project on Rezoning Sites would need to confirm that adjacent roads meet County width requirements. Please refer to Section 4.16, *Transportation*, of the Draft EIR regarding traffic pertaining to the proposed project.

EIR Public Comment 109

COMMENTER: Sandy Strassberg

DATE: February 9, 2023

Response 109.1

The commenter expresses opposition to the rezone sites located at APN 054-290-057 and 054-290-084 (GLE-1 and GLE-2). The commenter states that Glen Ellen is a small town, and their preference is to keep the town small. The commenter expresses concerns regarding existing road conditions and parking.

Please refer to Master Response HE and EXST. The commenter's opinion will be forwarded to decision-makers for their consideration. Parking is not considered an environmental impact and is not required to be analyzed under CEQA. The County Code sets parking standards for new development, and future project plans would be reviewed by County staff for the provision of parking per the code.

EIR Public Comment 110

COMMENTER: Sharon Smith and David Wakely

DATE: February 9, 2022

Response 110.1

The commenter expresses opposition to the amount of rezoning being proposed in Forestville.

Please refer to Master Response HE and EXST. The commenter's opinion will be forwarded to decision-makers for their consideration.

Response 110.2

The commenter summarizes concerns of another resident, stating that the Draft EIR does not discuss displacement, loss of character, threats to local businesses, community conflicts, pollution-related health conditions, sanitation needs, traffic, and road conditions citing a need for wider roads, left-hand turn lanes, roundabouts, traffic lights, street lights, and crosswalks.

Please refer to pages 4.14-9 and 4.14-10 of Section 4.10, *Population and Housing,* of the Draft EIR for information regarding displacement. As discussed therein, some of the Rezoning Sites contain existing housing or other structures that could be removed during project implementation. However, the proposed project would enable development in the unincorporated county that could result in a net increase of 3,312 residential units on the Rezoning Sites. One of the fundamental goals of the project is to provide more housing development opportunities throughout the County and meet countywide housing inventory requirements. Thus, Mitigation Measure PH-1 requires that replacement housing be made temporarily available for any displaced existing residents prior to the demolition of existing housing on any of the Rezoning Sites.

Threats to local businesses, community conflicts, and parking are not required topics under CEQA.

The commenter does not specify the type of health impacts they are referring to. For information regarding impacts to air quality, please refer to Section 4.3, *Air Quality,* of the Draft EIR. For information regarding impacts to hazards please refer to Section 4.9, *Hazards and Hazardous Materials,* of the Draft EIR. For information regarding impacts to noise, please refer to Section 4.13, *Noise,* of the Draft EIR.

Please refer to Master Response UTIL regarding sanitation needs.

Please refer to Section 4.16, *Transportation*, of the EIR for information regarding traffic safety. Currently, no road widening, addition of turn lanes, roundabouts, or crosswalks is proposed. The need for infrastructure improvements would be ascertained on a project-by-project basis when individual developments are proposed.

Response 110.3

The commenter expresses concerns regarding fires, evacuation routes, and water supply.

Please refer to Master Response FIRE regarding wildfire, Master Response EMG regarding evacuation routes, and Master Response UTIL regarding water supply.

Response 110.4

The commenter requests that a narrower approach to development is considered in the area.

The comment is noted and will be passed on to decision-makers for review.

EIR Public Comment 111

COMMENTER: Suan and Ron Reed

DATE: February 9, 2022

Response 111.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 111.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 111.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 111.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 111.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 111.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 111.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 112

COMMENTER: Brad Wallace

DATE: February 10, 2023

Response 112.1

The commenter opposes the rezoning of GUE-2, GUE-3, GUE-4. The commenter expresses concern about noise and existing road conditions including narrow roads and lack of sidewalks.

Please refer to Section 4.13, *Noise,* of the Draft EIR for information regarding noise. Refer to Master Response EXST regarding the street widths and existing traffic safety conditions. This is an existing condition of the area and not caused by the proposed project. Future development facilitated by the project on Rezoning Sites would be required to confirm that adjacent roads meet County width requirements.

Response 112.2

The commenter expresses concerns regarding traffic on Laughlin Road related to garbage trucks and additional residents.

Section 4.16, *Transportation*, of the EIR for information regarding traffic. Please refer to Master Response TRA regarding traffic congestion concerns. Please refer to Impact UTIL-2, beginning on page 4.18-16 of the Draft EIR, regarding solid waste impacts. As noted therein adequate infrastructure existing to serve development facilitated by the project on Rezoning Sites.

Response 112.3

The commenter expresses concern about wastewater capacity and fees, water supply, and power lines.

Please refer to Master Response UTIL regarding water and wastewater service availability. In addition, please refer to Section 4.18, *Utilities and Services Systems,* of the Draft EIR. As stated on page 4.18-14, each wastewater service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide wastewater service to the Rezoning Sites. With the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites would have access to adequate wastewater service. Water and sewer districts charge connection fees and monthly usage fees, which are intended to cover the necessary improvements needed to serve a project site. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes sewer usage fees.

Please refer to page 4.18-15 of the Draft EIR, where it is noted that existing electrical infrastructure exists near the Rezoning Sites, and it is not anticipated that the construction of new electrical transmission and distribution lines would be required.

Response 112.4

The commenter states that site GUE-4 is in a floodplain and expresses concern about flooding, groundwater recharge, and evacuation routes.

As shown in Figure 4.10-5, GUE-4 is partially within the 100-year floodplain. As acknowledged under Impact HWQ-4 on page 4.10-28, for sites partially within the 100-year floodplain, development would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. This includes achieving zero net fill within these sites following development, avoiding fill in areas that retain flood waters, and requiring review and approval of proposed drainage facilities by Permit Sonoma. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. Therefore, increased flooding on adjacent parcels to the Rezoning Sites would not occur because of the project.

Refer to Impact HWQ-2, on pages 4.10-25 and 4.10-26 of the Draft EIR regarding potential impacts related to groundwater recharge and the construction of impervious surfaces. As stated therein, future development would be required to comply with relevant state and local standards, which would ensure that future development does not substantially interfere with groundwater recharge.

Refer to Master Response EMG regarding access and evacuation routes.

Response 112.5

The commenter expresses concern about narrow roads, access to public services and public transportation for proposed rezoning sites.

Please refer to pages 4.15-1 through 4.15-5 of the Draft EIR regarding access to public services and pages 4.16-5 and 4.16-6 of the Draft EIR for information regarding public transportation. Refer to Master Response EXST regarding existing narrow roads and transit availability. This situation is an existing condition of the area and is not caused by the proposed project.

Response 112.6

The commenter states that it is unclear if fewer units could be built on the Rezoning Sites and that they have had difficulty having questions answered during the planning process. The commenter asserts that the rezoning should not be rushed because of the state, and states an intent to litigate.

The commenter's opinion will be forwarded to decision-makers for their consideration. Please refer to Master Response HE.

New development would be required to comply with zoning requirements. County Code Section 26-08-040 states that R3 projects shall have a minimum density of 12 units per acre. Therefore, fewer units than the maximum density may be proposed, and additional approvals would not be required as long as a project meets the minimum density requirement. To provide a conservative analysis in the EIR, it was assumed that the full site acreage of each Rezoning Site would be developed at the required density. However, net density would reflect any site-specific constraints such as riparian or floodway setback, which would reduce the total amount of units that could be developed.

Please refer to Section 6.4, beginning on page 6-16 of the Draft EIR. As stated therein:

> The County considered a lower density alternative, but this would not achieve project objectives because lower densities would not meet the County's 6th cycle RHNA requirements due to the limitations of finding additional sites that could support residential uses. Therefore, this alternative was rejected.

It should be noted that *CEQA Guidelines* Section 15126.6 explains that an EIR is not required to consider every conceivable alternative to a project, but must consider a reasonable range of alternatives. Discussion of a reasonable range of alternatives is provided in Section 6 of the Draft EIR.

EIR Public Comment 113

COMMENTER: Cassandra Shafer

DATE: February 10, 2023

Response 113.1

The commenter notes that they agree that affordable housing is an urgent need, but that they have some concerns.

The comment is noted and will be passed on to decision-makers for consideration.

Response 113.2

The commenter expresses concern about drought conditions and water and wastewater capacity. The commenter asks how the construction of new sewer lines to FOR-4 and how wastewater capacity improvements would be funded. The commenter asks if water rates will increase as a result of the new development.

Please refer to Master Response UTIL. In addition, please refer to Section 4.18, *Utilities and Services Systems,* of the Draft EIR. As stated on page 4.18-14, each wastewater service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide wastewater service to the Rezoning Sites. With the implementation of proposed capital improvement projects, development facilitated by the project would have access to adequate wastewater service. Water and sewer districts charge connection fees and monthly usage fees, which are intended to cover the necessary improvements needed to serve a project site. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes property taxes.

Response 113.3

The commenter expresses concern about emergency service access, emergency vehicle access and emergency evacuation routes. The commenter asks if it would make more sense to increase housing near US 101.

Please refer to Master Response EMG regarding emergency vehicle access and emergency evacuation routes and Master Response SITE regarding the site selection process.

Response 113.4

The commenter expresses concern about existing road conditions including narrow roads, and the costs and responsibility associated with road improvements.

Refer to Master Response EXST regarding the street widths and existing traffic safety conditions. This is an existing condition of the area and not caused by the proposed project. Road improvements have not been identified at this time as they relate to potential development facilitated by the project on Rezoning Sites. Future development facilitated by the project on Rezoning Sites would need to confirm that adjacent roads meet County width requirements.

Revenue from the Sonoma County's Development Fees (codified in the Sonoma County Code, Section 26, Article 98) pays for selected road improvements that are required to serve new development and

maintain a safe and efficient level of service. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, including costs associated with future road improvements.

Response 113.5

The commenter expresses concern about public transportation including bus access and potential greenhouse gas emissions.

Please refer to Master Response EXST regarding existing transportation conditions. Refer to pages 4.16-5 and 4.16-6 of the Draft EIR for information regarding public transportation, and Section 4.8, *Greenhouse Gas Emissions*, of the Draft EIR for information regarding greenhouse gas emissions.

The Draft EIR determined there is no feasible mitigation available to reduce GHG emissions from fuel consumption associated with light-duty vehicles to a less than significant level. Implementation of Mitigation Measure GHG-1 would ensure that any residential development facilitated by the proposed project on Rezoning Sites would comply with current BAAQMD GHG thresholds for individual land use projects to the extent feasible, and Mitigation Measure TRA-1 would require a Transportation Demand Management (TDM) program to reduce vehicle trips, and therefore GHG emissions associated with vehicle trips, consistent with the BAAQMD GHG thresholds.

Response 113.6

The commenter supports affordable housing within walking distance of elementary and high schools. The commenter asks if families with children will receive priority access to new housing.

This comment has been noted and has been passed on to decision-makers for consideration.

The comment regarding priority access to housing does not pertain to the analysis presented in the Draft EIR. Future residents who may reside in new developments are not determined through CEQA. Restricting who may potentially reside in future developments based on past or existing connection to the county would be a violation of the Fair Housing Act.

Response 113.7

The commenter expresses concern regarding property taxes and expresses support for more affordable housing. The commenter states that enrollment has dropped at Santa Rosa Junior College and many faculty have had their workloads and incomes reduced. The commenter questions if construction is the right decision and questions the ability to balance between sustainability, increased population, and economic equity.

This comment regarding property taxes and workload for staff at Santa Rosa Junior College does not pertain to the proposed project, but rather to existing conditions. Refer to Master Response EXST. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes economic equity.

Response 113.8

The commenter suggests that the County delay re-zoning due to concerns about water capacity, fire, transportation, air quality, and population uncertainty and states that affordable housing should focus on the 101 corridor due to these concerns.

The commenter's preference to delay the project is noted and has been passed on to decision-makers for consideration. Please refer to Response 113.2 through Response 113.7 regarding the commenter's specific concerns.

Response 113.9

The commenter suggests that sites with sewer infrastructure and road access on more than one side would be preferable to site FOR-4.

The comment is noted and will be passed on to decision-makers for consideration. Please refer to Master Response SITE regarding site selection.

EIR Public Comment 114

COMMENTER: David Kristof

DATE: February 10, 2023

Response 114.1

The commenter states that there is insufficient information in the DEIR regarding site ELD-1 and requests feedback regarding the decision to include site ELD-1.

Site ELD-1 is included in Table 2-2 on page 2-7 of the Draft EIR. As stated therein, the site is not part of the 59 proposed rezone sites; rather ELD-1 is included in the housing inventory and is currently zoned for a residential density that would allow the county to meet their RHNA requirement without rezoning the site. The proposed project would not involve any development on any of the sites, including ELD-1, and the Draft EIR impact analysis focuses on impacts related to the rezoning of sites. Because ELD-1 would not be rezoned, there are no proposed changes or development on this site as part of the proposed project, and the proposed project would not change the buildout capacity of ELD-1, it is not discussed or analyzed in depth throughout the impact analysis sections in the Draft EIR.

Response 114.2

The commenter claims that site ELD-1 was included solely for the purpose of meeting State minimum buildout requirements.

This comment is noted. The commenter is correct that site ELD-1 would help the County meet their RHNA requirements. However, ELD-1 is currently zoned for residential density sufficient to meet this requirement, and therefore rezoning would not be required.

Response 114.3

The commenter expresses concerns regarding minimum setbacks.

Restrictions on height, setbacks, and floor-area ratio, where appropriate, would follow the applicable zoning requirements outlined in the Sonoma County Zoning Code.

Response 114.4

The commenter expresses concerns about environmental impacts.

The proposed project does not itself include development on any of the rezone or housing inventory sites, including ELD-1. Environmental impacts related to the rezoning of 59 of the inventory sites (noted with a "yes" in the last column of Table 2-2 in the Draft EIR) are discussed in depth throughout each section of the Draft EIR as required by CEQA.

Response 114.5

The commenter expresses concerns about impacts to Sonoma Creek.

Impacts to biological resources, including creeks, is included in Section 4.4, *Biological Resources*, in the Draft EIR. As stated therein, impacts to creeks and wetlands would be significant and would require

mitigation measures BIO-15 and BIO-16 to reduce impacts to be less than significant. Please note that these impacts are only related to rezone sites. Sites that are not to be rezoned were not included in this analysis as the proposed project would not change what could be currently developed on other housing inventory sites.

Response 114.6

The commenter expresses concerns about impacts caused by storm drainage outflows.

Please refer to Section 4.10, *Hydrology and Water Quality*, in the Draft EIR for a full discussion of stormwater and drainage. As discussed therein, development facilitated by the proposed project on Rezoning Sites would be required to comply with the SWRCB Construction General Permit, which requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) for projects that disturb one acre or more of land. Additionally, as discussed on page 4.10-26 of the Draft EIR, development facilitated by the proposed project on Rezoning Sites would not exceed the capacity of existing or planned stormwater drainage systems. Sites that are not to be rezoned were not included in this analysis as the proposed project would not change what could be currently developed on other housing inventory sites.

Response 114.7

The commenter expresses concerns about impacts to creek corridors and waterborne plants and animals.

Please refer to Section 4.4, *Biological Resources*, in the Draft EIR. As discussed therein, impacts to biological resources including special-status plants and animals could be significant and would require mitigation measures BIO-1 through BIO-17. Sites that are not to be rezoned were not included in this analysis as the proposed project would not change what could be currently developed on other housing inventory sites.

Response 114.8

The commenter expresses concerns about parking.

Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

Response 114.9

The commenter expresses concerns about increased traffic, especially in the cul-de-sac where 15577 Brookview Drive (ELD-1) is located.

Please refer to Master Response TRA regarding traffic impacts related to the rezone sites. The proposed project would not change the buildout capacity of ELD-1.

Response 114.10

The commenter expresses concerns regarding building height limitations.

Please refer to response 114.3, above.

Response 114.11

The commenter expresses concerns about the neighborhood's capacity to meet demands including an added sewer connection at the proposed site.

Please refer to Master Response UTIL regarding infrastructure impacts related to the rezone sites. Sites that are not to be rezoned were not included in this analysis as the proposed project would not change what could be currently developed on other housing inventory sites, including ELD-1.

Response 114.12

The commenter expresses concerns about the neighborhood's capacity to meet demands at the proposed site including degenerative asphalt street pavement. The commenter has concerns about increased traffic on the existing street.

Please refer to Master Response EXST and TRA regarding impacts related to the rezone sites. Sites that are not to be rezoned were not included in this analysis as the proposed project would not change what could be currently developed on other housing inventory sites, including ELD-1.

EIR Public Comment 115

COMMENTER: Melody Clark

DATE: February 14, 2023

Response 115.1

The commenter expresses concerns regarding the over-development near site FOR-2. The commenter asserts that the neighborhoods surrounding the Inventory Sites are not considered.

The commenter's opposition to the project is noted and will be passed on to decision-makers for consideration. Refer to Master Response SITE regarding the site selection process and Master Response HE regarding opposition to the project.

Response 115.2

The commenter expresses concerns regarding the number of homes that would be facilitated by the project.

The commenter's opposition to the project is noted and will be passed on to decision-makers for review. Refer to Master Response SITE regarding the site selection process and Master Response HE regarding opposition to the project.

Response 115.3

The commenter expresses concern regarding sewer system capacity.

Please refer to Master Response UTIL regarding utility availability. Development facilitated by the project on Rezoning Sites would not rely on septic systems. FOR-2, the site the commenter is inquiring about, is included in Mitigation Measure UTIL-1 as it is not adjacent to existing wastewater or sewer service, as described in detail in Appendix WSS and Section 4.18, *Utilities and Service Systems*. This mitigation measure would require the future developer of the site to demonstrate capacity from the applicable wastewater service provider before development. This would likely entail an extension of the wastewater system to serve proposed development.

Response 115.4

The commenter expresses concerns regarding existing traffic on Mirabel Road and evacuation routes.

Refer to Master Response EXST regarding existing conditions. These conditions are not caused by the project or a result of the project. Please refer to Master Response EMG regarding emergency evacuation.

Response 115.5

The commenter states that there is no school on Mirabel Road near site FOR-2, but a park maintained by the community is in that area. The commenter expresses concerns regarding safety features at site FOR-2 including crosswalks. The commenter asks who will install crosswalks from FOR-2 to cross the street.

The commenter is correct, and the EIR has been revised as follows to correctly identify the Forestville Youth Park (page 4.1-18):

> On Mirabel Road, the Forestville Youth Park ~~a school~~ is directly across the street from FOR-2.

General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety; therefore, consistency with County policies on traffic safety would ensure the project would not substantially increase hazards due to design features.

At this time, no new crosswalks are proposed near FOR-2, as the project would implement the rezoning of FOR-2 only.

Response 115.6

The commenter expresses concerns regarding services, such as grocery stores, and notes public transportation is unreliable.

This comment pertains to existing conditions in the County. Please refer to Master Response EXST.

Response 115.7

The commenter expresses their opinion that the proposed project feels rushed.

The commenter's perspective on the project is noted and will be passed on to decision-makers for consideration.

Response 115.8

The commenter states the opinion that a better place for higher density housing would be closer to community services, shopping, transportation, employment areas. The commenter questions employment opportunities that will be available to new residents.

This comment does not pertain to the contents of the EIR. Please refer to Master Response SITE regarding site selection and Master Response HE regarding opposition to the project. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes employment opportunities for new residents.

Response 115.9

The commenter expresses concerns regarding insufficient cellular reception.

Please refer to Section 4.18*, Utilities and Service Systems*, regarding telecommunications impacts, and Master Response EXST regarding existing conditions. Impact UTIL-1 states that "[p]roject implementation requires connections to existing adjacent utility infrastructure to meet the needs of site residents and tenants… The project would be required to adhere to applicable laws and regulations related to the connection to existing telecommunication infrastructure."

Response 115.10

The commenter asserts that additional services are needed. The commenter states the opinion that it would be better to reduce the density in the AR and RR zones or allow lot splits for new homes to gradually accommodate additional units than building high density urban style homes in this area.

The commenter's opinion on the project is noted and will be passed on to decision-makers for consideration. Please refer to Section 6.4, *Alternatives Considered but Rejected*, in the Draft EIR for a discussion of rezoning to a lower density district and why that alternative was ultimately rejected.

EIR Public Comment 116

COMMENTER: Kris Nevius

DATE: February 10, 2023

Response 116.1

The commenter states that more affordable housing is needed. The commenter expresses concerns regarding strain on the roads and sewer system.

Refer to Master Response UTIL regarding the sewer system. Development facilitated by the project on Rezoning Sites would connect to public wastewater services. Roadways in the area would be subject to increased use through construction and residential traffic, which could result in accelerated deterioration. The County collects countywide traffic development fees pursuant to Article 98 of Chapter 26 of the Sonoma County Code. The payment of these fees by each individual project would alleviate cumulative roadway deterioration impacts to the regional road network.

Response 116.2

The commenter asks the County to consider reducing the number of homes proposed for Graton and for the other communities in Sonoma County.

The commenter's opposition to the project is noted and will be passed on to decision-makers for review. Refer to Master Response SITE regarding the site selection process and Master Response HE regarding opposition to the project.

EIR Public Comment 117

COMMENTER: No Name – Letter with Signature Sheet

DATE: February 10, 2023

Response 117.1

The commenter expresses opposition to the inclusion of FOR-2, and insinuates that insufficient analysis was completed.

The commenter's opinion is noted and passed on to decision-makers for consideration. Please refer to Master Response SITE regarding the site selection process. Please refer to Response 117.2 through 117.54 for responses to specific concerns.

Response 117.2

The commenter provides background on the community of Forestville and states the increase in population and housing units as a result of the project.

This comment does not pertain to the analysis provided in the EIR, and no response is required.

Response 117.3

The commenter states that most businesses in Forestville are located on SR-116. The commenter describes existing parking in the area. The commenter states that sidewalks are nonexistent, non-contiguous, or in poor condition. The commenter states there are no bike lanes. The commenter states that road crossings are not safe for pedestrians. The commenter states that there is one bus stop.

Please refer to Master Response EXST regarding existing conditions. This comment does not pertain to the analysis provided in the EIR, and no response is required.

Response 117.4

The commenter states that downtown Forestville is built out. The commenter describes FOR-1, including existing groundwater contamination associated with the site.

Please refer to Master Response EXST regarding existing conditions. This comment does not pertain to the analysis provided in the EIR, and no response is required.

Response 117.5

The commenter states that street lighting is only present in downtown Forestville, and notes there are minimal light emissions.

Please refer to Master Response EXST regarding existing conditions. This comment does not pertain to the analysis provided in the EIR, and no response is required.

Response 117.6

The commenter states that new jobs in Forestville are rare, and most are minimum wage service industry jobs.

Please refer to Master Response EXST regarding existing conditions. This comment does not pertain to the analysis provided in the EIR, and no response is required.

Response 117.7

The commenter provides a list of government services, business types, and human services in Forestville. The commenter states there are no social services or medical facilities, cell service is limited, and the closest grocery store is 1.25 miles away.

Please refer to Master Response EXST regarding existing conditions. This comment does not pertain to the analysis provided in the EIR, and no response is required.

Response 117.8

The commenter provides excerpts from the Sonoma County General Plan that they assert are relevant to Forestville.

This comment does not pertain to the analysis provided in the EIR, and no response is required.

Response 117.9

The commenter describes the street network and surrounding development near FOR-2. The commenter provides the existing and proposed maximum allowable density on FOR-2. The commenter states that people travel to the neighborhood around FOR-2 to walk, despite there being no sidewalks or street lights. The commenter describes existing ingress/egress to FOR-2. The commenter notes that the owner of FOR-2 has no intention of selling the property, and provides Letter 77 as an attachment. The commenter asks what is stopping the landowner from selling the ingress/egress points to FOR-2.

This comment does not pertain to the analysis provided in the EIR, and no response is required. Responses to Letter 77 are provided as Response 77.1 through Response 77.6. The County cannot prohibit the sale of property. Future development projects on FOR-2 would be required to demonstrate adequate ingress/egress, similar to development elsewhere in the county.

Response 117.10

The commenter notes that the Draft EIR identifies FOR-2 as having more environmental constraints than other Rezoning Sites. The commenter lists significant impacts associated with FOR-2 that are not listed in the Draft EIR. The commenter asks if it would be appropriate to remove FOR-2 from the list of Rezoning Sites. The commenter asks how the county will assume legal responsibility for traffic accidents, stormwater pollution, biological resource impacts, flooding, and sewer backups.

If County decision-makers approve Alternative 3 instead of the proposed project, then FOR-2 would not be rezoned.

Please refer to Impact TRA-2, on page 4.16-18 of the Draft EIR, regarding traffic safety impacts. As noted therein, the project would not substantially increase traffic hazards or result in incompatible uses and impacts were determined to be less than significant.

Please refer to Impact HWQ-3, beginning on page 4.10-26 of the Draft EIR, regarding impacts related to stormwater pollution. As described therein, future development facilitated by the project on Rezoning Sites would be required to comply with state and local laws related to stormwater pollution controls during construction and operation, and impacts would be less than significant.

Please refer to Section 4.4.3, beginning on page 4.4-27 of the Draft EIR, related to biological resource impacts. Where necessary, appropriate mitigation measures are required to reduce potential impacts to less than significant.

Please refer to Impact HWQ-4, on page 4.10-28 of the Draft EIR, regarding flood impacts. As stated therein, development facilitated by the project on Rezoning Sites would be required to comply with applicable General Plan policies and County code requirements, ensuring that impacts would be less than significant.

Please refer to Impact UTIL-1, beginning on page 4.18-22 of the Draft EIR, regarding sewer impacts. As stated therein, mitigation measures are required to ensure adequate wastewater treatment capacity is available to serve future development projects.

Response 117.11

The commenter cites HCD requirements on parcel size for affordable housing as not exceeding 10 acres. The commenter notes that FOR-2 is 13.5 acres in size, and asks if the County has prepared sufficient documentation for HCD.

The buildout calculations for FOR-2 assumed no more than 10 acres would be set aside as affordable housing, in line with HCD requirements, as discussed in Appendix D of the Housing Element.

Response 117.12

The commenter notes that the Urban Service Area boundary is misleading, and suggests a footnote be added to the map for clarity.

The Urban Service Area boundaries are designated in the General Plan, and are not directly indicative of the exact location of water and sewer infrastructure. The actual location of nearby water and sewer infrastructure for each Rezoning Site is identified in Section 4.18, *Utilities and Service Systems*, and Appendix WSS of the Draft EIR.

Response 117.13

The commenter asserts that any multi-story medium-density development would be inconsistent with the neighborhood surrounding FOR-2, and suggests a correction to the Draft EIR.

The commenter's opinion is noted. The quoted sentence does not provide inaccurate information, and the Draft EIR need not be revised.

Response 117.14

The commenter asserts that the EIR incorrectly states there are no ridgelines or open spaces visible from the neighborhood. The commenter notes that Mount St. Helena, the Santa Rosa foothills, and portions of Trenton hill are visible from Nolan Road and Giusti Road. The commenter requests this be corrected.

The following photograph was taken on April 21, 2023, of FOR-2 facing west from Mirabel Road:

As shown therein, distant views of ridgelines and open spaces are not generally visible across FOR-2. The vegetation located within and surrounding Site FOR-2 prevent distant views of such features.

Response 117.15

The commenter notes that FOR-2 is not flat, but has 2 to 9 percent slopes as stated elsewhere in the report, and requests this statement be corrected.

The following revision has been made on page 4.1-18 of the Draft EIR:

> …Views of the ridgelines and open spaces are not visible from the streets looking across the lot due to existing residential development, relatively flat topography, and mature vegetation on all sides (Figure 4.1-14)….

Response 117.16

The commenter notes mature redwood trees on the property do not block views of surrounding hillsides, and requests this statement be corrected.

Please refer to Response 117.14.

Response 117.17

The commenter notes that FOR-2 is not located across the street from a school and asks for this to be corrected.

The following revision has been made on page 4.1-18 of the Draft EIR:

> On Mirabel Road, the Forestville Youth Park ~~a school~~ is directly across the street from FOR-2.

Response 117.18

The commenter asserts that the density of FOR-2 is 200% greater than the surrounding neighborhood. The commenter suggests that the site sensitivity for FOR-2 be changed from Moderate to Significant.

Please refer to Table 4.1-1 on page 4.1-2 of the Draft EIR. The County's site sensitivity criteria are provided therein. Please note that proposed density is not a factor in site sensitivity. No change to the Draft EIR is required.

Response 117.19

The commenter asserts that the light and glare analysis does not adequately analyze the existing night sky conditions, as the neighborhood surrounding FOR-2 does not contain streetlights. The commenter asserts that visitors come to the area for night sky viewing. The commenter asserts that the second or third story of new buildings would emit light, and the project would increase the instance of vehicle headlights.

Please refer to Section 4.1.6, *Light and Glare*, on page 4.1-44 of the Draft EIR. This section acknowledges the existing light and glare conditions of the Rezoning Sites, including the prevalence of night sky viewing.

Impact AES-4, beginning on page 4.1-37 of the Draft EIR, addresses potential impacts associated with new sources of light and glare. The potential impact related to light spillage from exterior lighting, interior lighting, and vehicle headlights is discussed. Mitigation Measure AES-2 would require exterior lighting to meet certain requirements, which would reduce potential impacts to less than significant.

Response 117.20

The commenter asserts that the EIR should acknowledge the existence of night sky viewing and assess the impact. The commenter asks what additional mitigation is necessary.

Please refer to Response 117.19 regarding the discussion in the EIR of night sky viewing, and light and glare impacts. Additional mitigation is not warranted, as Mitigation Measure AES-2 would reduce this impact to a less than significant level.

Response 117.21

The commenter references the description in the Draft EIR related to the presence of Important Farmland on the Rezoning Sites. The commenter includes the text of County General Plan Goal AR-3, Objective AR-3.1, Goal LU-9, and Objective LU-9.1. The commenter disagrees with the EIR's statement that FOR-2 does not contain productive, prime agricultural lands, as the current landowners assert the parcel is agriculturally important. The commenter asserts that FOR-2 is mapped as Farmland of Local Importance.

CEQA defines Important Farmland as that which is characterized as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Farmland of Local Importance is not considered Important Farmland for the purposes of CEQA analysis. The information provided in the Draft EIR remains accurate and no revisions are required.

Response 117.22

The commenter requests that mitigation for rezoning FOR-2 related to Farmland of Local Importance be identified.

Please refer to Response 117.21. While the site may contain farmland of local importance, CEQA does not consider the conversion of Farmland of Local Importance to non-agricultural use to be a significant impact; thus, no mitigation is required.

Response 117.23

The commenter asserts that the Forestville boundary is not accurate relative to FOR-2 in Figure 4.4-4. The commenter asserts that stormwater runoff affecting biological resources flows north from FOR-2 via drainage ditches, seasonal creeks, and riparian corridors to the Russian River. The commenter asserts that these water ways must be investigated as Critical Habitat and Sensitive Communities. The commenter asks for the Biological Study Area for FOR-2 to be expanded to include downstream waterways.

The Biological Study Areas (BSAs) include the minimum bounding rectangle for all Rezoning Sites in each of the 11 Urban Service Areas, along with a 500-foot buffer to encompass potential impacts to biological resources, as described on page 4.4-1 of the Draft EIR. The commenters request to expand the BSA for Forestville to include features outside this boundary would not be consistent with this methodology.

Impacts related to riparian habitat and wetlands are discussed under Impact BIO-2, beginning on page 4.4-36 and BIO-3, beginning on page 4.4-37.

Critical Habitat and Sensitive Communities are defined by the US Fish and Wildlife Service (USFWS) and/or the California Department of Fish and Wildlife (CDFW). These are described in the Draft EIR beginning on page 4.4-19. Forestville sites are not located within 5 miles of sensitive natural communities. As shown in Table 4.4-5 on page 4.4-21 of the Draft EIR, Forestville sites are located 2.55 miles from Critical Habitat for California tiger salamander, within Critical Habitat for Coho salmon, and 0.16 mile from Critical Habitat for steelhead. Impacts to special-status species and sensitive natural communities are addressed under Impact BIO-1 and Impact BIO-2, respectively.

Response 117.24

The commenter asserts that page 4.4-13 of the Draft EIR does not mention FOR-2's connectivity with the Russian River via stormwater runoff, and asks for this to be corrected.

Page 4.4-13 of the Draft EIR provides a description of the BSA for Forestville. This explanation is not intended to include an exhaustive list of all connective features. Impacts related to riparian habitat and wetlands are discussed under Impact BIO-2, beginning on page 4.4-36 and BIO-3, beginning on page 4.4-37.

Response 117.25

The commenter notes that FOR-2 is located within 0.5 mile of a known Native American cultural site, and asserts that Native American artifacts have been found on FOR-2 and the surrounding area. The commenter requests that the EIR state FOR-2's proximity to the cultural site and disclose the possibility of artifacts and human remains being present on site.

Page 4.5-4 of the Draft EIR explains:

> Due to the programmatic and high-level nature of the Housing Element Update, a records search at the Northwest Information Center has not been conducted. However, archaeological sites are present throughout Sonoma County. Areas most likely to be sensitive for archaeological sites include landforms near fresh water sources.

Therefore, no specific cultural sites were disclosed in the Draft EIR. Additionally, the location of sensitive archaeological resources must be kept confidential for their protection. Impact CUL-2, beginning on page 4.5-13 of the Draft EIR, requires future development facilitated by the project on Rezoning Sites to conduct Phase I Archaeological Resources Surveys pursuant to Mitigation Measure CUL-3. Additional mitigation is included as needed, for projects in proximity to known sites or sensitive areas, including additional required studies, as appropriate.

Potential impacts related to the discovery of human remains are addressed by Impact CUL-3, on page 4.5-16 of the Draft EIR. As stated therein, existing state requirements would ensure the protection of unanticipated discovery of human remains.

Response 117.26

The commenter describes the slope of FOR-2 and mentions flooding in downhill residences from FOR-2. The commenter states that stormwater runoff is not collected in storm drains and describes the path of stormwater downstream of FOR-2. The commenter asserts that the areas collecting stormwater flows to the Russian River should be considered as Critical Habitat and Sensitive Communities. The commenter states that increased impervious surfaces on FOR-2 would increase flooding, and mitigation should be identified. The commenter asserts that stormwater was not adequately analyzed in the Draft EIR.

Please refer to Response 117.23 regarding Critical Habitat and Sensitive Communities. Please refer to Section 4.4.3, beginning on page 4.4-27 of the Draft EIR, related to biological resource impacts. Where necessary, appropriate mitigation measures are required to reduce potential impacts to less than significant.

Please refer to Impact HWQ-3, beginning on page 4.10-26 of the Draft EIR, regarding impacts related to stormwater runoff. As described therein, future development facilitated by the project on Rezoning Sites would be required to comply with state and local laws related to stormwater pollution controls during construction and operation, and impacts would be less than significant.

Please refer to Impact HWQ-4, on page 4.10-28 of the Draft EIR, regarding flood impacts. As stated therein, development facilitated by the project on Rezoning Sites would be required to comply with applicable General Plan policies and County code requirements, ensuring that impacts would be less than significant.

Additionally, page 4.18-3 of the Draft EIR notes: “Most of the Rezoning Sites are not adjacent to curb and gutter storm drains, or stormwater drains following site topography or drainage ditches.”

Response 117.27

The commenter provides excerpts from the Draft EIR related to parks. The commenter notes that there are no publicly-funded parks in Forestville, and asks that the EIR clarify the addition of new park space to serve future residents.

Please refer to Impact PS-4, beginning on page 4.15-19 of the Draft EIR. As discussed therein, the County requires payment of development fees to fund park facilities (per Sonoma County Code Section 20-65) and requires parkland dedication or payment of in lieu fees for residential subdivision projects per Sonoma County Code Sec. 25-58 and 25-58.1, offsetting impacts related to increased demand at existing

recreation facilities, and project applicant(s) of the Rezoning Sites would be required to pay this fee in connection with permitting. The County has not identified a location for new parkland that would serve future Forestville residents, as no development projects on the Forestville sites has been proposed at this time. A condition of a grant from the Agricultural Preservation and Open Space District required the Forestville Downtown Park be dedicated as permanently protected and publicly accessible.

Response 117.28

The commenter notes that Forestville Youth Park and Forestville Downtown Park are owned by non-profits and available for public use. The commenter asks what population boundaries would be used to calculate population and if in-lieu fees would fund the existing privately-owned parks.

The Forestville Downtown Park is operated by a non-profit entity and the land was acquired with substantial contribution of public funds (Sonoma County Agricultural Preservation and Open Space grant). Sonoma County Regional Parks has and will continue to invest in connecting the Downtown Park to the West County Trail. As a condition of the Agricultural and Open Space grant, the Forestville Downtown Park was dedicated as permanently protected and permanently publicly accessible.

Response 117.29

The commenter expresses concerns related to increased use of Forestville Youth Park. The commenter asks what mitigation is in place for parkland degradation. The commenter asks for an analysis of privately-owned parks be added to the EIR.

Please refer to Impact PS-4, beginning on page 4.15-19 of the Draft EIR. As discussed therein, new residents facilitated by the project would increase the demand for park services. The County requires the payment of development fees to fund park facilities (per Sonoma County Code Section 20-65) and requires parkland dedication or payment of in lieu fees for residential subdivision projects per Sonoma County Code Sec. 25-58 and 25-58.1. With implementation of this requirement, impacts were determined to be less than significant, and mitigation is not required. CEQA and the *CEQA Guidelines* do not require an analysis of impacts to private facilities, including privately-owned parks.

Response 117.30

The commenter provides information regarding existing traffic on Mirabel Road. The commenter categorizes Mirabel Road as a Major Collector. The commenter asks that the Draft EIR list Mirabel Road in the Existing Street Network.

Due to the programmatic nature of the project, not all roadways adjacent to each Rezoning Site are listed in subsection *a. Existing Street Network*, beginning on page 4.16-1 of the Draft EIR. Roadways in the vicinity of all Forestville sites that are listed in this section include: State Route 116, Laguna Road, Vine Hill Road, Trenton Road, and Wohler Road. As included in Section 5 of this document, and as discussed below, Mirabel Road has been added to the discussion of the existing street network on page 4.16-5:

Mirabel Road, located north of Forestville, is a north to south collector with one lane in each direction. The road begins at the intersection with Highway 116 and ends at the intersection with River Road.

This addition to the existing setting does not change the impact conclusions in the Draft EIR.

Response 117.31

The commenter calculates daily trips at the Mirabel Road and SR 116 intersection that would be added by the project. The commenter asks the County to address existing congestion issues at this intersection.

Please refer to Appendix TRA to the Draft EIR for the traffic congestion LOS analysis, which is provided for informational purposes only. This study includes the intersection of Front Street (SR 116) and Mirabel Road as one of the study intersections for the LOS analysis. Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion. Please refer to Master Response EXST regarding existing conditions.

Response 117.32

The commenter states that the EIR does not clearly include traffic mitigations for Mirabel Road and SR 116, including a roundabout.

Please refer to Response 117.31 and Master Response TRA regarding traffic congestion. Please refer to Section 4.16, *Transportation*, of the Draft EIR for the CEQA-required traffic analysis, and Appendix TRA for the informational-only LOS analysis.

Response 117.33

The commenter asserts that a traffic study should be required as mitigation for development on FOR-2.

Please refer to Response 117.31 and 117.32.

Response 117.34

The commenter describes existing access to FOR-2, as well as nearby intersections. The commenter notes there are no turn lanes, and sight distances are limited.

Please refer to Master Response EXST regarding existing conditions.

Response 117.35

The commenter asserts that the existing conditions of roadways and intersections surrounding FOR-2 are dangerous.

Please refer to Master Response EXST regarding existing conditions.

Response 117.36

The commenter references and provides excerpts from the Sonoma County Traffic Impact Study Thresholds.

This comment is noted and does not require a response.

Response 117.37

The commenter asserts that the EIR does not sufficiently analyze traffic mitigation measures and the County's plan to extend the Joe Rodota Trail Bike Path. The commenter asks how traffic mitigation will affect the construction of this trail near FOR-2.

The Draft EIR includes two mitigation measures related to transportation impacts, TRA-1 and TRA-2, provided on pages 4.16-16 and 4.16-17 of the Draft EIR. These measures would reduce vehicle miles

traveled during operation of future development facilitated by the project on Rezoning Sites and would minimize construction disruptions to existing traffic flows, respectively. The commenter does not clearly describe how these mitigation measures would result in secondary effects to planned construction in the area. Secondary effects of mitigation measures are discussed in Section 5.3, beginning on page 5-3 of the Draft EIR.

Response 117.38

The commenter asks if the EIR requires traffic signals, turn lanes, or intersection improvements on Mirabel Road and other streets near FOR-2.

The commenter is referring to traffic congestion; please refer to Master Response TRA.

Response 117.39

The commenter asks if there is any mitigation for traffic increases on Giusti Road or Nolan Road.

The commenter is referring to traffic congestion; please refer to Master Response TRA.

Response 117.40

The commenter asserts that the Draft EIR insufficiently analyzes the need for crosswalks near FOR-2. The commenter provides excerpts from the California MUTCD, and Permit Sonoma Pedestrian Policies. The commenter asks what mitigations should be added to the EIR to address road crossing safety.

Please refer to Impacts TRA-1 and TRA-2 regarding impacts to pedestrian facilities and traffic safety. As noted therein, the County of Sonoma's General Plan requires future development to provide safe, continuous, and convenient pedestrian access to local services and destinations. Furthermore, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Impacts to pedestrian facilities or traffic safety were determined to be less than significant.

Response 117.41

The commenter states that the County has been reducing the parking space requirement to increase density and reduce VMT. The commenter asserts that this strategy only works in urbanized areas with robust public transportation. The commenter notes that Forestville is rural with few jobs in walking distance of FOR-2. The commenter quotes page 4.19-26 of the Draft EIR, related to site access.

This comment does not pertain to the analysis provided in the Draft EIR, and the quoted section of the Draft EIR is provided without a comment. No response is required.

Response 117.42

The commenter asserts that the Draft EIR does not sufficiently analyze the lack of street parking near FOR-2. The commenter asks how the EIR will mitigation the issue of sufficient parking and lack of robust public transportation.

Please note that parking is not an issue area required to be evaluated under CEQA. Please refer to Master Response EXST regarding existing infrastructure, including public transportation. The Draft EIR is not required to mitigate existing conditions; therefore, no new mitigation is required.

Response 117.43

The commenter asserts that the Draft EIR does not sufficiently analyze the condition and size of the sewer pipeline serving FOR-2. The commenter describes the location and size of existing pipelines near FOR-2. The commenter notes existing issues with clogs in the pipeline. The commenter cites Sonoma County Water Agency pipeline sizing requirements.

Please refer to Master Response EXST regarding existing conditions. Project impacts related to utilities infrastructure are discussed in Appendix WSS and in Section 4.18, *Utilities and Service Systems*, of the Draft EIR. As noted on page 4.18-14 of the Draft EIR, some "sites would require the construction of expanded wastewater facilities, including upgraded pipeline and potentially new pumps." When future development projects are proposed, necessary facility upgrades would be identified and constructed in compliance with relevant and applicable standards.

Response 117.44

The commenter suggests that the project provide sewer access to the parcels surrounding FOR-2, and asks if the EIR considers this.

Please refer to Master Response EXST regarding the existing conditions at the FOR-2 neighborhood. No wastewater facility upgrades are proposed as a part of this project at this time.

Response 117.45

The commenter asserts that FOR-2 should be added to the flow calculation related to the 6" sewer pipeline on Front Street/SR 116. The commenter asks if the County contacted the Forestville Water District regarding capacity calculations.

Project impacts related to utilities infrastructure are discussed in Appendix WSS and in Section 4.18, *Utilities and Service Systems*, of the Draft EIR. As described in Appendix WSS, Forestville Water District staff were contacted during preparation of the Water and Sewer Study. As no development projects on FOR-2 are proposed at this time, specific necessary capacity upgrades have not yet been identified.

This comment is noted and has been passed on to decision-makers for consideration.

Response 117.46

The commenter suggests that mitigation related to capacity issues related to the reduced size of the sewer line on Mirabel Road and First Street be added.

Please refer to Master Response EXST regarding existing conditions. Mitigation is only required for impacts associated with a proposed project, and are not required to address existing conditions. When future development projects are proposed, necessary facility upgrades would be identified and constructed in compliance with relevant and applicable standards.

Response 117.47

The commenter asks who is responsible for replacing 1000 feet of sewer line under SR 116.

Please refer to Master Response EXST regarding existing conditions. The segment of sewer line referenced by the commenter is associated with the Forestville Water District.

Response 117.48

The commenter notes that traffic backed up on Mirabel Road during recent wildfire evacuations. The commenter asserts that the use of existing egress routes from FOR-2 would hamper future residents ability to evacuate.

Please refer to Master Response EMG regarding emergency access.

Response 117.49

The commenter asserts that the EIR does not provide adequate mitigation for evacuation from FOR-2.

Please refer to Master Response EMG regarding emergency access. As described therein:

> Development facilitated by the project on Rezoning Sites would be constructed in accordance with federal, state, regional, and local requirements, which are intended to ensure the safety of county residents and structures to the extent feasible. Compliance with these standard regulations would be consistent with the County's Emergency Operations Plan. The project would not impair an emergency response or emergency evacuation plan and impacts would be less than significant.

Therefore, mitigation is not warranted.

Response 117.50

The commenter asserts that a significant and unavoidable impact to public safety is unacceptable. The commenter asserts that the project should not continue. The commenter asserts that the EIR should evaluate wildfire risk based on recent wildfire knowledge. The commenter asserts that Moderate and High FHSZs are identical in the vicinity of FOR-2.

The commenter's opinion is noted and has been passed on to decision-makers for consideration.

Please refer to Section 4.19 of the Draft EIR. Recent wildfire activity in Sonoma County is described on page 4.19-1, and was considered as part of the existing setting for the impact analysis. Please refer to Impact WFR-2 regarding potential wildfire impacts associated with future development of the Rezoning Sites, including those that are within or near Moderate, High, or Very High FHSZs.

Response 117.51

The commenter asks that FOR-2 be removed from the Housing Element Update List based on identified significant and unavoidable wildfire impacts.

The commenter's opinion is noted and passed on to decision-makers for consideration.

Response 117.52

The commenter identifies the nearest FHSZs to FOR-2 and provides a short excerpt from the EIR. The commenter asks how road improvements and traffic mitigation measures are funded to meet road width requirements.

Please also refer to Master Response EXST regarding existing conditions of infrastructure. Future development facilitated by the project on Rezoning Sites would need to confirm that adjacent roads meet County width requirements. The County collects countywide traffic development fees pursuant to Article 98 of Chapter 26 of the Sonoma County Code. The payment of these fees by each individual project would contribute to alleviating cumulative roadway deterioration impacts to the regional road network.

Response 117.53

The commenter references and summarizes an attached letter from Karyn Pulley. The commenter asks if it is the County's best interest to rezone a property against the landowner's wishes.

The letter from Karyn Pulley is included as EIR Public Comment 77 and Response 77.1 through Response 77.6 address the comments provided therein.

The commenter's question is noted and passed on to decision-makers for consideration.

Response 117.54

The commenter asks if there is a process to remove a property from the Housing Element Update.

Decision-makers will ascertain if certain properties should be removed from the Housing Element Update. This comment has been passed on to decision-makers for consideration.

EIR Public Comment 118

COMMENTER: Lorin and Rebecca McClendon

DATE: February 10, 2023

Response 118.1

The commenter expresses opposition for proposed development in Forestville and expresses concerns regarding transportation and increased population in the area. The commenter states that they agree with Lynda Hopkins reasons for opposing the project. The commenter states that they support affordable housing in cities with adequate infrastructure.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Section 4.15, *Public Services and Recreation*, and Section 4.18, *Utilities and Service Systems,* of the Draft EIR for a full analysis of infrastructure in the project area and the proposed project impacts.

EIR Public Comment 119

COMMENTER: Mark Dutina

DATE: February 10, 2023

Response 119.1

The commenter states that their property backs up to site FOR-2.

This comment has been noted.

Response 119.2

The commenter asks if crossing lights will be placed to cross Mirabel Road and Giusti Road.

Please refer to Master Response TRA regarding traffic congestion. The County conducts signal warrant analyses and updated traffic counts when identified by engineering staff as being in need of improvements. The County uses Caltrans and California Manual on Uniform Traffic Control Devices (CA MUTCD) signal warrant criteria.

Response 119.3

The commenter asks what precautions will be made for properties adjacent to FOR-2 and expresses concerns regarding dust and noise pollution.

Regarding dust exposure, please refer to Section 4.3, *Air Quality,* of the Draft EIR. As discussed therein, under Impact AQ-2 on page 4.3-16, impacts related to fugitive dust would be less than significant with the implementation of mitigation measure AQ-1 and AQ-2. As discussed under Impact AQ-3 on page 4.3-22, impacts related to toxic air contaminants (TACs) would be less than significant.

Regarding noise pollution, please refer to Section 4.13, *Noise,* of the Draft EIR for a full analysis of potential noise impacts and mitigation measures. Development facilitated by the proposed project on Rezoning Sites would be required to implement Mitigation Measures NOI-1 through NOI-7 in order to ensure that all construction and operational noise will comply applicable County standards and reduce all noise impacts to a less than significant level.

Response 119.4

The commenter expresses concerns regarding adequate police protection for the rezoning sites.

Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. As discussed therein, under Impact PS-2 on page 4.15-12, the proposed project will not require the development of additional police facilities and police service ratios and response times will remain adequate. Thus, impacts to police service and facilities was determined to be less than significant.

Response 119.5

The commenter asks if traffic lights will be added at River Road and Highway 116.

Please refer to Master Response TRA regarding traffic congestion. Please refer to Master Response EXST regarding existing conditions. Please refer to Impact TRA-2, beginning on page 4.16-18 of the Draft EIR, regarding traffic safety impacts associated with development facilitated by the proposed project on Rezoning Sites.

Response 119.6

The commenter asks about which public services including stores, medical services and employment opportunities will be available for new residents facilitated by the rezoning sites.

This comment does not pertain to the environmental impact analysis presented in the Draft EIR. The services listed by the commenter do not require evaluation under CEQA.

Response 119.7

The commenter asks about parking availability for new residents facilitated by the rezoning sites and expresses concerns about safety.

Please note that parking is not an issue area that is required to be evaluated under CEQA. Regarding safety, please refer to Impact TRA-2 in Section 4.16, *Transportation,* of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

Response 119.8

The commenter expresses concerns about biological resources including birds and mammals.

Please refer to Section 4.4, *Biological Resources,* for a full analysis of potential impacts to biological resources induced by the proposed project. The species listed by the commenter are not listed as special-status species. Nesting birds are addressed under Impact BIO-1, beginning on page 4.4-28 of the Draft EIR.

Response 119.9

The commenter states that the current owners intend for the rezoning site to remain an agricultural property.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 119.10

The commenter asks if environmental tasks described in the DEIR have been considered before the rezoning site is developed.

The commenter does not specify the environmental tasks they are referring to. Mitigation Measures presented within the Draft EIR would be implemented.

Response 119.11

The commenter expresses concerns regarding water and sewer and asks if the use of septic is planned for the project.

This comment has been noted. Please refer to Master Response UTIL regarding utility availability. Septic is not proposed for any of the Rezoning Sites.

Response 119.12

The commenter asks if the County will reimburse the commenter if they sell their property at a loss and requests that site FOR-2 be removed from the project.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes property values. Please refer to Master Response HE in regard to opposition of the Housing Element or selected Rezoning Sites.

EIR Public Comment 120

COMMENTER: Kathy Rodrigues

DATE: February 14, 2023

Response 120.1

The commenter asks if the Forestville rezoning sites will be visible from Highway 116. The commenter expresses concern regarding adequate improvements to Highway 116 and Mirabel Road. The commenter notes existing issues with sidewalks and curbs in Forestville.

As discussed under Impact AES-2, several Rezoning Sites in Forestville border a state scenic highway and scenic resources could be affected if individual projects are visible from these roadways. However, there is no feasible mitigation measures available, as development facilitated by the proposed project on Rezoning Sites cannot be made to comply with subjective design guidelines, and thus projects on these ten sites may remove or damage scenic resources within a State-designated highway, particularly by changing the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Please refer to Master Response EXST regarding existing conditions of roadways, sidewalks, and curbs. Please refer to Master Response TRA regarding traffic congestion.

Response 120.2

The commenter requests additional time for public review. The commenter states that there is no school on Mirabel Road near site FOR-2, but Forestville Youth Park is in that area.

The Draft EIR was made available for public review for a 55-day comment period that began on December 28, 2022 and ended on February 23, 2023. *CEQA Guidelines* Section 15105(a) require EIRs to be circulated for at least 30 days and no longer than 60 days, except under unusual circumstances. Therefore, the Draft EIR was circulated for an appropriate amount of time, and no circumstances warrant a longer public review period.

The commenter is correct. Page 4.1-18 of the Draft EIR is revised as follows:

> On Mirabel Road, the Forestville Youth Park ~~a school~~ is directly across the street from FOR-2.

This change to the existing setting description does not affect the aesthetics analysis that follows.

EIR Public Comment 121

COMMENTER: **Mike Bojanowsk**

DATE: February 10, 2023

Response 121.1

The commenter states that site LAR-9 is in a flood zone and states that the parcel flooded in 1995 and 2005.

The commenter is correct, and Figure 4.10-9, which shows that LAR-9 is partially within both a 100-year and 500-year flood zone has been added to the Draft EIR. These revised figures are included in Section 5 of this document. Additionally, the following revisions have been made throughout Section 4.10 of the Draft EIR to reflect inclusion of LAR-9 in the flood analysis:

On page 4.10-9:

> As shown therein, the following sites are partially within the 100-year floodplain: GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, ~~and~~ PEN-9, and LAR-9.

On page 4.10-29:

> As stated in Section 4.10.1, *Environmental Setting*, the following Rezoning Sites are partially within a 100-year flood hazard area: GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, ~~and~~ PEN-9, and LAR-9.

Even with the revisions made to the Draft EIR regarding LAR-9, as discussed in Impact HWQ-3 and HWQ-4, impacts related to flooding would be less than significant.

Response 121.2

The commenter expresses concerns about the Mark West Creek setback and states that the setback would restrict development on nearly the entire property.

LAR-9 is currently zoned with a required setback of 50 feet from Mark West Creek for development. The entire parcel is 3.04 acres and Mark West Creek crosses the southern portion of the parcel. Even with the required 50-foot setback, there still would be adequate space for development on the site.

Response 121.3

The commenter expresses concerns about parking, emergency vehicle access, and traffic near Fulton Road.

Parking is not considered an environmental impact and is not required to be analyzed under CEQA. Please refer to Master Response EMG for a discussion of emergency vehicle access. Please refer to Master Response TRA regarding traffic congestion.

EIR Public Comment 122

COMMENTER: Mona Behan and Alan Crisp

DATE: February 10, 2023

Response 122.1

The commenter expresses concerns about the potential for development facilitated by the project to increase the population in Forestville.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 122.2

The commenter expresses concerns about impacts to traffic, schools, water resources, parks, wildlife, and wildfire.

Please refer to Master Response TRA regarding traffic congestion. Please refer to Section 4.4, *Biological Resources,* of the Draft EIR for a full analysis of impacts to biological resources. Please refer to Section 4.15, *Public Resources and Recreation,* of the Draft EIR for an analysis of impacts regarding schools and parks. Please refer to Section 4.10, *Hydrology and Water Quality,* and Section 4.18, *Utilities and Service Systems,* for additional information on impacts to water resources. Please refer to Section 4.4, *Biological Resources,* of the Draft EIR for a full analysis of impacts to biological resources. Please refer to Section 4.19, *Wildfire,* of the Draft EIR and Master Response FIRE for additional information regarding wildfire risk.

Response 122.3

The commenter expresses concerns about infrastructure costs pertaining to sewer lines, sidewalks, roads, and traffic features.

Costs of the improvements the commenter listed are not required to be discussed in the Draft EIR. Please refer to Master Response UTIL regarding impacts to current infrastructure including sewer infrastructure. Please refer to Master Response TRA regarding traffic congestion and congestion-related roadways improvements.

Please refer to Impact TRA-2 in Section 4.16, *Transportation,* of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

Response 122.4

The commenter expresses concerns about access to public transportation, grocery stores, and employment opportunities.

This comment has been noted. Access to grocery stores and employment are not issue areas required to be analyzed under CEQA. Please refer to Section 4.16, *Transportation*, in the Draft EIR for a discussion of public transit. As stated therein under Impact TRA-1 on page 4.16-15 impacts to public transit facilities would be less than significant. Additionally, please refer to Master Response EXST regarding existing conditions on and near the rezone sites.

Response 122.5

The commenter acknowledges the need for more affordable housing in the area and requests that sites be chosen with regard for local character and equity. The commenter questions the site selection process and how the number of sites was determined.

This comment has been noted. Please refer to Master Response SITE regarding Rezoning Site selection.

Response 122.6

The commenter states that the owners of FOR-2 do not want to sell the land or have it rezoned; they'd like to keep it in their family and used for agricultural purposes.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

EIR Public Comment 123

COMMENTER: Nancy Dempster

DATE: February 10, 2023

Response 123.1

The commenter expresses concerns about the potential for development facilitated by the project to increase the population in Forestville.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Master Response EXST regarding the existing conditions in Forestville.

Response 123.2

The commenter states that they would like to see a balance of low-income housing while preserving many of the existing qualities in the area.

This comment has been noted. Please refer to Master Response SITE for information regarding Rezoning Site selection. Please note that the Draft EIR did consider an alternative where fewer sites would be rezoned (refer to Alternative 3 on page 6-12), and considered but rejected an alternative that would apply a lower density to the Rezoning Sites (refer to page 6-18).

Response 123.3

The commenter expresses concern regarding traffic, safety, and pollution from cars.

Please refer to Master Response TRA regarding traffic congestion.

Regarding safety, please refer to Impact TRA-2 in Section 4.16, *Transportation,* of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

Regarding vehicle pollution, please refer to Section 4.3, *Air Quality,* of the Draft EIR. As discussed therein on page 4.3-16, the project's VMT increase would not conflict with the BAAQMD's 2017 *CEQA Air Quality Guidelines* operational plan-level significance thresholds for criteria air pollutants, and would be consistent with the 2017 Clean Air Plan. Therefore, air quality impacts related to additional vehicle miles travelled would be less than significant.

As discussed therein, California has implemented various measures to improve air quality and reduce exposure to traffic emissions. These include the Diesel Risk Reduction Plan, which aims to reduce particulate matter emissions from diesel vehicles. The continued electrification of California's vehicle fleet would also reduce $PM_{2.5}$ levels, and ongoing efforts to reduce emissions from cars and trucks and to move vehicles towards "zero emission" alternatives will continue to drive down traffic pollution (CARB 2017).

Response 123.4

The commenter expresses concern regarding emergency evacuation routes.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation.

Response 123.5

The commenter expresses concern regarding traffic on Highway 116 resulting from development facilitated by sites FOR-5 and FOR-6 and sewer line capacity to site FOR-2.

This comment has been noted. Please refer to Master Response TRA regarding traffic congestion, and Master Response UTIL regarding sewer system capacity.

Response 123.6

The commenter expresses concern regarding sewer line capacity to site FOR-2.

This comment has been noted. Please refer to Master Response UTIL regarding utility availability.

EIR Public Comment 124

COMMENTER: Robert Davis

DATE: February 10, 2023

Response 124.1

The commenter expresses concerns about the potential for development facilitated by the project to increase the population in Forestville.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 124.2

The commenter expresses concern regarding water and sewer capacity and infrastructure including roads and services.

This comment has been noted. Please refer to Master Response UTIL regarding utility availability. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 124.3

The commenter states that there is no school on Mirabel Road near site FOR-2, but a park maintained by the community is in that area. The commenter states that *the unpaved road off Van Keppel described in the Draft EIR is actually a private driveway.*

Regarding the comment on there not being a school located on Mirabel Road, commenter is correct. Page 4.1-18 of the Draft EIR is revised as follows:

On Mirabel Road, the Forestville Youth Park ~~a school~~ is directly across the street from FOR-2.

Page 4.1-18 of the Draft EIR has also been revised to reflect the private driveway as follows:

FOR-4 is situated east of FOR-1 in an area accessible only by ~~unpaved road~~sa private driveway off Van Keppel Road.

This change to the existing setting description does not affect the aesthetics analysis that follows.

EIR Public Comment 125

COMMENTER: Vikki Miller

DATE: February 10, 2023

Response 125.1

The commenter expresses concerns about the potential for development facilitated by the project to increase the population in Forestville.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 125.2

The commenter expresses concern regarding water and sewer capacity and infrastructure including roads and services.

This comment has been noted. Please refer to Master Response UTIL regarding utility availability.

Response 125.3

The commenter expresses concerns regarding the road conditions of Mirabel Road.

This comment has been noted. Please refer to Master Response EXST regarding the existing condition of services and infrastructure.

Response 125.4

The commenter expresses concerns regarding drug and alcohol abuse.

This comment is noted; however, it does not pertain to CEQA analysis in the EIR.

Response 125.5

The commenter expresses concern regarding emergency evacuation routes.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation.

Response 125.6

The commenter expresses concern regarding infrastructure capacity.

This comment has been noted. The commenter does not specify the type of infrastructure they are referring to. Please refer to Master Response EXST regarding the existing condition of services and infrastructure.

Please refer to Master Response UTIL and Section 4.18, *Utilities and Service Systems,* for information regarding wastewater, storm drainage, electricity, gas, water supply, and solid waste facilities. Please refer to Section 4.15, *Public Services and Recreation,* for additional information on impacts to fire protection facilities, police protection facilities, schools, parks, and other public service facilities.

Response 125.7

The commenter expresses concern regarding infrastructure capacity and availability of services, and opines that a housing project would be better in a more urban setting rather than in Forestville on Mirabel Road and Hwy 116 (FOR-7).

Please refer to Responses 125.3 and 125.6, above. Additionally, the Rezoning sites are currently under consideration for rezoning, and FOR-7 is not a Rezoning Site. Individual development proposals may, but are not guaranteed, to follow after rezoning. Also, note that the EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. More urban areas in the County, such as the incorporated cities and town of Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements. Sonoma County must zone sites in the unincorporated areas for housing, so by necessity the project looks at unincorporated communities. Refer to Master Response SITE for more information on site selection.

EIR Public Comment 126

COMMENTER: Adele Turk

DATE: February 10, 2023

Response 126.1

The commenter states that Forestville on Guisti Road (near FOR-2) lacks road access, sidewalks, sewer connections, and streetlights. The commenter states that grocery stores and the hospital are not easily accessible. The commenter states that heavy equipment trucks from the rock quarry and cars utilize Highway 116.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Response 123.3 for additional information regarding traffic, traffic safety, and pedestrian safety.

Response 126.2

The commenter opposes the project. The commenter suggests moving Rezoning Sites closer to a bugger town.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites. Please refer to Master Response SITE regarding Rezoning Site selection.

EIR Public Comment 127

COMMENTER: Alice Horowitz

DATE: February 11, 2023

Response 127.1

The commenter expresses opposition to the Rezoning Sites located in Glen Ellen stating that the project is inconsistent with the intent of the Glen Ellen policies established in the General Plan and Glen Ellen Development and Design Guidelines.

This comment is noted. Please refer to master response HE.

Response 127.2

The commenter states that the Draft EIR does not consider the SDC Specific Plan or Hanna Center housing, hotel, and commercial development on Arnold Road. The commenter states these projects were not included in the cumulative impacts for transportation, land use, greenhouse gas emissions, visual resources, public services (specifically water and wastewater), wildfire evacuation, or emergency response.

Please refer to page 4.2 of the Draft EIR for a full discussion of how cumulative impacts were analyzed for this project as required by *CEQA Guidelines* section 15130. Refer also to Response 70.6 regarding cumulative analysis.

Response 127.3

The commenter asks how Arnold Drive is supposed to accommodate increased traffic and emergency evacuation.

Please refer to Master Response EMG for a discussion of evacuation impacts. Please refer to Section 4.16: Transportation of the Draft EIR for a full discussion of transportation impacts. Please refer to comment 123.3 for an explanation as to why traffic impacts are no longer analyzed under CEQA.

Response 127.4

The commenter asks the County to consider removing the two Glen Ellen Rezoning Sites and assign an alternative zone district that does not require a minimum number of units, as required by the WH zone.

This comment is noted. Please refer to master response HE.

EIR Public Comment 128

COMMENTER: Anna Narbutovkih

DATE: February 11, 2023

Response 128.1

The commenter opposes the proposed multi-family housing development in Guerneville located at 14156 Sunset Avenue (GUE-1). The commenter expresses concern about a narrow one-lane road and safety concerns regarding road conditions.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Regarding safety, please refer to Impact TRA-2 in Section 4.16, *Transportation,* of the Draft EIR. Impact TRA-2 discusses whether the project would substantially increase hazards, and as stated therein, "[t]he design of development facilitated by the project on Rezoning Sites is not known at this time. Each development project would be reviewed by the County and required to be consistent with appropriate regulations and design standards set forth by applicable plans, programs, and policies." This impact would be less than significant.

Response 128.2

The commenter opposes short term vacation rental permits.

This comment is noted; however, it does not pertain to CEQA analysis in the Draft EIR.

Response 128.3

The commenter expresses concerns regarding environmental impacts, carbon emissions, pollution, forestry resources, and biological resources. The commenter recommends inventorying existing buildings that can be repurposed and refurbished.

Please refer to the Draft EIR for a full analysis of environmental impacts induced by the proposed project. Please refer to Section 4.3, *Air Quality,* and Section 4.8, *Greenhouse Gas Emissions,* of the Draft EIR for an analysis of impacts to air quality and emissions. Please refer to Section 4.2, *Agriculture and Forestry,* for additional information regarding impacts to forest resources. Please refer to Section 4.4, *Biological Resources,* for an analysis of the project's impacts to biological resources.

The recommendation made by the commenter has been noted and passed onto decision-makers.

EIR Public Comment 129

COMMENTER: Becky Boyle

DATE: February 11, 2023

Response 129.1

The commenter expresses concerns regarding health pertaining to properties near wastewater treatment facilities. The commenter asks how the system will accommodate future needs.

This comment has been noted. Please refer to Master Response UTIL regarding wastewater treatment capacity impacts. Regarding potential impacts of residents near a treatment plant, CEQA focuses on disclosing the environmental effect of a proposed project on the environment (in this case, the adoption of the Housing Element), rather than the effects of the environment on potential future residents.

Response 129.2

The commenter shares an article about a hydrogen sulfide warning near the Crockett wastewater treatment plant. The commenter shares two links about the health risks of airborne pollutants from wastewater treatment plants.

This comment is regarding employees of wastewater treatment plants and is not relevant to the environmental impact analysis for the proposed project. This comment has been noted.

EIR Public Comment 130

COMMENTER: Becky Boyle

DATE: February 11, 2023

Response 130.1

The commenter shares an image of a commercial truck width requirement from the Surface Transportation Act of 1982.

This comment is noted. It does not pertain specifically to analysis in the EIR.

Response 130.2

The commenter opposes the rezone of a parcel at 6090 Van Keppel. The commenter questions how future residents could access the rezoning site. The commenter expresses concerns about emergency evacuation routes.

Please refer to Master Response HE regarding opposition to selected Rezoning Sites and Master Response EMG regarding emergency evacuation.

Regarding resident access, please note that access to future development at the rezoning site will be designed and decided on when development has been proposed and approved for the site. At this time, no development has been proposed so an exact description of what site access will look like cannot be provided.

EIR Public Comment 131

COMMENTER: Becky Boyle

DATE: February 11, 2023

Response 131.1

The commenter requests clarification regarding parcel APN #083-073-010 (FOR-4) and states that the Draft EIR reports it as 6090 Van Keppel Road, while the Zoning and Parcel Report list it as 6325 Van Keppel Rd. The commenter also requests clarification regarding a feature in the Zoning and Parcel report.

Both addresses are associated with FOR-4 (APN 083-073-010); however, in January 2023, the owner requested an address correction from 6090 Van Keppel Road to 6325 Van Keppel Road. A footnote has been added to Table 2-2 of the Draft EIR to reflect this information.

The light grey line referenced by the commenter is a topographic line, indicating elevation.

EIR Public Comment 132

COMMENTER: C.L. Tree

DATE: February 11, 2023

Response 132.1

The commenter expresses concerns about the need for more grocery stores and questions how road conditions and pedestrian access will change on Mirabel Road.

In regard to the comment about the need for grocery stores, this comment has been noted. Please refer to Master Response EXST regarding existing services and infrastructure.

Appendix TRA of the Draft EIR includes an LOS-based congestion analysis for informational purposes. As shown in Appendix TRA of the Draft EIR, traffic volumes in Forestville were calculated for the Front Street (Hwy 116)/Mirabel Road intersection. As shown in the informational analysis provided in Appendix TRA, full buildout of the Forestville and Guerneville Rezoning Site could degrade roadway level of service (LOS) operations to LOS E, and the intersection also meets the peak hour signal warrant for signalization. The improvement measure provided for informational purposes is program-related development to fund the construction of a traffic signal or roundabout at the intersection, either of which would result in the intersection operating at LOS B conditions in both the AM and PM peak hours.

Regarding safety, please refer to Impact TRA-2 in Section 4.16, *Transportation,* of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

EIR Public Comment 133

COMMENTER: C.L. Tree

DATE: February 11, 2023

Response 133.1

The commenter expresses concerns about existing road conditions at Mirabel Road including the lack of sidewalks and traffic lights at Mirabel Road & Front Street, and Covey and Front Street.

Please refer to Response 132.1, above.

EIR Public Comment 134

COMMENTER: C.L. Tree

DATE: February 11, 2023

Response 134.1

The commenter expresses concerns about traffic at Mirabel Road and River Road, parking availability and access for emergency vehicles.

Regarding traffic, please refer to Response 132.1, above. Please note that parking is not an issue area required to be analyzed under CEQA. Please refer to Section 4.16, *Transportation,* of the Draft EIR. As discussed under Impact TRA-3 beginning on page 4.16-18, compliance with Mitigation Measure WFR-1 and WFR-2, 2019 California Building Code, and relevant portions of the Sonoma County Fire Safety Ordinance would reduce impacts regarding emergency access to a less than significant level.

EIR Public Comment 135

COMMENTER: Cheryl A. Franzini

DATE: February 11, 2023

Response 135.1

The commenter states that the proposed rezoning of parcels # 054-290-057 and # 054-290-084 (GLE-1 and GLE-2) is inconsistent with Glen Ellen Development Guidelines. The commenter expresses concerns about tree removal. The commenter requests for the removal of GLE-1 and GLE-2 from the rezoning sites inventory.

This comment is noted. Please refer to Master Response HE. In regards to tree removal, please refer to Impact BIO-5 on page 4.4-39 of the Draft EIR.

EIR Public Comment 136

COMMENTER: Francisco Saiz, Norma Saiz, Richard Halgren, Julie Clark, Gino Franceschi, and Karen Franceschi

DATE: February 11, 2023

Response 136.1

The commenter expresses concerns regarding adequate infrastructure and light pollution.

Please refer to master Response UTIL for a discussion of impacts related to utility infrastructure. Please refer to section 4.1: *Aesthetics* in the Draft EIR for a discussion of light and glare impacts. As discussed therein, impacts related to light and glare would be less than significant with incorporation of mitigation measure AES-2 (found on page 4.1-58 of the Draft EIR) which would require development facilitated by the project on Rezoning Sites to meet exterior lighting requirements to reduce light and glare.

Response 136.2

The commenter expresses concerns regarding safety at schools near sites FOR-1 and FOR-4 and questions how construction hazards including the use or transport of hazardous materials near schools will be addressed.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects (such as security) of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes school security measures. In regards to the transport of hazardous material near schools, please refer to section 4.9: *Hazards and Hazardous Materials* in the Draft EIR. As stated therein, under Impact HAZ-1 on page 4.9-10, impacts related to the emissions or transport of hazardous materials within 0.25 miles of a school would be less than significant. Access to Rezoning Sites is dependent on site-specific development proposals that may be facilitated by the project. Individual development proposals would be reviewed by the County once submitted.

Response 136.3

The commenter states that the road used to access site FOR-4 is small and floods when it rains.

Please refer to Section 4.10, *Hydrology and Water Quality*, in the Draft EIR for a discussion of flood hazards. As shown in Figure 4.10-4 on page 4.10-10, Forestville does not contain any rezone sites that are within FEMA 100-year or 500-year flood zones. Refer also to Master Response EXST regarding existing conditions regarding the existing road, access, and drainage.

Response 136.4

The commenter opines that the Housing Element Update does not adequately address measures to prevent significant environmental and human impacts. The commenter expresses concerns regarding open space, transportation and traffic, infrastructure, parking, and public services.

Please refer to table 4.11-2 of the EIR, which discusses consistency with General Plan policies regarding open space. Refer also to Section 4.15, *Public Services and Recreation*. As discussed therein under Impact PS-4, impacts to parks and recreational facilities would be less than significant. Additionally, as

discussed therein, impacts to fire and police services would be less than significant. As discussed in Section 4.16, *Transportation*, on page 4.16-15, impacts to transit systems would be less than significant. In regards to adequate infrastructure, please refer to Master Response UTIL and Master Response EXST. In regards to parking, pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes parking impacts.

EIR Public Comment 137

COMMENTER: Joseph and Deborah Votek

DATE: February 11, 2023

Response 137.1

The commenter requests the removal of sites GLE-1 and GLE-2 from the rezoning sites inventory and states that the proposed rezoning of sites GLE-1 and GLE-2 is inconsistent with Glen Ellen Development Guidelines.

This comment is noted. Please refer to Master Response HE and Response 70.3.

EIR Public Comment 138

COMMENTER: Kate Farrell

DATE: February 11, 2023

Response 138.1

The commenter expresses concerns regarding two potential rezoning parcels in Glen Ellen. The commenter expresses concerns regarding evacuation routes, infrastructure, water supply, and public services including police and fire services and schools.

Please refer to Master Response EMG for a discussion of emergency access and evacuation routes. Please refer to Master Response UTIL and Master Response EXST for a discussion of infrastructure impacts. Please refer to section 4.18, *Utilities and Service Systems*, in the Draft EIR for a discussion on water supply. As stated therein, on page 4.18-13 Rezoning Sites in Glen Ellen would have adequate access to water supply and impacts would not be significant. As discussed in Section 4.15, *Public Services and Recreation*, in the Draft EIR impacts to police services, fire services, and schools would also be less than significant.

Response 138.2

The commenter states that cumulative projects in the area were not considered including 20 homes proposed for the Sonoma Developmental Center site, the recent development on the north side of Carquinez, or the newly proposed building of 660 units and a hotel across from Hanna Boys Center.

Please refer to Response 70.6 for a discussion of cumulative impacts and the approach taken in the Draft EIR as required by CEQA.

EIR Public Comment 139

COMMENTER: Larry Loebig

DATE: February 11, 2023

Response 139.1

The commenter expresses concerns regarding summer traffic and fire evacuation routes near rezoning site FOR-2.

Please refer to Master Response EMG regarding emergency access and evacuation routes. Please refer to comment O-2.7 for an explanation as to why traffic impacts are no longer analyzed as part of CEQA.

EIR Public Comment 140

COMMENTER: Larry Loebig

DATE: February 11, 2023

Response 140.1

The commenter expresses concerns regarding sidewalks, public transportation, and pedestrian access to public services near rezoning site FOR-2.

Please refer to Response 153.1 for a discussion of pedestrian safety measures included in the Draft EIR. As discussed in Section 4.16, *Transportation,* on page 4.16-15 of the Draft EIR, impacts to public transit facilities would be less than significant.

EIR Public Comment 141

COMMENTER: Larry Loebig

DATE: February 11, 2023

Response 141.1

The commenter expresses concerns regarding water and sewer services near site FOR-2.

Please refer to Master Response UTIL. In addition, please refer to Section 4.18, *Utilities and Services Systems,* of the Draft EIR. As stated on page 4.18-14, each wastewater service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide wastewater service to the Rezoning Sites. With the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites would have access to adequate wastewater service.

EIR Public Comment 142

COMMENTER: Larry Loebig

DATE: February 11, 2023

Response 142.1

The commenter expresses concerns regarding electricity infrastructure and potential impacts regarding fire hazard near rezoning sites FOR-2 through FOR-7. The commenter asks how energy infrastructure may impact fire hazards, and how any hazards will be mitigated.

As discussed in Section 4.6, *Energy,* beginning on page 4.6-11, development facilitated by the project on Rezoning Sites would consume approximately 216,623,500 kilowatt-hours (kWh), or 56,719 millions of British thermal units (MMBtu) per year of electricity for lighting and large appliances, and approximately 86,468,600 thousands of British thermal units (kBtu), or 86,469 MMBtu per year of natural gas for heating and cooking (see Appendix AQ for CalEEMod results). Electricity would be provided by on-site solar, Sonoma Clean Power (SCP) (the default electricity provider in the County), and/or PG&E. SCP provides electricity from cleaner power sources with lower GHG emissions than PG&E, although customers can opt out of SCP service and be provided electricity from PG&E. Development facilitated by the project on Rezoning Sites would also be required to comply with the latest version of CalGreen which would require efficient household fixtures and energy efficiency measures.

Please refer to Master Response FIRE regarding wildfire. Additionally, as stated on page 4.18-3 of the Draft EIR: “Existing overhead power lines are in the vicinity of all Rezoning Sites, except SAN-6 and SAN-7, where power lines are undergrounded.” Therefore, new powerlines, which could potentially exacerbate wildfire risk, are not a part of the project.

EIR Public Comment 143

COMMENTER: Larry Loebig

DATE: February 11, 2023

Response 143.1

The commenter expresses concerns regarding access to gas station services. The commenter questions how the gas station near rezoning sites FOR-2 through FOR-7 will accommodate an increase in population facilitated by the project.

Gasoline usage estimates are provided in Impact ENR-1, beginning on page 4.6-9 of the Draft EIR. As described therein, "vehicle fuel consumption resulting from the project would not be wasteful, inefficient, or unnecessary." CEQA does not require an analysis of gasoline station overcrowding. This comment has been noted and passed on to decision-makers for consideration.

EIR Public Comment 144

COMMENTER: Larry Loebig

DATE: February 11, 2023

Response 144.1

The commenter expresses concerns regarding electricity infrastructure and potential impacts regarding fire hazard near rezoning sites FOR-2 through FOR-7. The commenter questions how potential fire hazards will be mitigated.

Refer to Response 142.1 and Master Response FIRE.

EIR Public Comment 145

COMMENTER: Nina Rosen

DATE: February 11, 2023

Response 145.1

The commenter expresses opposition for development facilitated by the project.

The commenter's opposition to the project is noted and will be passed on to decision-makers for review. Refer to Master Response SITE and Master Response HE.

EIR Public Comment 146

COMMENTER: Richard Evangelisti

DATE: February 11, 2023

Response 146.1

The commenter states that the community surrounding Laughlin Road in Guernerville opposes the rezoning of GUE-2, GUE-3, and GUE-4.

Refer to Response 14.1.

Response 146.2

The commenter expresses concerns regarding utility availability and evacuation routes near rezoning sites GUE-2 and GUE-3.

Refer to Response 14.2.

Response 146.3

The commenter expresses concerns regarding water and sewer services near rezoning sites GUE-2 and GUE-3.

Refer to Response 14.3.

Response 146.4

The commenter states that rezoning sites GUE-2, GUE-3, and GUE-4 are within high fire hazard zones, floodplains, and earthquake risk areas and are zoned as subject to high susceptibility to liquefaction. The commenter states that building in high fire zones and floodplains is contrary to the County General Plan.

Refer to Response 14.4.

Response 146.5

The commenter expresses concerns regarding scenic resources and the potential removal of Redwood and Oak trees.

Refer to Response 14.5.

Response 146.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 146.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 147

COMMENTER: Rodney E. O'Neal

DATE: February 11, 2023

Response 147.1

The commenter expresses their support for more affordable housing in Forestville and opposition to vacation rentals.

This comment is noted and will be passed on to decision-makers.

EIR Public Comment 148

COMMENTER: Rory Pool

DATE: February 11, 2023

Response 148.1

The commenter expresses their concern regarding traffic Carquinez Avenue, including cumulative traffic from the Sonoma Developmental Center. The commenter opposes the removal of mature trees facilitated by the project.

Please refer to Master Response TRA for an explanation as to why traffic congestion is no longer an issue analyzed as part of CEQA. The comment regarding removal of mature trees is noted. Please refer to Impact BIO-5 on page 4.4-39 of the Draft EIR. As stated therein, the project would be subject to the County's ordinances and requirements protecting biological resources such as trees and impacts would be less than significant. Refer to Response 70.6 regarding cumulative effects.

EIR Public Comment 149

COMMENTER: Stacie Gradney

DATE: February 11, 2023

Response 149.1

The commenter expresses their concern regarding water and rural roads. The commenter states that Analy is the only high school. The commenter questions whether the elementary schools have adequate capacity to accommodate a population increase.

Please refer to Master Response UTIL and Master Response EXST. Additionally, please refer to response 46.2 regarding impacts to water supply.

Please refer to Section 4.15, *Public Services and Recreation*, for a full analysis of the proposed project's impact to schools. As stated under Impact PS-3 beginning on page 4.15-13, existing laws would require future project applicant(s) of any development facilitated by the project on Rezoning Sites to pay school impact fees at the time building permits are issued. These fees are used by Sonoma County School Districts to mitigate impacts associated with long-term operation and maintenance of school facilities. The applicant's fees would be determined at the time of the building permit issuance and would reflect the most current fee amount requested by the applicable district. The payment of school developer fees is considered adequate mitigation of schools impacts under CEQA. Therefore, impacts to schools are considered less than significant without mitigation.

Response 149.2

The commenter recommends rezoning in Windsor by the airport and expresses their concerns regarding views of apple orchards.

This comment is noted and will be passed on to decision-makers. Regarding views of apple orchards, please refer to Section 4.1, *Aesthetics*, of the Draft EIR. As discussed therein, the project could have significant impacts on scenic public views including views of agriculture and viticulture.

Regarding rezoning in Windsor, the EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements.

EIR Public Comment 150

COMMENTER: Tammy Melton

DATE: February 11, 2023

Response 150.1

The commenter opposes low-income housing in Forestville.

The commenter's opposition to low-income housing in Forestville is noted and will be passed on to decision-makers for review. Refer to Master Response SITE and Master Response HE.

EIR Public Comment 151

COMMENTER: Greg Carr

DATE: February 22, 2023

Response 151.1

The commenter requests that the project description be expanded to provide more detail on the review process for future development projects on the rezoned sites.

Please refer to Section 1.2 of the Draft EIR. As stated therein, the intent of the EIR is to enable future development by-right, without further discretionary approvals. The project would not modify the County's standard review process for future development projects on the Rezoning Sites. Existing processes, including public notification, opportunities for public involvement, and County discretionary actions would remain, where they are applicable. Individual projects may require entitlements or infrastructure improvements, which would be identified during the project application phase of future projects. Refer to Section 1.2.1, *Intent of the Project EIR*, and Section 1.2.2, *Tiering Opportunities*, for more information on subsequent analysis and approvals.

Response 151.2

The commenter questions the conclusion of no effect to wildlife, as several sites are located far from existing development, and wildlife movement could still occur on or near those sites. The commenter provides GEY-1, PEN-2, and PEN-6 as examples.

As shown in Figure 4.4-1 on page 4.4-2 of the Draft EIR, GEY-1 is located near existing development, including US-101, local roadways, and a number of built structures. As shown in Figure 4.4-9 on page 4.4-10 of the Draft EIR, PEN-2 and PEN-6 are located adjacent to existing built structures and development. The commenters assertion that these sites are wildlife movement corridors is not accurate.

The Draft EIR includes a description of the various habitat types including riparian corridors and waterways that provide wildlife movement opportunities at a local scale throughout the 11 Biological Study Areas (BSAs). Wildlife movement corridors are described beginning on page 4.4-21 of the Draft EIR. As described therein, riparian corridors, waterways, existing trails, and mapped Essential Connectivity Areas are considered wildlife movement corridors. There is no mapped Essential Connectivity Area within the Geyserville or Penngrove BSA. Wood Creek is the nearest movement corridor within the Geyserville BSA, and no movement corridors were identified in the Penngrove BSA. As stated on page 4.4-22 of the Draft EIR:

> The areas surrounding the rivers and creek are primarily developed areas, including urban residential, commercial, and industrial development. Furthermore, most wildlife species that would utilize such connections are likely urban, disturbance tolerant species such as raccoon, skunk, opossum, and black tailed deer.
>
> Developed areas of the BSA where Rezoning Sites would intersect an urban area do not function as essential connectivity areas or as important wildlife corridors due to previous use and disturbance.

Therefore, the conclusion of Impact BIO-4 is accurate. As stated therein, "development facilitated by the project on Rezoning Sites would not affect the function of creeks and riparian areas in the BSAs as local corridors for wildlife movement." Therefore, future development on GEY-1 near Wood Creek would have a less than significant impact on wildlife movement corridors. Furthermore, Mitigation Measure BIO-1 *Biological Resources Screening and Assessment*, requires:

> The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, state, and/or federal agencies.

This measure requires that all projects on Rezoning Sites under the Housing Element update involving ground disturbance through clearing/grading or vegetation trimming assess the project site's potential to serve as a wildlife movement corridor and incorporate further mitigation, as applicable, to reduce impacts to less than significant. Therefore, impacts to wildlife corridors have been identified in the Draft EIR and mitigation beyond Mitigation Measure BIO-1 and subsequent measures identified by the project specific biological analysis are not warranted. As such, no revisions to the Draft EIR are required in response to this comment.

Response 151.3

The commenter asserts that the Draft EIR fails to consider future impacts related to City plans and policies. The commenter requests that Petaluma's "Very Low Residential", Sonoma's "Gateway Commercial", and Santa Rosa's various designations be analyzed for consistency. The commenter requests that the EIR discuss the likelihood of utility extensions within UGBs.

Consistency with City General Plans and Area Plans, as applicable, is provided under Impact LU-2, in the subsections beginning on page 4.11-41. This includes a discussion of consistency with the City of Petaluma General Plan, West Petaluma Area Plan, City of Sonoma General Plan, South Santa Rosa Area Plan, and City of Santa Rosa General Plan.

Response 151.4

The commenter asserts that the Draft EIR fails to address consistency with countywide growth projections and buildout under existing Land Use Maps. The commenter asserts that consistency with Plan Bay Area 2040 is appropriate but irrelevant.

Please refer to Impact PH-1 for an analysis of unplanned population growth generated by the project. As stated therein, "substantial" population growth is defined as growth exceeding ABAG/MTC population forecasts for the Unincorporated County or exceeding the County's forecasted population and associated housing needs. A comparison with General Plan buildout projections is provided on page 4.14-7 of the Draft EIR. As described within Impact PH-1, the project would increase buildout beyond General Plan growth projections, but would not exceed ABAG 2040 population projections or RHNA allocation requirements.

Response 151.5

The commenter asserts that the Draft EIR does not fully support consistency conclusions, and should identify inconsistencies. The commenter asserts that the project is inconsistent with Objectives LU-3.2, LU-4.1, LU-19.1, LU-20.1, and CT-4.1; and Policies LU-3c, LU-19a, LU-20oo, CT-4.2, and CT-4.3. The commenter suggests mitigation be included for individual project-level impacts.

Objective LU-3.2 and Policy LU-3c are related to growth outside of designated Urban Service Areas. As noted in Table 4.11-3 beginning on page 4.11-32, the project would encourage development within Urban Service Areas and is therefore consistent with this objective and policy.

Objective LU-4.1 relates to development where existing services are available. Table 4.11-3 notes that "there is adequate school, parks, public safety (with the payment of fair share fees for police protection), drainage, and wastewater (with implementation of Mitigation Measure UTIL-1) services and infrastructure to serve the Rezoning Sites", and is therefore consistent with this objective.

Objective LU-19.1 and Policy LU-19a relates to zoning near Petaluma. As noted in Table 4.11-3, the project would facilitate new urban uses prior to annexation by Petaluma, and the project would be partially consistent with this objective and policy.

Objective LU-20.1 relates to coordination with the City of Sonoma. As noted in Table 4.11-3, the project would facilitate new urban uses prior to annexation by Sonoma, and the project would be partially consistent with this objective and policy.

Policy LU-20oo does not exist in the County General Plan, so it is unclear which policy the commenter is referring to.

Objective CT-4.1 and Policies CT-4.2 and CT 4.3 are related to traffic congestion. Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion.

Based on the discussion provided under Impact LU-2 of the Draft EIR, the project would not result in inconsistencies with the County General Plan which would result in a significant environmental impact due to a conflict with the plan, policy, or regulation, and impacts would be less than significant. Therefore, mitigation is not required.

Response 151.6

The commenter asserts that the Draft EIR conclusion that impacts are less than significant based on identified housing needs is incorrect. The commenter requests that Table 4.14-4 be updated to include projections from the General Plan, and base the impact conclusion on the General Plan projections. The commenter disagrees with the EIR conclusion that the project is consistent due to proposed General Plan and Zoning amendments, and calls these changes mitigation measures.

The County General Plan does not provide population, housing, or employment projections through 2040, and relies on ABAG projections for population, housing, and employment estimates through 2020. The County General Plan was adopted in 2008, and does not provide projections beyond 2020, which is now in the past. Therefore, the Draft EIR reasonably uses the ABAG projections in Table 4.14-4 for growth within the County through 2040, consistent with methodology previously used by the County, and no revisions are required.

Similarly, the population growth analysis and conclusions in the Draft EIR being based on ABAG projections is appropriate, as the County General Plan does not provide growth projections beyond 2020.

The commenter's suggestion of considering portions of the proposed project (i.e., the General Plan Amendment and Zoning Amendment) as mitigation measures is inconsistent with the *CEQA Guidelines*, as mitigation measures cannot be project components. *CEQA Guidelines* Section 15370 defines mitigation as (1) avoiding an impact by not taking certain actions; (2) limiting the degree of an action; (3) rectifying an impact through repair, rehabilitation, or restoration; (4) preservation and maintenance operations; or (5) compensation. Because the General Plan Amendment and Zoning Amendment are part of the project, it is inappropriate to extricate them from the project and consider these actions as mitigation of an impact, instead of as a necessary approval required for the project to be implemented.

Response 151.7

The commenter asserts that nighttime blasting and pile-driving will not be fully mitigated by proposed mitigation measures. The commenter suggests inclusion of a mitigation measure that prohibits nighttime blasting and pile driving.

Please refer to the following discussion from page 4.13-21 of the Draft EIR:

> Impacts from general construction activities performed between 10 p.m. to 7 a.m. would be less than significant with implementation of Mitigation Measure NOI-1 because nighttime construction would be required to comply with the noise standards shown in Table 4.13-4 and also require a project specific noise analysis with detailed measures for reducing noise levels at noise sensitive receivers within 0.5 mile of the Rezoning Sites.
>
> Impacts from construction using a pile driver performed between 10 p.m. to 7 a.m. would be less than significant with implementation of Mitigation Measure NOI-2 because nighttime pile driving would be required to comply with the noise standards shown in Table 4.13-4 and vibration standards for humans of 0.24 in/sec PPV and for structural damage of 0.4 in/sec PPV. A project specific noise and vibration analysis with detailed measures for reducing noise and vibration levels at sensitive receivers within 2.8 miles for noise and 160 feet for vibration.
>
> Impacts from construction using a breaker performed between 10 p.m. to 7 a.m. would be less than significant with implementation of Mitigation Measure NOI-3 because nighttime breaker activities would be required to comply with the noise standards shown in Table 4.13-4 and also require a project specific noise analysis with detailed measures for reducing breaker noise levels at noise sensitive receivers within 0.5 mile of the Rezoning Sites.
>
> Impacts from construction conducting blasting performed between 10 p.m. to 7 a.m. would be less than significant with implementation of Mitigation Measure NOI-4 because nighttime blasting would be required to comply with the noise standards shown in Table 4.13-4 and vibration standards for humans of 0.24 in/sec PPV and for structural damage of 0.4 in/sec PPV. A project specific noise and vibration analysis with detailed measures for reducing noise and vibration levels at sensitive receivers within 0.25 mile.

As described therein, impacts related to nighttime construction, including blasting and pile-driving, would be reduced to less than significant with adherence to Mitigation Measures NOI-1, NOI-2, NOI-3, and NOI-4. Therefore, additional mitigation is not required.

Response 151.8

The commenter requests that Table 4.15-6 be modified to include actual current school district enrollment numbers.

The most recent enrollment data was used in the Draft EIR, based on information available on July 2022 (please refer to Section 7, References, of the Draft EIR. It is not anticipated that enrollment numbers have changed substantially since July 2022 such that the conclusions of the Draft EIR are invalid.

Response 151.9

The commenter asserts that a conflict with General Plan Objective CT-4.1 and Policies CT-4.2 and CT-4.3 exists, despite the fact that traffic congestion is no longer required under CEQA. The commenter asserts that traffic congestion should be described in the EIR, and mitigation should be included.

Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion.

Response 151.10

The commenter asserts that the Draft EIR does not provide an adequate analysis of growth inducing impacts, and should compare growth to projections in the General Plan. The commenter asserts that the use of Plan Bay Area or RHNA projections is inappropriate.

Please refer to Response 151.6 gregarding the General Plan growth projections, which do not provide estimates beyond 2020.

Response 151.11

The commenter asserts that not all Rezoning Sites are located in Urban Service Areas, and most sites are located within Urban Growth Boundaries that are outside of Urban Service Areas. The commenter asserts that water and sewer extensions would result in additional growth.

Please refer to Figures 2-3 through 2-14 on pages 2-11 through 2-22 of the Draft EIR. As shown therein, each of the rezoning Sites and Other Inventory Sites are within existing Urban Service Area boundaries (grey shading), including sites that are also within Urban Growth Boundaries (dotted overlay).

As stated on page 5-2 of the Draft EIR, infrastructure upgrades “would be sized to specifically serve the individual project and site.” New infrastructure would not provide capacity for unconnected parcels to connect to the extended water and sewer infrastructure; therefore, necessary infrastructure upgrades to serve individual projects would not induce additional growth.

EIR Public Comment 152

COMMENTER: Alanna Spencer

DATE: February 12, 2023

Response 152.1

The commenter expresses concerns regarding water, sewage, accessibility to transportation, road quality, public services including police and shopping, traffic, and evacuation routes. The commenter states that conditions on Mirabel Road are dangerous due to degraded road surface which poses a threat to bicyclists and pedestrians.

Please refer to Master Response UTIL. In addition, please refer to Section 4.18, *Utilities and Services Systems,* of the Draft EIR. As stated on page 4.18-14, each wastewater service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide wastewater service to the Rezoning Sites. With the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites would have access to adequate wastewater service. Please refer to Master Response EMG regarding evacuation routes. Please refer to pages 4.15-12 and 4.15-13, of the Draft EIR regarding police services. Please refer to Master Response TRA regarding traffic, and Response 132.1 regarding road conditions on Mirabel Road.

EIR Public Comment 153

COMMENTER: Ann Dexheimer

DATE: February 12, 2023

Response 153.1

The commenter expresses concerns regarding traffic, pedestrian safety, a sharp road curve and lack of sidewalks adjacent to rezoning sites FOR-5 and FOR-6. The commenter questions why Sebastopol and Windsor were not included in the list of rezoning sites.

Refer to Master Response EXST regarding the street widths and existing traffic safety conditions. This is an existing condition of the area and not caused by the proposed project. Future development facilitated by the project on Rezoning Sites would need to confirm that adjacent roads meet County width requirements. Please refer to Master Response TRA regarding traffic impacts.

In addition, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety; therefore, consistency with County policies on traffic safety would ensure the project would not substantially increase hazards due to design features.

Please refer to Master Response SITE regarding the site selection process, and Response 6.8 regarding why sites are required to be in the unincorporated County.

Response 153.2

The commenter expresses concerns regarding transportation and states that traffic would increase on the Forestville section of 116, a State Scenic Highway.

Please refer to Master Response TRA regarding traffic impacts. Please refer to section 4.1 *Aesthetics* in the Draft EIR. As stated therein impacts to State Scenic Highways, including Highway 116, could be significant and there are no feasible mitigation measures to reduce this potential impact.

Response 153.3

The commenter expresses concerns regarding the availability of shopping services and fire services. The commenter asks how fire services will be impacted, and fire or flood evacuation routes will be managed if there is an increase in population.

Please see Master Response EXST regarding existing conditions. Resident proximity to grocery stores is an existing condition of the area and not caused by the proposed project. As shown in Table 2-6 of the Draft EIR, sites FOR-5 and FOR-6 are within a designated Urban Service Area. Page 4.6-10 of the Draft EIR states that Rezoning Sites located in existing Urban Service Areas ensures that new residences are proximate to commercial, retail, and employment destinations.

Please see pages 4.15-10 and 4.15-11 of the Draft EIR regarding fire services. While the project would generate additional demand, it would not substantially reduce existing response times or require the construction of new or altered fire stations and development facilitated by the project on Rezoning Sites would be required to comply with existing regulations regarding fire safety. Please see Master Response EMG regarding evacuation routes.

Response 153.4

The commenter states that Forestville no longer has a high school and that parents would need to drive on the 116 to take their children to Sebastopol.

This comment has been noted. Please refer to Master Response TRA regarding traffic impacts.

Response 153.5

The commenter expresses concern regarding limited employment opportunities in Forestville and states that residents will be required to drive outside the local area to work. The commenter states that the pictures on page 128 of FOR-5 and FOR-6 appear to be incorrect.

As mentioned in response 153.3, sites FOR-5 and FOR-6 are within a designated Urban Service Area. Page 4.6-10 of the Draft EIR states that Rezoning Sites located in existing Urban Service Areas ensures that new residences are proximate to commercial, retail, and employment destinations.

Figure 4.1-15 and Figure 4.1-16 on page 4.1-19 of the Draft EIR were mis-labeled in the Draft EIR. Figure 4.1-15 shows Site FOR-6 from Forestville Street looking southwest, and Figure 4.1-16 shows Site FOR-5 from Forestville Street looking northwest. For clarification, Figure 4.1-15 and Figure 4.1-16 have been replaced with the following photographs of Sites FOR-5 and FOR-6, which were taken on April 21, 2023:

Figure 4.1-15 FOR-5 from Packing House Road Looking Southeast

Figure 4.1-16 FOR-6 from Forestville Street Looking Southwest

The intent of these figure revisions is to correct the previous figure labeling error of Sites FOR-5 and FOR-6. No analysis in the Draft EIR is affected by this revision, and no additional revisions are warranted.

EIR Public Comment 154

COMMENTER: Arlene Irizary

DATE: February 12, 2023

Response 154.1

The commenter opposes the rezoning of site FOR-4 and expresses concerns regarding the access road, emergency evacuation routes, and construction vehicle access. The commenter questions what infrastructure will be available regarding water, sewer, gas, and electric and questions what the costs associated with infrastructure improvements will be.

The commenter's opposition of the rezoning of site FOR-4 is noted and will be passed on to decision-makers for review. Please refer to Master Response EMG regarding evacuation routes. Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR regarding public services including police services and Master Response TRA regarding traffic.

Please refer to Section 4.18, *Utilities and Service Systems,* in the Draft EIR, and Master Response UTIL. As stated therein, impacts to electricity and wastewater would be less than significant. Impacts related to water supply would be less than significant for all sites except GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4 because these sites are not currently adjacent to water supply infrastructure. For these sites, mitigation measure UTIL-1, as described on page 4.18-17 of the Draft EIR, would be required. This mitigation measure would ensure that future development proposed on the aforementioned sites would be required to demonstrate that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary improvements to serve a Rezoning Site will be made prior to occupancy.

Water and sewer districts charge connection fees and monthly usage fees, which are intended to cover the necessary improvements needed to serve a project site. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects (such as the cost of development) of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes costs associated with utilities.

EIR Public Comment 155

COMMENTER: Arlene Irizary

DATE: February 12, 2023

Response 155.1

The commenter opposes the rezoning of site FOR-1 and expresses concern regarding toxic hazards. The commenter questions the cost of conducting assessments and remediation of hazards on the site before development and questions how it will be funded. The commenter requests the removal of rezoning site FOR-1 from the project.

This comment is noted. Please refer to Section 4.9, *Hazards and Hazardous Materials,* of the Draft EIR for a detailed analysis pertaining to potential hazards and proposed mitigation measures. The EIR identifies FOR-1 as containing the Electro Vector site in Table 4.9-2 of the EIR. Refer to Impact HAZ-2 regarding investigation, remediation, and cleanup before development. As discussed therein, compliance with all applicable regulations relating to site remediation would minimize impacts to development at Rezoning Site FOR-1 to a less than significant level.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, including costs associated with hazards assessments and remediation.

EIR Public Comment 156

COMMENTER: Brice Dunwoodie

DATE: February 12, 2023

Response 156.1

The commenter states their support of expanding affordable housing in a manner that is proportional to current population growth. The commenter expresses concern regarding the distribution of new housing units across Sonoma County and Unincorporated Sonoma. The commenter questions why the current allocations have not been further challenged by the County.

This comment is noted. Because it is not related to the Draft EIR or environmental analysis, it will be passed on to decision-makers.

Response 156.2

The commenter states that the proposed expansion in Guerneville is approximately a 40% population increase, the proposed expansion in Graton is approximately a 70% increase in population, and the proposed expansion in Forestville is approximately a 110% population increase. The commenter questions how the new housing unit allocations were determined, and which agencies or individuals are responsible for approving the housing allocations.

Please refer to Master Response SITE for a description of the site selection process.

Response 156.3

The commenter questions how the Guerneville sites were selected, which criteria was used, who was responsible for the approval of the site selection, and if Sonoma County acquires prior approval from site owners before including privately owned sites in the Housing Element. The commenter states that they have seen a letter opposing the inclusion of site GUE-1 and questions if the site will be included or removed from the Housing Element.

Please refer to Master Response SITE for a description of the site selection process. Additionally, please refer to Master Response HE.

EIR Public Comment 157

COMMENTER: Celeste Johansson

DATE: February 12, 2023

Response 157.1

The commenter states that they are a resident of Forestville and expresses concerns regarding public transportation, road infrastructure and hazards, traffic, and emergency evacuation routes during fires and floods in the area.

Please refer to Master Response EXST regarding existing infrastructure and site conditions, and Master Response EMG regarding emergency services and evacuation. Additionally, please refer to Master Response TRA regarding traffic impacts. Regarding public transportation, please see page 4.16-15 of the Draft EIR. As stated therein impacts to public transportation would be less than significant. Furthermore, construction hazards are discussed in the Draft EIR on page 4.16-18. As stated therein, the project would not substantially increase hazards due to a design feature and impacts would be less than significant.

Response 157.2

The commenter states that the proposed Housing Element would disproportionately increase the population in Forestville compared to other towns in the County, and expresses concerns regarding fire and medical services and infrastructure.

Please refer to Master Response EMG regarding emergency services. Please refer to Master Response UTIL regarding utility infrastructure and Master Response EXST regarding existing site conditions.

Response 157.3

The commenter expresses concerns regarding potential toxic hazards on the proposed rezoning sites. The commenter questions which standards will be followed to mitigate any potential hazards in the soil on the proposed rezoning sites and questions if any exemptions will be issued that would allow potentially hazardous materials to remain on the rezoning sites.

Please refer to Section 4.9, *Hazards and Hazardous Materials*, in the Draft EIR. As stated therein impacts related to hazardous materials would be less than significant with adherence to applicable regulations such as the California Health and Safety Code. For a full list of applicable regulations that the project would be required to comply with to reduce impacts to less than significant, please refer to the Regulatory Setting on page 4.9-4 of the Draft EIR.

EIR Public Comment 158

COMMENTER: Grace Knight

DATE: February 12, 2023

Response 158.1

The commenter requests the removal of rezoning sites GLE-1 and GLE-2 from the Housing Element. The commenter states that the rezoning of the unincorporated community of Glen Ellen would result in the removal of five dwelling units and trees. The commenter expresses concerns about high-density housing, and suggests it should occur near more employment opportunities and public transit. The commenter states the opinion that development facilitated by the Housing Element would be destructive to the community.

This comment is noted and will be passed on to decision-makers.

Please refer to pages 4.14-9 and 4.14-10 of Section 4.10, *Population and Housing,* of the Draft EIR for information regarding displacement. As discussed therein, some of the Rezoning Sites contain existing housing or other structures that could be removed during project implementation. One of the fundamental goals of the project is to provide more housing development opportunities throughout the County and meet countywide housing inventory requirements. Thus, Mitigation Measure PH-1 requires that replacement housing be made temporarily available for any displaced existing residents prior to the demolition of existing housing on any of the Rezoning Sites.

As stated in the EIR, such as under Impact AES-3, the project may result in the removal of existing, mature trees. Trees to be removed have not yet been identified because individual projects have not been developed yet. This impact is analyzed in Section 4.1, *Aesthetics*, and under Impact BIO-5 in Section 4.4¸ *Biological Resources*. As stated therein, "[d]evelopment facilitated by the project would be subject to the County's ordinances and requirements protecting biological resources, such as trees… Trees to be removed have not yet been identified because individual projects have not been developed yet; however, development facilitated by the project on Rezoning Sites would potentially require some tree removal, which would be determined during the project's application process." However, development would be required to comply with goals, policies, and measures in the General Plan, including those for applications for tree removal permits and compliance with associated requirements (e.g., tree replacement), where applicable. Therefore, impacts would be less than significant.

As stated in Response 70.12, Sites GLE-1 and GLE-2 are within a designated Urban Service Area. Section 4.16 of the Draft EIR states that none of the Rezoning Sites are within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor, which includes the Glen Ellen sites. Page 4.6-10 of the Draft EIR states that Rezoning Sites located in existing Urban Service Areas ensures that new residences are proximate to commercial, retail, and employment destinations. Commercial businesses, which require employees to function, do exist in the community of Glen Ellen.

EIR Public Comment 159

COMMENTER: Jean Reggio

DATE: February 12, 2023

Response 159.1

The commenter opposes the rezoning of sites GLE-1 and GLE-2. The commenter expresses concern regarding parking, transportation, employment opportunities, and cumulative development including the Sonoma Developmental Center and a proposed hotel.

This comment is noted and will be passed on to decision-makers. Please note that parking is not considered an environmental impact and is not required to be analyzed under CEQA.

As stated in Response 70.12, Sites GLE-1 and GLE-2 are within a designated Urban Service Area. Section 4.16 of the Draft EIR states that none of the Rezoning Sites are within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor, which includes the Glen Ellen sites. Page 4.6-10 of the Draft EIR states that Rezoning Sites located in existing Urban Service Areas ensures that new residences are proximate to commercial, retail, and employment destinations. Commercial businesses, which require employees to function, do exist in the community of Glen Ellen.

Please refer to Response 70.6 regarding cumulative development.

EIR Public Comment 160

COMMENTER: Joshua Peterson

DATE: February 12, 2023

Response 160.1

The commenter opposes the rezoning of site GE-1 and expresses concerns regarding infrastructure and traffic on nearby one-lane roads.

This comment is noted. Please refer to Master Response UTIL regarding infrastructure and Master Response TRA regarding traffic impacts, and Master Response EXST regarding existing one-lane roads.

Response 160.2

The commenter expresses concerns regarding the potential removal of trees on site GE-1.

Please refer to Section 4.4, *Biological Resources*, in the Draft EIR. As discussed therein, development facilitated by the project on Rezoning Sites would be required to comply with the Sonoma County Tree Protection Ordinance and Article 67 of the Sonoma County Zoning Code to protect oak woodland habitats. Adherence with these requirements would reduce impacts to be less than significant.

Response 160.3

The commenter expresses concerns regarding water, electricity, and wastewater and states that the neighborhood was subject to power outages during recent storms.

Please refer to Section 4.18, *Utilities and Service Systems*, in the Draft EIR. As stated therein, impacts to electricity would be less than significant. Refer to Master Response UTIL regarding water and wastewater impacts. For GUE-1, mitigation measure UTIL-1, as described on page 4.18-17 of the Draft EIR, would be required. This mitigation measure would ensure that future development proposed would be required to demonstrate that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary improvements to serve a Rezoning Site will be made prior to occupancy.

Response 160.4

The commenter states the opinion that there are other underutilized parcels that would be more appropriate for affordable housing.

This comment is noted and will be passed on to decision-makers.

EIR Public Comment 161

COMMENTER: Ken Smith

DATE: February 12, 2023

Response 161.1

The commenter expresses concern regarding emergency evacuation during fire on Highway 116 and River Road. The commenter expresses support for lower density zoning and low and very low density housing in Forestville.

This comment is noted. Please refer to Master Response EMG regarding emergency services and evacuation and Master Response HE regarding expressions of support or dissatisfaction with the Housing Element.

EIR Public Comment 162

COMMENTER: Laura Hanson

DATE: February 12, 2023

Response 162.1

The commenter opposes the proposed rezoning sites in Forestville. The commenter expresses concern regarding resources, traffic, water, and solid waste services. The commenter questions the need for housing in Forestville when there are new apartment complexes in Santa Rosa.

This comment is noted. Please refer to Master Response TRA regarding traffic congestion. Please refer to comment 160.3 regarding water supply impacts. As discussed on page 4.18-17 of the Draft EIR, impacts related to solid waste would be less than significant. Refer to Response 6.8 regarding housing in incorporated areas, including Santa Rosa.

EIR Public Comment 163

COMMENTER: Louis Hughes

DATE: February 12, 2023

Response 163.1

The commenter opposes proposed development in Forestville. The commenter expresses concerns regarding traffic on Highway 166, public services, and pedestrian facilities. The commenter states the opinion that multi-unit housing is more suited for urban areas.

This comment is noted. Please refer to Master Response TRA regarding traffic impacts. Regarding pedestrian facilities, please refer to Impact TRA-2 in Section 4.16, *Transportation,* of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level. Refer to Master Response TRA regarding traffic congestion. Refer to Response 6.8 regarding urban areas of the County that may be more suitable for housing.

EIR Public Comment 164

COMMENTER: MaryAnne Gustafson

DATE: February 12, 2023

Response 164.1

The commenter expresses concerns about floods, earthquake, and fire in Guerneville. The commenter states that three rezoning sites are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policies. The commenter states the opinion that there are areas downtown that are more suitable for rezoning and requests that the comment period is extended.

This comment is noted and will be passed on to decision-makers. Please refer to Master Response EXST regarding existing conditions and SITE regarding the site selection process. Table 4.19-2 of the EIR identifies the Guerneville sites as in a Moderate Fire Hazard Severity Zone. The commenter does not specify the three sites in question, but the three sites closest to the indicated address in the comment letter are sites GUE-2, GUE-3, and GUE-4. As shown in Figures 4.10-4 (as revised) and 4.10-5, GUE-3 and GUE-4 are partially within the 100-year floodplain, while GUE-2 is outside of FEMA-designated floodplains. As acknowledged in Section 4.7, *Geology and Soils*, Sonoma County is subject to risks associated with potentially destructive earthquakes, and as stated on page 4.7-3 of the EIR, GUE-3 and GUE-4 contain soils with high or very high liquefaction levels. As addressed on page 4.7-26 of the EIR, compliance with mandatory California Building Code requirements, implementation of General Plan goals and policies, and compliance with applicable laws and regulations would reduce impacts related to liquefaction to a less-than-significant level. As stated in Table 4.19-2 in the EIR, GUE-1 through GUE-4 are located in a Moderate Fire Hazard Severity Zone, and is greater than two miles from the nearest Very High Fire Hazard Severity Zone. Refer to Section 4.19, *Wildfire*, for analysis relating to Wildfire; as stated in Impact WFR-2, "[w]ith implementation of Mitigation Measures WFR-1, WFR-2, and WFR-3, the risk of loss of structures and the risk of injury or death due to wildfires would be reduced. These measures would make structures more fire resistant and less vulnerable to loss in the event of a wildfire. These measures would also reduce the potential for construction to inadvertently ignite a wildfire. However, it is not possible to prevent a significant risk of wildfires or fully protect people and structures from the risks of wildfires, despite implementation of mitigation. Thus, this impact would remain significant and unavoidable."

EIR Public Comment 165

COMMENTER: Kelly Joyce

DATE: February 12, 2023

Response 165.1

The commenter expresses concerns regarding the safety of pedestrians and bicyclists near rezoning sites FOR-3, FOR-5, and FOR-6. The commenter states that the area floods multiple times per year, is adjacent to water and wastewater facilities and a designated scenic highway. The commenter expresses concerns regarding fire services, nesting and foraging of wildlife and the potential to obstruct views from Conor Court.

Please refer to Master Response EXST regarding existing conditions on the rezone sites. Figure 4.10-4 on page 4.10-10 of the Draft EIR shows that none of the rezone sites in Forestville are within FEMA flood zones. Please refer to Section 4.1, *Aesthetics*, in the Draft EIR for a full discussion of impacts to scenic highways and the obstruction of views. Please refer to Master Response EMG regarding fire services and evacuations. Please refer to Section 4.4, *Biological Resources*, in the Draft EIR regarding nesting and foraging wildlife. As discussed therein, impacts to wildlife and nesting birds would be significant and mitigation measures BIO-1 through BIO-16 would be required to mitigate impacts to the extent feasible.

Response 165.2

The commenter states that the proposed population increase in Forestville is 43.6 percent. The commenter expresses concern regarding infrastructure and power outages.

Please refer to Master Response UTIL regarding utility services.

Response 165.3

The commenter states that a setback is required for water and wastewater.

This comment is noted. Restrictions on height, setbacks, and floor-area ratio, where appropriate, would follow the applicable zoning requirements outlined in the Sonoma County Zoning Code.

Response 165.4

The commenter expresses concern regarding views of the rezoning sites and nearby trees from Conor Court.

Please refer to Section 4.1, *Aesthetics*, in the Draft EIR for a full discussion of aesthetic impacts. As discussed therein, impacts to public views and scenic vistas would be significant and unavoidable.

Response 165.5

The commenter states that rezoning sites FOR-3, FOR-5, and FOR-6 are adjacent to a high fire severity zone and expresses concern regarding evacuation routes and emergency vehicle access on Packinghouse Road and Highway 116.

Please refer to Master Response EMG and Master Response FIRE.

Response 165.6

The commenter expresses concern regarding impact to community character and suggests the location would be suitable for a skate park, a dog park, and community garden.

This comment is noted and will be passed on to decision-makers.

Response 165.7

The commenter expresses concern regarding lighting impacts and views from Conor Court.

Please refer to response 165.4, above. Additionally, impacts related to light and glare are discussed on page 4.1-57 of the Draft EIR. As stated therein, impacts related to light and glare would be less than significant with the incorporation of mitigation measures AES-2 which would require development facilitated by the project on Rezoning Sites to comply with exterior lighting requirements.

Response 165.8

The commenter expresses concern wildlife corridors and states that they have seen bobcats, deer, owls, fox, coyotes, and birds.

Please refer to response 165.1, above.

Response 165.9

The commenter expresses concern regarding traffic, emergency evacuation, police services, pedestrian safety, and flooding on Highway 116. The commenter states that there are no sidewalks or bike lanes along Highway 116 or crosswalks to access the nearby elementary school.

Please refer to Master Response EMG regarding emergency evacuation. Please refer to Impact PS-2, beginning on page 4.15-12 of the Draft EIR, regarding impacts to police services. Please refer to Impact TRA-1, beginning on page 4.16-14 of the Draft EIR, regarding impacts to pedestrian facilities, and Impact TRA-2, on page 4.16-18 of the Draft EIR, regarding traffic safety impacts. Please refer to Master Response EXST regarding existing conditions. CEQA does not require projects to mitigate existing conditions or deficiencies.

EIR Public Comment 166

COMMENTER: Renee Tchirkine

DATE: February 12, 2023

Response 166.1

The commenter states an opinion that the rezoning of parcel FOR-2 is inappropriate and dangerous since Mirabel Road is a busy road with no room for sidewalks on either side. The commenter asks how the County will provide sidewalks and other ways to cross this road once development is in place.

This comment is noted and will be passed on to decision-makers. Please refer to Master Response EXST regarding existing road conditions. Road improvements to meet County standards would be required for future projects where adequate site access does not exist.

Response 166.2

The commenter states that there is no high school, no major markets, care units, police force, or freeway access for at least 10 miles and expresses concern over the carbon footprint this project would create. The commenter asks why more of the high-density housing is not centered along the Highway 101 corridor where more major services, transit opportunities, safer rods, sewer, and police and medical are available. The commenter asks why more of the high-density housing is not centered along the Highway 101 corridor where more major services, transit opportunities, safer roads, sewer, and police and medical are available.

This comment is noted and will be passed on to decision-makers. Please refer to Master Response EXST regarding existing conditions and Master Response SITE regarding the site selection process. As shown in Figure 2-6 of the Draft EIR, site FOR-2 is located within an Urban Service Area. Page 4.6-10 of the Draft EIR states that Rezoning Sites located in existing Urban Service Areas ensures that new residences are proximate to commercial, retail, and employment destinations. Refer to Master Response UTIL and Section 4.18, *Utilities and Service Systems*, regarding wastewater treatment and infrastructures. Refer to Section 4.15, *Public Services and Recreation*, regarding schools and public services.

As discussed in Section 4.8, *Greenhouse Gas Emissions,* beginning on page 4.8-17, GHG emissions generated during project operation would result primarily from energy usage in buildings and fuel consumption associated with light-duty vehicles. Although the County of Sonoma does not have a qualified GHG-reduction plan, there are some proposed Housing Element policies that would assist in reducing emissions. Specifically, Policy HE-3e would reduce GHG emissions through the encouragement of infill development, ultimately reducing VMT. Policies HE-3g and HE-5d would focus development in areas well-served by existing transit, which would also reduce GHG emissions by reducing VMT. Similarly, Policy HE-6f focuses on the provision of high-quality public transportation. Policies HE-6a and HE-6b would promote the conservation of energy and energy efficiency in both new and existing development, which would reduce GHG emissions by reducing overall energy usage.

Response 166.3

The commenter asks how the construction process for FOR-2 will be handled. The commenter expresses concern that during the summer months there are a lot of tourists on Mirabel Road and asks how they will be protected from traffic on Mirabel Road.

Refer to O-2.7 regarding traffic levels on Mirabel Road and refer to Master Response TRA regarding traffic impacts. Refer to Section 4.16, *Transportation*, of the EIR regarding pedestrian safety and construction traffic, which includes a requirement to implement Mitigation Measure TRA-2 by submitting a construction traffic management plan to mitigate impacts regarding construction traffic. With this mitigation, construction traffic impacts would be less than significant.

Response 166.4

The commenter expresses concern over the proposed population increase in Forestville and why this increase is so disproportional when compared to the increases proposed in other areas. The commenter expresses concern over the proposed population increase in Forestville and why this increase is so disproportional when compared to the increases proposed in other areas. The commenter suggests rezoning sites a subset of Forestville sites to provide Forestville's share of population increase.

This comment is noted and will be passed on to decision-makers. Please refer to Master Response SITE regarding the site selection process.

Response 166.5

The commenter acknowledges the hard decisions ahead and asks that their concerns are listened to, reviewed and considered.

This comment is noted and will be passed on to decision-makers.

EIR Public Comment 167

COMMENTER: Robert Grandmaison

DATE: February 12, 2023

Response 167.1

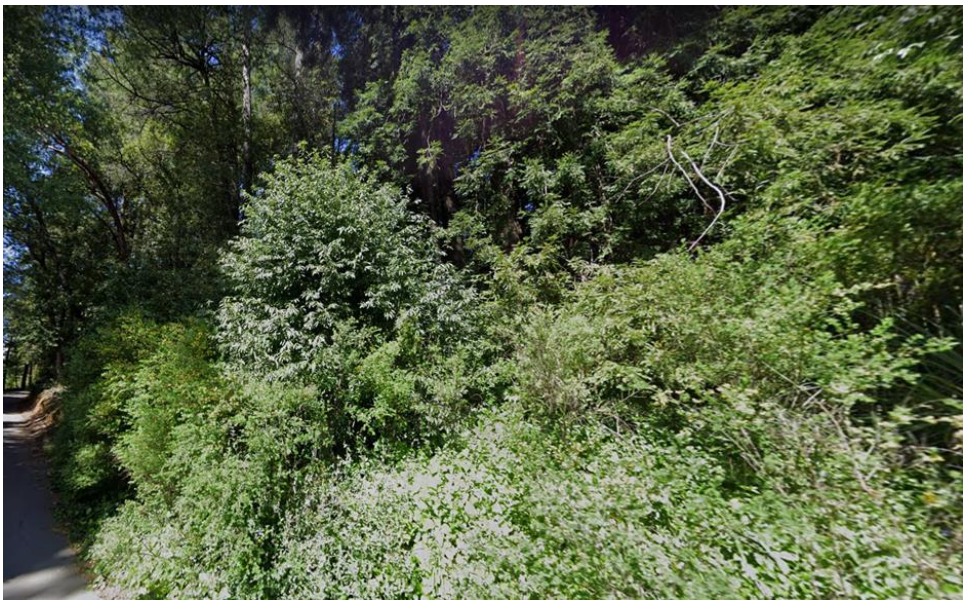
The commenter opposes the rezoning of site GUE-1 and expresses support for the student housing for Santa Rosa Junior College.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 167.2

The commenter states that there is an error in the photograph depicting site GUE-1 and that the GUE-1 site on Sunset Avenue is occupied by water treatment facilities and an emergency generator.

River Road was used as the vantage point for evaluating the visual dominance associated with Site GUE-1. Please note that site photographs of GUE-1 were unable to be taken due to private road signage leading up to the property. An additional photograph of GUE-1 is available below, which shows Site GUE-1 from Sunset Avenue, facing northeast:



Source: Google Earth 2019

The characterization on page 4.1-11 of Site GUE-1 remains accurate:

GUE-1 is elevated but trees screen the site from the River Road and the Russian River beyond (southeast). Site sensitivity is moderate and the zoning includes the LG/116 (Highway 116 Scenic Corridor) Combining District; from River Road, the visual quality is low as roadwork, highway signage, and construction stockpiles are visible in the foreground, along with above-ground transmission lines disrupting any sense of intactness or visual unity. Despite the dense forestation in the middle ground

(Figure 4.1-4), the views lack vividness looking west from the roadway, for the same reasons. Development on the site would be dominant if significant numbers of trees were removed.

Regarding the existing wastewater treatment facilities and emergency generator, please refer to Master Response HE. As stated therein, a site on the list of Rezoning Sites does not guarantee that the site will or will not be developed.

Response 167.3

The commenter states that Guerneville is dependent upon the water supply and water treatment resources located at site GUE-1 and expresses concern that these issues are not adequately addressed in the EIR.

This comment is noted. Please refer to Master Response HE. As stated therein, a site on the list of Rezoning Sites does not guarantee that the site will or will not be developed.

Response 167.4

The commenter expresses concern regarding access to public transportation from site GUE-1 and the elevation gain required to access the site by walking. The commenter expresses concerns regarding ADA compliance and suggests that future residents may choose to drive into town which could increase traffic.

Please refer to pages 4.15-1 through 4.15-5 of the Draft EIR regarding access to public services and pages 4.16-5 and 4.16-6 of the Draft EIR for information regarding public transportation. Refer to Master Response EXST regarding transit availability. As stated under Impact TRA-1, "in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks." This situation is an existing condition of the area and is not caused by the proposed project.

Response 167.5

The commenter states that there are narrow roads with adjacent steep hillsides along Sunset Avenue. The commenter states that when driving on Sunset, Morningside, Palo Alto, and Woodland, it often becomes necessary for downhill moving vehicles to reverse up the hill to allow for oncoming uphill moving vehicles to pass. The commenter expresses concern regarding emergency vehicle access, delivery truck access and emergency evacuation on narrow roads with potential future traffic increases.

Refer to Master Response EXST regarding existing narrow roads and transit availability. This situation is an existing condition of the area and is not caused by the proposed project. In addition, please refer to Master Response EMG for additional information pertaining to emergency evacuation.

Response 167.6

The commenter expresses concern regarding electric and telecommunication lines, and states that fallen tree limbs during storms and wind events often result in outages. The commenter notes that fallen tree limbs can also block roads.

This comment is not relevant to the environmental impact analysis presented for the proposed project. This comment is noted. Refer to Master Response EXST regarding existing power outages.

Response 167.7

The commenter restates their opposition to the rezoning of site GUE-1.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

EIR Public Comment 168

COMMENTER: Roger Peters

DATE: February 12, 2023

Response 168.1

The commenter questions why the EIR does not analyze cumulative impacts in detail for foreseeable known and pending projects. The commenter expresses confusion regarding if the EIR will be used for tiering.

Please refer to the explanation provided under subheading *Cumulative Development* on page 4-2 of the Draft EIR. As stated therein:

> *CEQA Guidelines* Section 15130 provides the following direction relative to cumulative impact analysis and states that the following elements are necessary for an adequate discussion of environmental impacts:
>
> > A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

Therefore, the cumulative analysis approach in the Draft EIR is appropriate for the housing element program, and individual cumulative development projects need not be identified.

The Program EIR's approach to cumulative impact analysis is further described on page 4-2. As stated therein:

> …the transportation analysis considers the overall change in vehicle miles travelled (VMT) due to implementing several reasonably foreseeable development projects that would add to the Housing Element buildout. As such, the analysis in this EIR considers the cumulative impacts in the County from implementation of the Housing Element in its transportation analysis at the same time it considers the project level analysis because they are essentially one and the same. These cumulative VMT calculations are accounted for in the air quality, energy, greenhouse gas emissions, and noise analyses; therefore, these analyses would also be considered cumulative. Other impacts, such as geology and soils and cultural resources, are site specific and would not result in an overall cumulative impact from growth outside of the County.

Please refer to Section 1.2, beginning on page 1-1 of the Draft EIR, regarding tiering opportunities from the EIR. As stated therein, the EIR would allow for CEQA tiering of future projects.

Response 168.2

The commenter notes that the Draft EIR transportation analysis uses the July 2020 SCTA travel demand model, and questions its appropriateness. The commenter asks why a list of approved, known, or reasonably foreseeable projects was not discussed. The commenter mentions the SDC and Hanna Boys projects. The commenter asks if the SCTA model includes the SDC Specific Plan and Hanna Boys Project.

Please refer to Master Response TRA and Appendix TRA to the Draft EIR regarding traffic congestion/LOS impacts. Please refer to Response 168.1 regarding the absence of a cumulative project list.

No application has been submitted for the Hanna Boys Project and the SDC Specific Plan was adopted after publication of the EIR; therefore, neither are included in the SCTA model. Refer also to Response 70.6 regarding the Sonoma Developmental Center and cumulative analysis.

The July 2020 SCTA model was the most recent model at the time the traffic modeling was completed.

Response 168.3

The commenter questions why a segment LOS analysis was not conducted for sites SON-1, SON-2, and SON-3 relative to the impacts of SDC and Hanna Boys Center on Arnold Drive.

Please refer to Master Response TRA regarding the traffic congestion analysis. Please also refer to Appendix TRA regarding the informational-only LOS analysis. As stated therein, a congestion analysis was conducted for only select intersections, not for every intersection in the vicinity of every Rezoning Site. Intersection 20 (Broadway/SR-12 and Leveroni Road-Napa Road) is the intersection nearest the SON sites that was studied.

Refer to Response 70.6 and Response 168.2 regarding the Sonoma Developmental Center and Hanna Boys Center developments.

Response 168.4

The commenter questions if the SDC and Hanna Boys Center projects were included in the cumulative analysis of population and housing.

Refer to Response 70.6 and Response 168.2 regarding the Sonoma Developmental Center and Hanna Boys Center developments and cumulative impact analysis approach.

Response 168.5

The commenter questions if the SDC and Hanna Boys Center projects were included in the cumulative analysis of wastewater treatment capacity and questions if there is adequate capacity to serve cumulative projects through 2040.

Refer to Response 70.6 and Response 168.2 regarding the Sonoma Developmental Center and Hanna Boys Center developments and cumulative impact analysis approach.

Wastewater capacity was addressed in Section 4.18, *Utilities and Service Systems*, of the Draft EIR, as well as in Appendix WSS, including capacities associated with future development on the SON sites. Information from the Sonoma Valley County Sanitation District (SVCSD) can be found on page 22, which includes information on future capital projects to address capacity issues. As noted, future development would require hydraulic analysis to verify adequate capacity exists.

Response 168.6

The commenter questions if the EIR analysis assessed a change in VMT near sites PET-1 through PET-4 based on the elimination of the Bodega Market site proposed for housing.

The VMT analysis did not consider the elimination of the Bodega Market, as rezoning the site would not preclude the Market from continuing to operate as under existing conditions. Existing VMT generated by existing uses was not subtracted from the model, only new potential uses were added to the model to evaluate the VMT impacts. This provides a conservative approach.

OPR's Technical Advisory on Evaluation Transportation Impacts in CEQA states: "OPR recommends analyzing each use separately, or simply focusing analysis on the dominant use".[7] Therefore, Appendix TRA evaluated the dominant VMT elements, which encompassed the residential uses that would be allowed by the proposed rezoning. The Bodega Market is not considered a dominant VMT element.

Response 168.7

The commenter questions why no intersection analysis was specifically included in the EIR for the Bodega Avenue and Cleveland Lane intersection. The commenter states that it seems more likely for traffic to sites PET-1 and PET-2 to use Cleveland Lane than Paula Lane.

Please refer to Master Response TRA regarding the traffic congestion analysis. Please also refer to Appendix TRA regarding the informational-only LOS analysis. As stated therein, a congestion analysis was conducted for only select intersections, not for every intersection in the vicinity of ever Rezoning Site. Intersection 19 (Bodega Avenue and Paula Lane) is the intersection nearest the PET sites that was studied. Please refer to Figure 2-12 on page 2-20 of the Draft EIR. As shown therein, Bodega Avenue and Paula Lane is the intersection nearest to all four PET sites. Please refer to Attachment B to Appendix TRA, where traffic volume figures are provided at this intersection.

[7] https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

EIR Public Comment 169

COMMENTER: Ron Redmon

DATE: February 12, 2023

Response 169.1

The commenter states that they are living in Santa Rosa and expresses appreciation for the efforts to provide more affordable housing in Sonoma County.

This comment has been noted.

Response 169.2

The commenter expresses concerns regarding traffic near site GUE-2 that they are living in Santa Rosa and expresses appreciation for the efforts to provide more affordable housing in Sonoma County.

This comment has been noted. Please refer to Master Response TRA regarding traffic congestion.

Response 169.3

The commenter expresses concerns regarding safety, emergency access, and evacuation routes during a fire or earthquake. Specifically, the commenter states that there is a one-lane road leading to the proposed site.

This comment has been noted. Please refer to Master Responses EMG and FIRE regarding emergency evacuation, emergency access, and wildfire emergency evacuation.

Response 169.4

The commenter offers to provide alternative rezoning sites and states that there are safer options citing Fife Creek Apartments as an example.

This comment has been noted and passed onto decision-makers. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Master Response SITE for additional information on the Rezoning Site selection process.

EIR Public Comment 170

COMMENTER: Sachiko Williams

DATE: February 12, 2023

Response 170.1

The commenter expresses concern regarding historic buildings, visual character, and vegetation and trees at sites GE-1 and GE-2.

Please refer to Section 4.1, *Aesthetics*, for information regarding the proposed project's potential impacts to visual character. As stated therein, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings, and the EIR acknowledges the significant and unavoidable impacts that may occur.

Please refer to Section 4.5, *Cultural Resources,* for additional information on potential impacts to historic resources. As stated therein, should a future project result in the demolition or substantial alteration of a historical resource, it would have the potential to materially impair the resource. Therefore, even with mitigation such, impacts may not be reduced to a less than significant level, and the impact would remain significant and unavoidable.

In regard to the commenters' concerns about trees, please refer to Section 4.4, *Biological Resources,* of the Draft EIR. Under Impact BIO-1 starting on page 4.4-28, it is stated that projects that would result in ground disturbance through clearing/grading or vegetation trimming or removal, and a project-specific biological assessment would be required through the implementation of Mitigation Measure BIO-1. Additional mitigation measures would then be required based on the result of the project-specific biological analysis and may include one or more of the additional mitigation measures (Mitigation Measure BIO-2 through Mitigation Measure BIO-12) to reduce impacts to a less than significant level. In addition, as discussed on page 4.4-39, the Sonoma County Zoning Code Chapter 26D and Sonoma County Zoning Code Article 88, Section 26-88-010(m), *Tree Protection Ordinance*, provides for the protection of heritage and landmark trees. Article 67, *Valley Oak Habitat Combining District*, of the Sonoma County Zoning Code provides protection for oak woodland habitats. Compliance with these ordinances would reduce impacts to either oak species to a less than significant level.

EIR Public Comment 171

COMMENTER: Sally Olsen

DATE: February 12, 2023

Response 171.1

The commenter expresses concern regarding water and wastewater services, traffic, and emergency evacuation near the site on Nolan Road (FOR-2).

This comment has been noted. Please refer to Master Response UTIL regarding water and wastewater services. Please refer to Master Response TRA regarding potential traffic impacts. Please refer to Master Response EMG regarding emergency access and emergency evacuation.

EIR Public Comment 172

COMMENTER: Soichiro Takahashi

DATE: February 12, 2023

Response 172.1

The commenter expresses opposition to the proposed rezoning sites in downtown Forestville and expresses opposition to the development of public services nearby. The commenter makes the suggestion to concentrate more housing in downtown Santa Rosa due to the proximity and accessibility to employment opportunities.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites, and refer to Master Response SITE regarding the Rezoning Site selection process and criteria. This comment has been noted and passed onto decision-makers. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, Sebastopol and Windsor, have their own ABAG-assigned RHNA and housing elements. For additional information regarding impacts to schools and law enforcement, please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR.

EIR Public Comment 173

COMMENTER: Tara Underly

DATE: February 12, 2023

Response 173.1

The commenter expresses concerns regarding water and wastewater services and roads near the proposed rezoning site on Nolan Road.

Please refer to Master Response UTIL regarding water and wastewater services, and Master Response TRA regarding roads to serve the project.

EIR Public Comment 174

COMMENTER: Vesta Copestakes

DATE: February 11, 2023

Response 174.1

The commenter welcomes affordable housing and specifies sites FOR-1, FOR-3, FOR-5, and FOR-6 as positive assets.

This comment has been noted and passed onto decision-makers.

Response 174.2

The commenter expresses concerns regarding road access, sidewalks, crosswalks, and emergency evacuation routes for sites FOR-2 and FOR-4.

Please refer to Master Response EXST regarding the existing conditions of roads. This situation is an existing condition of the area and is not caused by the proposed project.

Please refer to pages 4.15-1 through 4.15-5 of the Draft EIR regarding access to public services and pages 4.16-5 and 4.16-6 of the Draft EIR for information regarding public transportation. As stated under Impact TRA-1, "in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks." This situation is an existing condition of the area and is not caused by the proposed project.

Please refer to Master Response EMG regarding emergency access and evacuation.

Response 174.3

The commenter discusses aspects of site FOR-7 including its proximity to a gas station, carwash, downtown and existing infrastructure.

FOR-7 is not a Rezoning Site; this comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Refer to Master Response TRA regarding traffic congestion. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes development cost.

Response 174.4

The commenter states that Rezoning Site FOR-1 is included in Alternatives 1 and 2, but is not included in Alternative 3. The commenter states that Rezoning Site FOR-1 is a prime location for senior housing. The commenter states that Rezoning Site FOR-1 has adequate infrastructure in the area. The commenter states that mitigating the impacts of the site's previous use will be challenging.

As stated in Section 6.3, *Alternative 3: Fewer Rezoning Sites*, the alternative "analyzes the impacts of adding fewer Rezoning Sites to the County's inventory of sites zoned for by-right housing development. Those sites with the most environmental constraints that would make developing sites more difficult, have greater environmental impacts, or would be more costly to develop have been removed from

Alternative 3… These six Rezoning Sites have greater than average environmental constraints compared to the other Rezoning Sites. In particular, these sites would require off-site infrastructure water and sewer improvements to serve future development."

Please see Section 4.9, *Hazards and Hazardous Materials* regarding site-related hazard remediation. Sites with hazardous materials near the Rezoning Sites (including site FOR-1) are listed in Table 4.9-2. Development typically within 0.25 mile of sites identified in Table 4.9-2 would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board, the Sonoma County Local Oversight Program, or DTSC, before construction activities could begin. Compliance with existing State and local regulations regarding onsite hazards would reduce impacts to less than significant.

Response 174.5

The commenter states that Rezoning Sites FOR-3, FOR-5 and FOR-6 have access to the downtown area. The commenter states two of these sites are being considered for use as an Emergency Services Center. The commenter suggests that a skatepark should be developed at one of these sites.

This comment has been noted and will be passed on to decision-makers. This comment does not pertain to analysis in the Draft EIR.

Response 174.6

The commenter states that Forestville needs affordable housing for young families and low-wage workers. The commenter states that the location of future development is very important and that there are existing plans for sidewalks between Mirabel Road and Covey Road along Front Street/Hwy 116. The commenter states that infrastructure in this area is already being developed, and suggests that sites near these improvements are more affordable than sites farther away.

This comment has been noted and will be passed on to decision-makers. Please refer to Master Response EXST regarding the existing conditions of roads and infrastructure. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes development cost.

EIR Public Comment 175

COMMENTER: Vikki Miller

DATE: February 12, 2023

Response 175.1

The commenter states that they are following up from a previous comment submission and that some \of their concerns were addressed in the EIR.

This comment has been noted. Please refer to EIR Public Comment Letters 125, 151, and 264 for responses to the commenter's additional concerns.

EIR Public Comment 176

COMMENTER: William McAfee

DATE: February 12, 2023

Response 176.1

The commenter expresses their opposition to the selection of sites GUE-1 through GUE-6.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 176.2

The commenter expresses concerns regarding narrow roads, water supply, and wastewater capacity.

Please refer to Master Response UTIL regarding water and wastewater concerns. Please refer to Master Response EXST regarding the existing conditions of roads. This situation is an existing condition of the area and is not caused by the proposed project. Pursuant to C*EQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes cost of upgrades.

Response 176.3

The commenter expresses concerns regarding the potential removal of Redwood and other trees, and community character.

In regard to the commenters' concerns about trees, please refer to Section 4.4, *Biological Resources,* of the Draft EIR. Under Impact BIO-1 starting on page 4.4-28, it is stated that projects that would result in ground disturbance through clearing/grading or vegetation trimming or removal, and a project-specific biological assessment would be required through the implementation of Mitigation Measure BIO-1. Additional mitigation measures would then be required based on the result of the project-specific biological analysis and may include one or more of the additional mitigation measures (Mitigation Measure BIO-2 through Mitigation Measure BIO-12) to reduce impacts to a less than significant level. In addition, as discussed on page 4.4-39, the Sonoma County Zoning Code Chapter 26D and Sonoma County Zoning Code Article 88, Section 26-88-010(m), *Tree Protection Ordinance*, provides for the protection of heritage and landmark trees. Article 67, *Valley Oak Habitat Combining District*, of the Sonoma County Zoning Code provides protection for oak woodland habitats. Compliance with these ordinances would reduce impacts to either oak species to a less than significant level.

Please refer to Section 4.1, *Aesthetics*, for information regarding the proposed project's potential impacts to visual character. As stated therein, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Response 176.4

The commenter states that their property borders sites GUE-1 and GUE-4 and expresses concerns regarding evacuation routes during wildfires and floods. The commenter expresses opposition to the rezoning of sites GUE-1 through GUE-6.

This comment has been noted. Please refer to Master Response EMG and FIRE regarding emergency response and emergency access. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR for detail pertaining to impacts of flooding induced by the proposed project. The EIR acknowledges GUE-4 is partially within a 100-year flood hazard area, but as described under Impact HWQ-4, increased flooding would not occur because of the project.

EIR Public Comment 177

COMMENTER: Aaron Dornstreich

DATE: February 13, 2023

Response 177.1

The commenter expresses opposition to the proposed rezoning of the site located at 6555 Covey Road (FOR-1) in Forestville.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 177.2

The commenter questions how water and wastewater will be provided, how existing road conditions will account for increased traffic, how new school-age residents will have access to schools, how law enforcement services will be provided to support an increase in population, and how evacuation routes will be safely managed.

Please refer to Master Response UTIL regarding concerns about water and wastewater system impacts. In addition, please refer to Section 4.18, *Utilities and Service Systems*, of the Draft EIR. For information regarding traffic please refer to Section 4.16, *Transportation*, of the Draft EIR and Master Response TRA. For information regarding impacts to schools and law enforcement please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR; as stated therein, impacts regarding these impacts would be less than significant. Regarding evacuation, please refer to Master Response EMG.

Response 177.3

The commenter expresses concerns regarding health and safety and restates their opposition for the rezoning sites in Forestville.

This comment has been noted. The commenter does not specify the health impacts they are referring to. For that reason, please refer to Section 4.3, *Air Quality,* or 4.13, *Noise,* for additional information pertaining to potential health impacts induced by the proposed project. Please refer to Section 4.15, *Public Services and Recreation*, for additional information regarding police and fire facilities. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

EIR Public Comment 178

COMMENTER: Aaron Dornstreich

DATE: February 13, 2023

Response 178.1

The commenter expresses opposition to the proposed rezoning of the site located at 6898 Nolan Road (FOR-2) in Forestville. The commenter questions how water and wastewater will be provided, how existing road conditions will account for increased traffic, how new school-age residents will have access to schools, how law enforcement services will be provided to support an increase in population, and how evacuation routes will be safely managed. The commenter expresses concerns regarding health and safety and restates their opposition for the rezoning sites in Forestville.

Please refer to Response 177.1.

Response 178.2

Please refer to Response 177.2.

Response 178.3

Please refer to Response 177.3.

EIR Public Comment 179

COMMENTER: Aaron Dornstreich

DATE: February 13, 2023

Response 179.1

The commenter expresses opposition to the proposed rezoning of the site located at 6250 Forestville Street (FOR-6) in Forestville.

Please refer to Response 177.1.

Response 179.2

The commenter questions how water and wastewater will be provided, how existing road conditions will account for increased traffic, how new school-age residents will have access to schools, how law enforcement services will be provided to support an increase in population, and how evacuation routes will be safely managed.

Please refer to Response 177.2.

Response 179.3

The commenter expresses concerns regarding health and safety and restates their opposition for the rezoning sites in Forestville.

Please refer to Response 177.3.

EIR Public Comment 180

COMMENTER: Aaron Dornstreich

DATE: February 13, 2023

Response 180.1

The commenter expresses opposition to the proposed rezoning of the site located at 6475 Packing Housing Road (FOR-5) in Forestville.

Please refer to Response 177.1.

Response 180.2

The commenter questions how water and wastewater will be provided, how existing road conditions will account for increased traffic, how new school-age residents will have access to schools, how law enforcement services will be provided to support an increase in population, and how evacuation routes will be safely managed.

Please refer to Response 177.2.

Response 180.3

The commenter expresses concerns regarding health and safety and restates their opposition for the rezoning sites in Forestville.

Please refer to Response 177.3.

EIR Public Comment 181

COMMENTER: Aaron Dornstreich

DATE: February 13, 2023

Response 181.1

The commenter expresses opposition to the proposed rezoning of the site located at 6090 Van Keppel Road (FOR-4) in Forestville.

Please refer to Response 177.1.

Response 181.2

The commenter questions how water and wastewater will be provided, how existing road conditions will account for increased traffic, how new school-age residents will have access to schools, how law enforcement services will be provided to support an increase in population, and how evacuation routes will be safely managed.

Please refer to Response 177.2.

Response 181.3

The commenter expresses concerns regarding health and safety and restates their opposition for the rezoning sites in Forestville.

Please refer to Response 177.3.

EIR Public Comment 182

COMMENTER: Aaron Dornstreich

DATE: February 13, 2023

Response 182.1

The commenter expresses opposition to the proposed rezoning of the site located at 6220 Highway 116 (FOR-3) in Forestville.

Please refer to Response 177.1.

Response 182.2

The commenter questions how water and wastewater will be provided, how existing road conditions will account for increased traffic, how new school-age residents will have access to schools, how law enforcement services will be provided to support an increase in population, and how evacuation routes will be safely managed.

Please refer to Response 177.2.

Response 182.3

The commenter expresses concerns regarding health and safety and restates their opposition for the rezoning sites in Forestville.

Please refer to Response 177.3.

EIR Public Comment 183

COMMENTER: Aaron Dornstreich

DATE: February 13, 2023

Response 183.1

The commenter expresses opposition to the proposed rezoning of the site located at 6250 Forestville Street (FOR-6) in Forestville.

Please refer to Response 177.1.

Response 183.2

The commenter questions how water and wastewater will be provided, how existing road conditions will account for increased traffic, how new school-age residents will have access to schools, how law enforcement services will be provided to support an increase in population, and how evacuation routes will be safely managed.

Please refer to Response 177.2.

Response 183.3

The commenter expresses concerns regarding health and safety and restates their opposition for the rezoning sites in Forestville.

Please refer to Response 177.3.

EIR Public Comment 184

COMMENTER: Aaron Mason

DATE: February 13, 2023

Response 184.1

The commenter expresses support for medium density housing on all proposed Rezoning Sites in Forestville except FOR-4. The commenter gives some information about their connection to Forestville. The commenter expresses support for putting additional housing closer to urban and walkable areas.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 184.2

The commenter expresses support for Rezoning Sites FOR-1, FOR-3, FOR-5, and FOR-6. The commenter expresses support for Rezoning Site FOR-2 but notes it is slightly further from downtown but offers other amenities. The commenter expresses support for FOR-7.

As shown in Table 2-2 of the Draft EIR, FOR-7 is not a Rezoning Site. This comment has been noted and passed onto decision-makers. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 184.3

The commenter expresses opposition to Rezoning Site FOR-4. The commenter states that the site is located in single-family home area on the end of a dirt path. The commenter states that sidewalks, roads, and other infrastructure are needed to support development at this site. The commenter expresses concerns regarding safety. The commenter states that FOR-4 is far from downtown and amenities would not be within a walkable distance.

Regarding the existing condition of the road, please refer to Master Response EXST. This situation is an existing condition of the area and is not caused by the proposed project.

Regarding the need for sidewalks, pedestrian safety, and access to the downtown, please refer to pages 4.15-1 through 4.15-5 of the Draft EIR regarding access to public services and pages 4.16-5 and 4.16-6 of the Draft EIR for information regarding public transportation. As stated under Impact TRA-1, “in compliance with the County of Sonoma’s General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks.”

EIR Public Comment 185

COMMENTER: Amber and Todd Gray

DATE: February 13, 2023

Response 185.1

The commenter expresses opposition to the potential population increase in Forestville. The commenter expresses concerns regarding existing infrastructure, sidewalks, sewer system, transportation options, road safety, and parking.

Please refer to Master Response UTIL for concerns regarding the existing sewer system. In regard to road safety, please refer to Section 4.16, *Transportation,* page 4.16-18 of the Draft EIR. As discussed therein, development facilitated by the proposed project on Rezoning Sites would be required to comply with General Plan policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Refer also to Master Response EXST regarding concerns regarding the current lack of sidewalks, existing sewer capacity, and current lack of public transportation.

Please refer to Section 4.16, *Transportation*, regarding existing transportation options. Please refer to pages 4.16-5 and 4.16-6 of the Draft EIR for information regarding public transportation. As stated under Impact TRA-1, "in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks." This situation is an existing condition of the area and is not caused by the proposed project. Please note that parking is not an issue area required to be discussed under CEQA.

EIR Public Comment 186

COMMENTER: Anna Hayman

DATE: February 13, 2023

Response 186.1

The commenter states that the community surrounding Laughlin Road in Guerneville opposes the rezoning of GUE-2, GUE-3, and GUE-4.

Refer to Response 14.1.

Response 186.2

The commenter expresses concerns regarding utility availability and evacuation routes near rezoning sites GUE-2 and GUE-3.

Refer to Response 14.2

Response 186.3

The commenter expresses concerns regarding water and sewer services near rezoning sites GUE-2 and GUE-3.

Refer to Response 14.3

Response 186.4

The commenter states that rezoning sites GUE-2, GUE-3, and GUE-4 are within high fire hazard zones, floodplains, and earthquake risk areas and are zoned as subject to high susceptibility to liquefaction. The commenter states that building in high fire zones and floodplains is contrary to the County General Plan.

Refer to Response 14.4.

Response 186.5

The commenter expresses concerns regarding scenic resources and the potential removal of Redwood and Oak trees.

Refer to Response 14.5.

Response 186.6

The commenter states that Rezoning Sites GUE-2, GUE-3, and GUE-4 are inconsistent with the goals of the County General Plan, Bay Area 2050, Housing Element Policy.

Refer to Response 14.6.

Response 186.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 187

COMMENTER: Anne Kushner

DATE: February 13, 2023

Response 187.1

The commenter expresses opposition to the two Rezoning Sites in Glen Ellen (GLE-1 and GLE-2).

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 187.2

The commenter expresses opposition to the proposed density at each site. The commenter expresses concerns regarding tree removal. The commenter expresses concerns regarding existing infrastructure and services in the area, stating that Glen Ellen does not have a robust downtown to support this level of development. The commenter states concerns regarding the analysis of cumulative projects regarding the Sonoma Developmental Center, development on the north side of Carquinez, and the Hanna Boys Center. The commenter states that the area has poor traffic and planning and expresses concerns regarding consistency with Glen Ellen Development Guidelines and cumulative development.

County Code Section 26-75-050(1) state that workforce housing projects shall have a minimum density of 16 units per acre and a maximum density of 24 units per acre. As shown in Table 2-4, this corresponds to a maximum development of the Glen Ellen sites of 20 total units (18 units on GLE-1 and 2 units on GLE-2). GLE-1 is 0.73 acres in size, and GLE-2 is 0.12 acres in size, for a total of 0.85 acres. This corresponds to a combined minimum unit requirement of 13.6 (0.85 acres multiplied by 16 units per acre) with application of the WH combining district.

Please refer to Section 6.4, beginning on page 6-16 of the Draft EIR. As stated therein:

> The County considered a lower density alternative, but this would not achieve project objectives because lower densities would not meet the County's 6th cycle RHNA requirements due to the limitations of finding additional sites that could support residential uses. Therefore, this alternative was rejected.

As stated in Response 70.23, the potential for tree removal is acknowledged on page 4.4-40 of the Draft EIR; however, compliance with County-required policies related to heritage trees and tree removal (which apply to all projects in the County, regardless of CEQA requirements) is determined to be adequate to reduce impacts to less than significant.

As stated in Response 70.12, Sites GLE-1 and GLE-2 are within a designated Urban Service Area. Page 4.6-10 of the Draft EIR states that Rezoning Sites located in existing Urban Service Areas ensures that new residences are proximate to commercial, retail, and employment destinations. Commercial businesses, which require employees to function, do exist in the community of Glen Ellen. Please refer to Response 70.22 regarding adherence of future projects to the Glen Ellen Development and Design Guidelines.

Cumulative development analysis is described beginning on page 4-2 of the Draft EIR. As stated therein, cumulative impacts were evaluated at a programmatic level, and specific individual projects were not identified as part of this analysis. Refer to Response 70.6 for specifics regarding consideration of the Sonoma Developmental Center.

EIR Public Comment 188

COMMENTER: Aram Sarkissian

DATE: February 13, 2023

Response 188.1

The commenter expresses opposition to the Rezoning Sites in Forestville. The commenter expresses concerns regarding the potential increase in population, traffic, safety, and overall quality of life. The commenter states that the following comments pertain to Rezoning Site FOR-2.

This comment is noted. The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter.

Impact PH-1, beginning on page 4.14-6 of the Draft EIR, addresses potential impacts related to unplanned population growth. As described therein, this impact would be less than significant.

Please refer to Master Response EXST regarding existing conditions. Please refer to Master Response TRA regarding traffic congestion. Please refer to Impact TRA-2, beginning on page 4.16-18 of the Draft EIR, regarding traffic safety impacts associated with development facilitated by the proposed project on Rezoning Sites.

Response 188.2

The commenter states that Mirabel Road is very busy and expresses concerns regarding traffic. The commenter asks how the County plans to facilitate safe flow of traffic.

Please refer to Master Response TRA regarding traffic congestion. Please refer to Master Response EXST regarding existing conditions. Please refer to Impact TRA-2, beginning on page 4.16-18 of the Draft EIR, regarding traffic safety impacts associated with development facilitated by the proposed project on Rezoning Sites.

Response 188.3

The commenter asks how the County plans to improve pedestrian safety in the area.

Please refer to Impact TRA-2 in Section 4.16, *Transportation,* of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

Response 188.4

The commenter states that there is limited public transportation in Forestville. The commenter asks how the County plans to ensure the safety of pedestrians walking to the bus stops.

Please refer to Master Response EXST regarding existing conditions. Refer to Response 188.3 regarding pedestrian safety.

Response 188.5

The commenter asks how the County plans to improve transportation from Forestville to Santa Rosa and throughout the Russian River.

Refer to Section 4.16, *Transportation*, of the EIR for transportation analysis. Regarding the existing lack of public transportation, please refer to Master Response EXST as this is a current condition, not one caused by the project. As described under Impact TRA-1, the project would have a less than significant impact on public transportation. While outside the scope of CEQA, please refer to Appendix TRA of the Draft EIR for congestion effects at specific intersections near the Rezoning Sites for informational purposes. As described therein, no near-term congestion improvements would be necessary as a result of the project.

Response 188.6

The commenter asks what the County will do to improve the local elementary school to accommodate an increase in the number of students.

Impacts to schools are analyzed in Section 4.15, *Public Services and Recreation* under Impact PS-3. As stated therein, "development facilitated by the project on Rezoning Sites would generate approximately 1,145 school-aged children across 11 school districts in the County." Based on the projected decline in enrollment across school districts serving the Rezoning Sites and the estimated 1,145 new school-aged children that would result from development associated with rezoning under implementation of the project, most of the school districts would be able to absorb new and incoming students because the increases in the student population are not greater than the anticipated decreases in enrollment (with the exception of Forestville Elementary and Geyserville Unified School Districts). Based on Table 4.15-6, Forestville Elementary may see an increase of 54 students. Applicants would pay school impact fees at the time building permits are issued, to be used by Sonoma County School Districts to mitigate impacts with long-term maintenance and operation of school facilities. This impact would be less than significant, as stated in the EIR.

Response 188.7

The commenter states that the existing sewer and water systems would need updates. The commenter asks what upgrades are planned. The commenter asks how the water district will accommodate the increase in population.

Please refer to Master Response UTIL regarding water and wastewater systems. As stated in Section 4.18, *Utilities and Service Systems*, on page 4.18-15 of the Draft EIR, "several of the Rezoning Sites are not adjacent to existing water or wastewater infrastructure and require further evaluation at the project level during the plan review and permit approval phase. Mitigation Measure UTIL-1 is required to reduce impacts related to water supply and wastewater system sufficiency." This mitigation measure would ensure future development would be adequately served by providers, except for sites GEY-1 through GEY-4.

Response 188.8

The commenter states that Forestville does not have a police station and asks how the County plans on obtaining additional policing required for an increase in residents.

Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. As discussed therein, under Impact PS-2 on page 4.15-12, the proposed project will not require the development of additional police

facilities and police service ratios and response times will remain adequate. Thus, impacts to police service and facilities was determined to be less than significant.

Response 188.9

The commenter asks how the County plans to improve access to medical and social services.

This comment does not pertain to the environmental impact analysis presented in the Draft EIR. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes access to medical and social services.

Response 188.10

The commenter states that it is inappropriate for communities in unincorporated Sonoma County to increase their population by 50 percent, and that Forestville is carrying a large portion of that increase.

Refer to Response 188.1 and Master Response HE.

EIR Public Comment 189

COMMENTER: Aram Sarkissian

DATE: February 13, 2023

Response 189.1

The commenter expresses opposition to the Rezoning Sites in Forestville. The commenter expresses concerns regarding the potential increase in population, traffic, safety, and overall quality of life. The commenter states that the following commenter pertains to Rezoning Site FOR-4.

Please refer to Response 188.1

Response 189.2

The commenter states that Van Keppel Road is narrow with many turns and expresses concerns regarding traffic. The commenter asks how the County plans to improve traffic safety.

Please refer to Response 188.2.

Response 189.3

The commenter asks how the County plans to facilitate the safe flow of traffic.

Please refer to Response 188.2.

Response 189.4

The commenter asks how the County plans to improve pedestrian safety in the area.

Please refer to Response 188.3

Response 189.5

The commenter states that there is limited public transportation in Forestville. The commenter asks how the County plans to ensure the safety of pedestrians walking to the bus stops.

Please refer to Response 188.4.

Response 189.6

The commenter asks how the County plans to improve transportation from Forestville to Santa Rosa and throughout the Russian River.

Please refer to Response 188.5.

Response 189.7

The commenter asks what the County will do to improve the local elementary school to accommodate an increase in the number of students.

Please refer to Response 188.6.

Response 189.8

The commenter states that the existing sewer and water systems would need updates. The commenter asks what upgrades are planned. The commenter asks how the water district will accommodate the increase in population.

Please refer to Response 188.7.

Response 189.9

The commenter states that Forestville does not have a police station and asks how the County plans on obtaining additional policing required for an increase in residents.

Please refer to Response 188.8.

Response 189.10

The commenter asks how the County plans to improve access to medical and social services.

Please refer to Response 188.9.

Response 189.11

The commenter states that it is inappropriate for communities in unincorporated Sonoma County to increase their population by 50 percent, and that Forestville is carrying a large portion of that increase.

Please refer to Response 188.10.

EIR Public Comment 190

COMMENTER: Aram Sarkissian

DATE: February 13, 2023

Response 190.1

The commenter expresses opposition to the Rezoning Sites in Forestville. The commenter expresses concerns regarding the potential increase in population, traffic, safety, and overall quality of life. The commenter states that the following commenter pertains to Rezoning Site FOR-5.

Please refer to Response 188.1

Response 190.2

The commenter states that Rezoning Site FOR-5 is a natural wetland and home to protected species. The commenter asks if the project intends to disregard environmental laws and asks when an environmental report will be done for the area.

Please refer to Section 4.4, *Biological Resources*, regarding protected species and wetlands. Please refer to Impact BIO-3 regarding jurisdictional, state, or federally protected wetlands. As discussed therein, because of the programmatic nature of the project, a precise, project-level analysis of the specific impacts associated with individual projects on potential wetlands is not possible at this time and site-specific analysis is needed to verify if wetlands are present. Development facilitated by the Housing Element Update would be subject to mitigation measures in the Draft EIR, including BIO-15 and BIO-16. Implementation of Mitigation Measures BIO-15 and BIO-16 would reduce potential impacts to federally or state-protected wetlands to less than significant levels by requiring a jurisdictional delineation be conducted on sites where wetlands are identified during implementation of Mitigation Measure BIO-1, and by requiring avoidance and minimization measures where jurisdictional features may be affected by development. Refer also to Appendix BIO, which has more information regarding biological resources, specifically the information pertaining to the Forestville Biological Study Area (BSA).

Response 190.3

The commenter asks how the County plans to facilitate the safe flow of traffic.

Please refer to Response 188.2.

Response 190.4

The commenter asks how the County plans to improve pedestrian safety in the area.

Please refer to Response 188.3

Response 190.5

The commenter states that there is limited public transportation in Forestville. The commenter asks how the County plans to ensure the safety of pedestrians walking to the bus stops.

Please refer to Response 188.3

Response 190.6

The commenter asks how the County plans to improve transportation from Forestville to Santa Rosa and throughout the Russian River.

Please refer to Response 188.5.

Response 190.7

The commenter asks what the County will do to improve the local elementary school to accommodate an increase in the number of students.

Please refer to Response 188.6.

Response 190.8

The commenter states that the existing sewer and water systems would need updates. The commenter asks what upgrades are planned. The commenter asks how the water district will accommodate the increase in population.

Please refer to Response 188.7.

Response 190.9

The commenter states that Forestville does not have a police station and asks how the County plans on obtaining additional policing required for an increase in residents.

Please refer to Response 188.8.

Response 190.10

The commenter asks how the County plans to improve access to medical and social services.

Please refer to Response 188.9.

Response 190.11

The commenter states that it is inappropriate for communities in unincorporated Sonoma County to increase their population by 50 percent, and that Forestville is carrying a large portion of that increase.

Please refer to Response 188.10.

EIR Public Comment 191

COMMENTER: Aram Sarkissian

DATE: February 13, 2023

Response 191.1

The commenter expresses opposition to the Rezoning Sites in Forestville. The commenter expresses concerns regarding the potential increase in population, traffic, safety, and overall quality of life. The commenter states that the following commenter pertains to Rezoning Site FOR-6.

Please refer to Response 188.1

Response 191.2

The commenter asks how the flow of traffic, bikes, and pedestrians will be accommodated. The commenter states there are few sidewalks, no traffic lights, no lit crosswalks, no bike lanes, and few sheriff patrols.

Please refer to Master Response EXST regarding existing conditions. Refer to Response 188.3 regarding pedestrian safety.

Response 191.3

The commenter asks how the County plans to facilitate the safe flow of traffic.

Please refer to Response 188.2.

Response 191.4

The commenter asks how the County plans to improve pedestrian safety in the area.

Refer to Response 188.3 regarding pedestrian safety.

Response 191.5

The commenter states that there is limited public transportation in Forestville. The commenter asks how the County plans to ensure the safety of pedestrians walking to the bus stops.

Refer to Response 188.3 regarding pedestrian safety.

Response 191.6

The commenter asks how the County plans to improve transportation from Forestville to Santa Rosa and throughout the Russian River.

Please refer to Response 188.5.

Response 191.7

The commenter asks what the County will do to improve the local elementary school to accommodate an increase in the number of students.

Refer to Response 188.6.

Response 191.8

The commenter states that the existing sewer and water systems would need updates. The commenter asks what upgrades are planned. The commenter asks how the water district will accommodate the increase in population.

Refer to response 188.7

Response 191.9

The commenter states that Forestville does not have a police station and asks how the County plans on obtaining additional policing required for an increase in residents.

Please refer to Response 188.8.

Response 191.10

The commenter asks how the County plans to improve access to medical and social services.

Please refer to Response 188.9.

Response 191.11

The commenter states that it is inappropriate for communities in unincorporated Sonoma County to increase their population by 50 percent, and that Forestville is carrying a large portion of that increase.

Please refer to Response 188.10.

EIR Public Comment 192

COMMENTER: Arch Zellick and Mary Neuberger

DATE: February 13, 2023

Response 192.1

The commenter states that they have many concerns regarding the plans to rezone parcels in Forestville. The commenter states that they live within 300 feet of a Rezoning Site but did not receive notification. The commenter states that their following comments are in regard to Rezoning Site FOR-4.

This comment has been noted. The commenter's concern regarding noticing has been forwarded to County staff.

Response 192.2

The commenter states that six sites have been identified in Forestville. The commenter notes that development of all of the proposed Rezoning Sites would constitute a 25 percent increase in population. The commenter states this is more than other areas in West County and that all others have a potential increase of up to 10 percent. The commenter states that Forestville is not equipped to accommodate the existing population.

The commenter is correct in their assertion that the population percentage in Forestville would increase above that of other communities in the County if full buildout of each Rezoning Site is completed. The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria.

Response 192.3

The commenter expresses concerns regarding the lack of roads and challenges it presents during an emergency evacuation. The commenter states that without changes, this will put existing and future residents in danger.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation.

Response 192.4

The commenter states that many of the roads are small and lack sidewalks. The commenter states that the area has no stoplights and can barely handle existing traffic.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure, and Master Response TRA regarding traffic concerns.

Please refer to Section 4.18, *Transportation*, of the Draft EIR. As stated on page 4.16-18, the General Plan has several policies that require that design of future development prioritizes pedestrian safety and traffic safety. Compliance with these policies would ensure the proposed project has a less than significant impact.

Response 192.5

The commenter states that Forestville lacks a police department. The commenter states there is only one small fire station and the next closest is in Graton. The commenter expresses concerns regarding the existing conditions of these services.

Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. As stated therein, development of the Forestville Rezoning Sites would require: compliance with California Fire Code Wildland-Urban Interface (WUI) building standards for sites in the WUI; compliance with the California Fire and Building Code, which applies to construction, equipment, use and occupancy, location, and maintenance of proposed buildings and includes regulations for vegetation and fuel management; completion of a fire hazard assessment and consultation by Fire Prevention Division of Permit Sonoma; installation of automatic fire sprinkler systems per Sonoma County Code Chapters 7 and 13 and General Plan Policy PS-3l; and approval from the Fire Prevention Division during the building permit process that individual project plans meet the site access requirements and provide the required fire safety featured. These requirements would result in less than significant impacts to the increase in demand on fire protection facilities.

The increase in police service demand would result in a need for 12 officers to be added to the Sheriff's Office to maintain the existing service ratio; however, the need for new officers would be distributed throughout the County, with no more than three new officers required at any one station. The proposed project would not have a significant impact on police or fire response times.

Response 192.6

The commenter states there is only one bus line that goes through town. The commenter states it provided minimal service and would need to be upgraded to support an increase in population.

This comment has been noted. Regarding the existing lack of public transportation, please refer to Master Response EXST as this is a current condition, not one caused by the project. As described under Impact TRA-1, the project would have a less than significant impact on public transportation.

Response 192.7

The commenter expresses concerns regarding the limited availability of various commercial services in Forestville.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 192.8

The commenter states that the proposed project may introduce future developments that would conflict with the existing character of Forestville.

Please refer to Section 4.1, *Aesthetics,* of the Draft EIR. As stated therein, the proposed project may impact the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Response 192.9

The commenter states that they do not see an analysis on the impacts to the capacity of the existing sewer and water infrastructure.

For an analysis of impacts to water and the sewer system, please refer to Section 4.18, *Utilities and Service Systems,* of the Draft EIR. Please refer to Master Response UTIL for additional information regarding impacts to the existing sewer system.

Response 192.10

The commenter states that one of the sites designated at FOR-4 can only be accessed by a gravel easement. The commenter states that development of the site would create an undue burden. The commenter states that Van Keppel is not a through road. The commenter says the project would add traffic.

Regarding the existing condition of the road, please refer to Master Response EXST. This situation is an existing condition of the area and is not caused by the proposed project. Refer also to Master Response EMG regarding a condition of approval for two points of ingress/egress for individual developments facilitated by the project. Refer also to Master Response TRA regarding traffic congestion.

Response 192.11

The commenter expresses concerns regarding emergency evacuation during a wildfire and potential safety issues that would arise with a larger population in the area.

This comment has been noted. Please refer to Master Response FIRE and Master Response EMG for information regarding wildfire risk and emergency evacuation.

Response 192.12

The commenter asks if there is enough water and sewer capacity to support future development. The commenter asks how utilities will be provided to Rezoning Site FOR-4. The commenter asks if the road will be expanded.

Please refer to Response 192.9 regarding water and sewer system infrastructure and Response 192.10 regarding road conditions.

Response 192.13

The commenter states that Rezoning Site FOR-4 is bordered by a registered toxic waste site. The commenter states that they did not see a review of groundwater contamination in the Draft EIR.

Please refer to Section 4.9, *Hazards and Hazardous Materials*, in the Draft EIR and Response O-2.3 regarding the Electro Vector site specifically. As stated therein, this site is identified in the EIR and impacts related to hazardous materials would be less than significant with adherence to applicable regulations such as the California Health and Safety Code. For a full list of applicable regulations that the project would be required to comply with to reduce impacts to less than significant, please refer to the Regulatory Setting on page 4.9-4 of the Draft EIR.

For information regarding groundwater and actions required to protect groundwater sources, please refer to Section 4.10, *Hydrology and Water Quality,* of the Draft EIR.

Response 192.14

The commenter states that Rezoning Site FOR-4 is near two schools and may introduce additional airborne particulates and noise during construction.

Please refer to Section 4.3, *Air Quality,* of the Draft EIR. As discussed under Impact AQ-2, the BAAQMD 2017 *CEQA Air Quality Guidelines* Basic Construction Mitigation Measures would be required for all projects to reduce temporary construction impacts through implementation of Mitigation Measure AQ-1. In addition to implementation of Mitigation Measure AQ-1, for any project (regardless of whether the development is under the jurisdiction of the NSCAPCD or the BAAQMD) that meets certain conditions and as listed in **Error! Reference source not found.**, the County shall condition development facilitated b y the project on Rezoning Sites to implement BAAQMD *CEQA Air Quality Guidelines'* Additional Construction Mitigation Measures as described in Mitigation Measure AQ-2. Implementation of the required Mitigation Measures would reduce construction air quality impacts to a less than significant level.

Section 4.13, *Noise*, of the EIR analyzes noise levels. Impact NOI-1 discusses that construction noise would be subject to Mitigation NOI-1 through NOI-6, and that impacts would be less than significant with mitigation.

Response 192.15

The commenter expresses issues pertaining to drainage at the site and states that Van Keppel floods during heavy rains. The commenter states that extensive drainage work is needed if Rezoning Site FOR-4 is developed.

Please refer to Section 4.10, *Hydrology and Water Quality,* of the Draft EIR for detail pertaining to impacts of flooding induced by the proposed project. Refer to Figure 4.10-4, which shows that none of the Forestville Rezoning Sites (including FOR-4) are within Flood Hazard Zones. Furthermore, as stated in Impact HWQ-3 on page 4.10-26, the proposed project would alter drainage patterns and increase runoff at the Rezoning Sites, but would not result in increased flooding on or offsite, or exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts regarding flooding would be less than significant.

Response 192.16

The commenter states that neighbors of future development of Rezoning Site FOR-4 would be impacted by the building's height. The commenter states that development at this site would conflict with the character of the neighborhood.

Please refer to Response 192.8 regarding impacts to visual character.

Response 192.17

The commenter states that the proposed project is not appropriate for Forestville. The commenter requests that Rezoning Site FOR-4 be removed from consideration and that the remaining sites be amended to better reflect the character of the town, needs of current residents, and needs of future residents.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. The comment will be forwarded to decision-makers for consideration.

EIR Public Comment 193

COMMENTER: Audrey King

DATE: February 13, 2023

Response 193.1

The commenter expresses opposition to the Rezoning Site at 14156 Sunset Avenue (GUE-1) because of traffic safety and lack of water utilities.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites, and Response 193.2 and 193.3 regarding specific concerns with traffic safety and lack of water utilities.

Response 193.2

The commenter expresses concerns regarding traffic safety near the site. The commenter states that there is low visibility, that streets are narrow, and that pedestrian safety is an issue. The commenter states that without improvements, accidents will increase.

Refer to Master Response EXST regarding the existing condition (no sidewalks, street width, etc.) of the existing roads. Please refer to Section 4.18, *Transportation*, of the Draft EIR. As stated on page 4.16-18, the General Plan has several policies that require that design of future development prioritizes pedestrian safety and traffic safety. Compliance with these policies would ensure the proposed project has a less than significant impact.

Please refer to Master Response TRA for additional concerns regarding increased traffic.

Response 193.3

The commenter expresses concerns regarding the need for utilities such as water, sewage, and power. The commenter states that Sweetwater Springs intends to use the site for future water storage and expansion. The commenter states that it does not make sense to take land away from the water utility company.

Please refer to Section 4.18, *Utilities and Service Systems,* of the Draft EIR for a detailed analysis of the proposed project's impacts to the existing water supply, sewer system, and power. Please refer to Master Response UTIL for additional information regarding impacts to the sewer system.

The commenter's concerns regarding Sweetwater Springs' potential future expansion has been noted and passed onto decision-makers. Please refer to Master Response HE. Note that a site on the list of Rezoning Sites does not guarantee that the site will or will not be rezoned, as that decision is up to the decision-makers. Furthermore, once a site is rezoned, it may or may not be developed.

EIR Public Comment 194

COMMENTER: Barbara Delonno

DATE: February 13, 2023

Response 194.1

The commenter expresses opposition to the type of new development they are seeing in Santa Rosa stating that new developments are all attached lacking trees, yards, and privacy.

This comment is not relevant to the environmental impact analysis of the proposed project. This comment has been noted.

Response 194.2

The commenter expresses concerns regarding impacts to community character of Forestville. The commenter expresses the need for green space. The commenter expresses concerns regarding the lack of existing traffic control devices and commercial services in the area.

Please refer to Section 4.1, *Aesthetics,* of the Draft EIR. As stated therein, the proposed project may impact the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Regarding the existing lack of traffic control devices and commercial services, please refer to Master Response EXST. Note that these are existing conditions of the area and are not products of the proposed project.

Response 194.3

The commenter expresses opposition to a 50 percent increase in population in Forestville. The commenter asks why Forestville has been chosen for so much growth. The commenter states that new development will have adverse impacts to aesthetics and states their preference for keeping density at FOR-2 lower.

This comment has been noted. Please refer to Master Response EXST regarding existing services and infrastructure. The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter. Note that rezoning does not guarantee that development would occur.

The commenter's preference regarding maintaining a lower density at Rezoning Site FOR-2 has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Refer to Response 193.3 regarding aesthetic impacts.

Response 194.4

The commenter expresses their desire to see a "human habitat" that allows for adequate outdoor space, gardens, and courtyards for future residents.

This comment has been noted and passed onto decision-makers. Note that no development has been proposed for the selected Rezoning Sites and future development designs will be required to comply with the applicable County zoning regulations regarding required open space.

Response 194.5

The commenter asks if the proposed development really places new residents near jobs, transit, services, and schools. The commenter states that most people will need to drive due to inadequate bus services.

This comment has been noted. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria.

Response 194.6

The commenter expresses concerns regarding the availability of water and the impacts new development would have on water supply. The commenter asks if new development could rely on greywater systems to help with supply issues.

Please refer to Section 4.18, *Utilities and Service Systems,* for a detailed analysis of the proposed project's impacts on water supply.

Each water service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide water service to the Rezoning Sites. In addition, California American Water – Larkfield prepared a Water Supply Assessment (Appendix WSA) detailing its ability to provide water service to the Rezoning Sites within its service area. With the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites on the Agua Caliente, Glen Ellen, Larkfield, Sonoma, Santa Rosa, Forestville, Graton, Guerneville, Penngrove, and Petaluma Sites would have access to adequate water service. Information was not provided by California American Water – Geyserville. Furthermore, the Rezoning Sites that are not currently directly adjacent to water supply infrastructure (GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4) were not fully evaluated in Appendix WSS for adequate water supply capacity. As such, impacts of development on these sites would be significant and Mitigation Measure UTIL-1 would be required.

Mitigation Measure UTIL-1 requires that future development on the proposed Rezoning Sites would be required to demonstrate that the applicable water service provider has sufficient capacity to support future developments.

Note that Objective WR-4.1 of the County General Plan does aim to increase the use of recycled water where it meets all applicable regulatory standards and is the appropriate quality and quantity for the intended use.

Response 194.7

The commenter asks about the affordability of installing solar panels on new developments. The commenter states this could bring costs down.

The commenter's suggestion has been noted and passed onto decision-makers. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant

effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes affordability and homeowner costs. Whether individual developments would include solar panels would be determined by individual development proposals.

EIR Public Comment 195

COMMENTER: Bill Avelar

DATE: February 13, 2023

Response 195.1

The commenter expresses concerns regarding sewer capacity for the proposed Rezoning Sites in Forestville. The commenter states that development at the proposed Rezoning Sites will have adverse impacts to small town living, scenery, neighborly relationships, and the crime rate.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Please refer to Master Response UTIL regarding wastewater systems. As stated in Section 4.18, *Utilities and Service Systems*, on page 4.18-15 of the Draft EIR, "several of the Rezoning Sites are not adjacent to existing water or wastewater infrastructure and require further evaluation at the project level during the plan review and permit approval phase. Mitigation Measure UTIL-1 is required to reduce impacts related to water supply and wastewater system sufficiency." This mitigation measure would ensure future development would be adequately served by providers, except for sites GEY-1 through GEY-4.

Please refer to Section 4.1, *Aesthetics,* of the Draft EIR. As stated therein, the proposed project may impact the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Neighborhood relations and crime rates are not related to the analysis in the Draft EIR. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes neighborhood relations and crime rates.

EIR Public Comment 196

COMMENTER: Bob and Lucy Hardcastke

DATE: February 13, 2023

Response 196.1

The commenter states that Forestville cannot support future population growth. The commenter expresses concerns regarding traffic, road safety and existing road conditions.

Refer to Master Response EXST regarding existing challenges to roadway infrastructure, which are not caused by the project. Please refer to Section 4.18, *Transportation*, of the Draft EIR, and Master Response TRA for additional concerns regarding increased traffic.

EIR Public Comment 197

COMMENTER: Bonnie Smith

DATE: February 13, 2023

Response 197.1

The commenter expresses concern regarding the Rezoning Site proposed for Sunset Avenue (GUE-1). The commenter expresses concerns regarding traffic safety.

Please refer to Section 4.18, *Transportation*, of the Draft EIR. As stated on page 4.16-18, the General Plan has several policies that require that design of future development prioritizes pedestrian safety and traffic safety. Compliance with these policies would ensure the proposed project has a less than significant impact. Please refer to Master Response TRA for additional concerns regarding increased traffic.

EIR Public Comment 198

COMMENTER: Brenda C. Stivers

DATE: February 13, 2023

Response 198.1

The commenter expresses her opposition to rezoning properties in Guerneville, specifically GUE-2, GUE-3, and GUE-4, located off Armstrong Woods Road, which is a scenic corridor. The commenter states that residents should be included in the identification of viable housing sites. The commenter states that the DEIR notes many specific adverse effects that would impact the health and safety of current and future residents.

Please refer to Response 14.1.

Response 198.2

The commenter expresses the opinion that sites GUE-2 and GUE-3 are only accessible via one-lane roads that would require utility upgrades, upgrades which would result in road closures and severely impact emergency egress for residents. The commenter states that road work on Cutten Drive and Laughlin Road must be addressed before initiation of any construction activity, since heavy machinery would not be transported safely to these areas without causing severe access issues.

Refer to Response 14.2. Given that specific road widening locations have not been identified, it would be speculative to analyze potential impacts at this time. However, if it is determined that road widening is needed to access Rezoning Sites for future development, road widening would require site-specific CEQA compliance that could include additional mitigation measures for aesthetics, and biological resources, cultural and tribal cultural resources, among other issues.

Response 198.3

The commenter states that the lack of sidewalks or bicycle lanes poses as a safety hazard, and increasing the population would result in accidents and injuries.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure.

Please refer to Section 4.18, *Transportation*, of the Draft EIR. As stated on page 4.16-18, the General Plan has several policies that require that design of future development prioritizes pedestrian safety and traffic safety. Compliance with these policies would ensure the proposed project has a less than significant impact. Refer also to Impact TRA-1, which analyzes the project's impact to pedestrian facilities.

Response 198.4

The commenter states that sites GUE-2 and GUE-3 have inadequate potable water and sewer systems.

This comment has been noted. Please refer to Master Response UTIL regarding the project's impacts to the existing water and sewer systems.

Response 198.5

The commenter states that sites GUE-2 through 4 are located within a flood zone, high wildfire danger zone, liquefaction zone, and earthquake prone zone. The commenter states that residents in Guerneville are consistently on evacuation status due to floods, fires, and no electricity. The commenter expresses the opinion that the closest hospitals are 30 minutes away and the medical and policing services are inadequate and would not be able to accommodate the increase in population.

Refer to Response 14.4.

Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Master Response EMG regarding emergency evacuation and emergency access. For an analysis on impacts on police services, please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR.

Response 198.6

The commenter expresses the opinion that site GUE-3 would result in significant biological resource impacts since it would require the removal of redwoods, which is a known habitat for California Quail, California Grey Foxes, and Osprey. The commenter states that site GUE-3 is also located adjacent to agricultural uses, and Mitigation Measure AG-1 would require an agricultural protection buffer for future development.

Potential impacts to special-status species, including through habitat modification, are addressed under Impact BIO-1, beginning on page 4.4-28 of the Draft EIR. Please refer to Table 4.4-4, beginning on page 4.4-18 of the Draft EIR, for a list of special-status wildlife species with the potential to occur within the BSAs. As noted therein, the species mentioned by the commenter are not listed species. Impact BIO-1 includes mitigation measures for the reduction of potential impacts to special-status species, including preconstruction surveys for nesting birds and non-listed special-status species avoidance.

Please refer to Impact BIO-5, beginning on page 4.4-39 of the Draft EIR, regarding potential impacts associated with tree removal. As noted therein, compliance with County-required policies related to heritage trees and tree removal (which apply to all projects in the County, regardless of CEQA requirements) was determined to be adequate to reduce impacts to less than significant.

The commenter is correct in their assertion that implementation of Mitigation Measure AG-1 would be required for Rezoning Site GUE-3. As described in Table 4.2-4 in Section 4.2, *Agriculture and Forestry Resources,* of the Draft EIR, Rezoning Site GUE-3 is adjacent to agriculture.

Response 198.7

The commenter states that site sensitivity should be high and visual dominance should be dominant for site GUE-3 since a significant number of redwoods and valley oak would be removed for development. The commenter states Figure 4.1-5 of the DEIR is misleading since additional photos should show the immense valley view beauty which determines the visual character of Guerneville.

Table 4.1-4 on page 4.1-8 of the Draft EIR lists GUE-3 as co-dominant with a moderate site sensitivity. These features describe the existing conditions of the Rezoning Sites, and not the conditions of the sites after construction of speculative future development.

The site sensitivity criteria are described in Table 4.1-1 on page 4.1-2 of the Draft EIR. The criteria for moderate site sensitivity is:

1. Rural land use designation or urban designation that is not low sensitivity, but which has no scenic resource designation
2. May be near a gateway or include historic resources
3. Visible because of slope (less than 30 percent) or where significant aesthetic features are visible from public roads or public uses areas (parks, trails, etc.)

This is the appropriate site sensitivity designation for GUE-3 because the site does not have a scenic resource designation and contains significant aesthetic features visible from public roads.

Visual dominance definitions are provided on page 4.1-3 of the Draft EIR. The criteria for co-dominance is: project elements attract attention equally with other features and are compatible with surroundings. Because GUE-3 is similar to surrounding parcels, this designation is appropriate.

The commenter's concern regarding the photos presented in the Draft EIR has been noted.

Response 198.8

The commenter states that rezoning of sites GUE-2 through 4 are inconsistent with the goals and policies of the County General Plan, Bay Area 2050, and the Housing Element.

Please refer to Response 14.6.

Response 198.9

The commenter expresses her discontent for the lack of notification and inclusion in the early processes of the Housing Element Update and expresses her opposition to rezoning sites GUE-2 through 4.

Please refer to Response 14.7.

EIR Public Comment 199

COMMENTER: Burt Cohen

DATE: February 13, 2023

Response 199.1

The commenter expresses opposition to Rezoning Site FOR-2. The commenter expresses concerns regarding road safety, the lack of traffic control devices, and how an increase in population in the area may increase the number of traffic accidents. The commenter states there are no sidewalks and expresses concerns regarding pedestrian safety.

Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Refer also to Master Response EXST regarding current conditions of roadways that are not a result of the proposed project.

Please refer to Section 4.18, *Transportation*, of the Draft EIR. As stated on page 4.16-18, the General Plan has several policies that require that design of future development prioritizes pedestrian safety and traffic safety. Compliance with these policies would ensure the proposed project has a less than significant impact.

Response 199.2

The commenter states that they have questions about sewage, water drainage, fire safety, evacuations, and more. The commenter states that the proposed project will impact the safety of existing residents and severely change Forestville.

This comment has been noted. Please refer to Master Response UTIL regarding impacts to the existing sewer system. Please refer to Master Response FIRE and Master Response EMG regarding wildfire risk and emergency evacuation.

Please refer to Section 4.10, *Hydrology and Water Quality,* of the Draft regarding impacts to site drainage. As stated in Impact HWQ-3 on page 4.10-26, the proposed project would alter drainage patters and increase runoff at the Rezoning Sites, but would not result in increased flooding on or offsite, or exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts regarding flooding and drainage would be less than significant.

EIR Public Comment 200

COMMENTER: Charles and Anne Watson

DATE: February 13, 2023

Response 200.1

The commenter expresses opposition to approval of the Draft EIR and proposed Rezoning Sites in Glen Ellen. The commenter states that Glen Ellen does not fit the state's definition of an "urban growth area."

Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Please refer to Page xviii of the Draft EIR. An "Urban Growth Boundary" is defined as:

> A voter designated limit to the urban development of a city.

An "Urban Service Area" is defined as:

> The geographical area within the Urban Service Boundary that is designated for urban development in the Land Use Element of the County's General Plan.

Please note that there is no reference to an "Urban Growth Area" nor is there an accepted state definition of the term "Urban Growth Area."

EIR Public Comment 201

COMMENTER: Chris Romano

DATE: February 13, 2023

Response 201.1

The commenter expresses frustration with the lack of communication between the County and community members regarding the proposed project. The commenter expresses opposition to the Rezoning Sites proposed for Guerneville.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 201.2

The commenter states that there was no meaningful community consultation conducted by the County.

This comment is noted and has been passed on to the decision-makers. Refer to Master Response SITE regarding how the rezoning sites were chosen.

Response 201.3

The commenter states that Sweetwater Springs are the owners of the Rezoning Site located on Sunset Avenue and are in opposition to the proposed rezoning. The commenter states that Sweetwater Springs is in support of leaving the site vacant for future water expansion.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 201.4

The commenter states that the proposed project places a disproportionate load of new housing in the Guerneville area.

This comment is noted and will be passed on to decision-makers. Please refer to Master Response SITE regarding the site selection process.

Response 201.5

The commenter expresses concerns regarding the existing conditions of roads in the area and states Guerneville is lacking needed road infrastructure, especially along Sunset Avenue (vicinity of GUE-1).

This comment has been noted. Please refer to Master Response EXST regarding existing conditions, including road conditions.

Response 201.6

The commenter expresses concerns regarding wildfire risk and emergency evacuation.

This comment has been noted. Please refer to Master Response FIRE and Master Response EMG regarding wildfire risk and emergency evacuation.

Response 201.7

The commenter expresses concerns regarding the direct impact of development on the surrounding neighborhoods and noise. The commenter states that new development would not include yards for recreation, that the site is too steep, and there is not adequate parking available.

Regarding community character, please refer to Section 4.1, *Aesthetics,* of the Draft EIR. As stated therein, the proposed project may impact the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Please refer to Section 4.13, *Noise,* of the Draft EIR regarding noise impacts related to the construction and operation of development facilitated by the project on Rezoning Sites. With implementation of Mitigation Measures NOI-1 through NOI-7, noise impacts would be less than significant. Refer to Impact PS-4 regarding impacts related to recreation. The County requires payment of in-lieu fees or dedication of park land (pursuant to Sonoma County Code Section 25-58 and 25-58.1) and a parks impact fee (pursuant to Sonoma County Code Section 20-65) to offset impacts related to increased demand at existing recreation facilities, and project applicant(s) of the Rezoning Sites would be required to comply with these codes during the permit approval process. The project is not anticipated to result in the need for new or physically altered parks or recreational facilities and would not result in substantial physical deterioration of existing parks.

Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

EIR Public Comment 202

COMMENTER: Christine Johansson

DATE: February 13, 2023

Response 202.1

The commenter expresses support for affordable housing. The commenter asserts that existing infrastructure would not support larger projects, including existing roadways.

This comment has been noted. Please refer to Master Response EXST for information regarding the existing conditions of services and infrastructure.

Response 202.2

The commenter asserts that existing sewer and water systems are not adequate to serve proposed development, and that flooding is a concern.

This comment has been noted. Please refer to Master Response UTIL regarding the adequacy of sewer and water systems for the proposed project, and Master Response EXST regarding concerns about the existing sewer and water systems and existing flooding. Potential flooding impacts are addressed Section 4.9, *Hydrology and Water Quality*, of the EIR.

Response 202.3

The commenter expresses concerns regarding safety related to evacuation. The commenter notes that existing roads are in disrepair, with only one road providing ingress/egress to an area.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation and access.

Response 202.4

The commenter states that there has been little oversight in the County regarding short-term rentals. The commenter suggests that the County put a moratorium on all new short-term rentals until other County housing goals have been achieved.

This comment has been noted and passed onto decision-makers. Note that this comment is not relevant to the environmental impact analysis presented for the proposed project.

Response 202.5

The commenter asks if the County has put effort into making it easier for residents to add ADUs to their properties. The commenter asks if this process could be streamlined.

This comment has been noted and passed onto decision-makers. It does not pertain to the impact analysis in the Draft EIR.

Response 202.6

The commenter states that septic and the existing sewage system may present issues. The commenter states that the County had been looking into allowing composting toilets, and that the commenter believes using newer technology would be a big help.

This comment has been noted and passed onto decision-makers. Please refer to Master Response UTIL for concerns regarding the existing sewer and water systems. The comment related to composting toilets has been noted and passed onto decision-makers. It does not pertain to the impact analysis in the Draft EIR. Note also that development facilitated by the project on Rezoning Sites would not require the use of septic tanks or alternative wastewater disposal systems, as described on page 4.7-28 of the Draft EIR.

Response 202.7

The commenter asks how much research has been done by the County regarding redevelopment of existing structures. The commenter states there are lots in Guerneville that could be redeveloped into multi-unit homes.

This comment has been noted and passed onto decision-makers. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria.

Response 202.8

The commenter asks that the County get more creative with their housing locations and building sizes. The commenter notes that their community presents limitations. The commenter asks that more opportunities to voice opinions and ideas be offered to community members before further steps are taken.

This comment has been noted. Please refer to Master Response SITE in reference to the Rezoning Site selection process and criteria. Regarding additional time for community input, the comment has been noted and passed onto decision-makers.

EIR Public Comment 203

COMMENTER: Cynthia Berman

DATE: February 13, 2023

Response 203.1

The commenter expresses opposition to the proposed project.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 203.2

The commenter states that Guerneville and Forestville do not have the infrastructure to support the proposed project. The commenter expresses concerns regarding floods, fires, and existing roads.

This comment has been noted. For concerns regarding flood, fires, and roads, please refer to Response 14.4. The sites in Forestville are not within a Fire Hazard Severity Zone, as shown in Table 4.19-2, but are within two miles of a Very High Fire Hazard Severity Zone. Reer to Section 4.19, *Wildfire* of the EIR for more information. Regarding existing infrastructure, please refer to Master Response EXST.

Response 203.3

The commenter expresses concerns regarding increased traffic and emergency evacuation. The commenter expresses opposition to the number of new cars and the amount of parking needed to support future development.

This comment is noted. Please refer to Master Response TRA regarding traffic and Master Response EMG regarding emergency evacuation.

EIR Public Comment 204

COMMENTER: Dan and Sunoma Northern

DATE: February 13, 2023

Response 204.1

The commenter asserts that the Draft EIR does not adequately analyze how individual parcels meet the HCD Guidelines for Low Income Housing.

This comment pertains to the Housing Element and is not related to analysis within the Draft EIR. The Draft EIR is not required to analyze how individual parcels are consistent with HCD Guidelines for Low Income Housing. This comment has been passed on to County decision-makers. Please note that the adequacy of sites for lower income housing is discussed in Appendix D of the Housing Element, and the Technical Background Report contains a Fair Housing Analysis in Section 4.5.

Response 204.2

The commenter expresses concerns about existing public transportation and asks what mitigation measures will be used to improve public transportation.

Please refer to Master Response EXST regarding existing conditions, including public transportation. The existing lack of adequate public transportation is a currently existing baseline condition, not one caused by the proposed project. CEQA is laid out in Section 21000 et seq of the According to the California Code of Regulations Public Resources Code (PRC). Section 21002 lays out the intent that the procedures assist lead agencies in "systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." CEQA, therefore, is focused on mitigation measures that reduce significant effects of projects under consideration, not measures to mitigate existing conditions not resulting from a project.

Response 204.3

The commenter suggests contamination on site FOR-1 should be examined and asks if contamination can be mitigated for the site to be safely developed.

Please see Section 4.9, *Hazards and Hazardous Materials* regarding site-related hazard remediation. Sites with hazardous materials near the Rezoning Sites (including site FOR-1, which is identified as containing the Electro Vector site) are listed in Table 4.9-2. While a full evaluation and analysis of specific contamination case on FOR-1 is not appropriate in a programmatic EIR, in the discussion of Impact HAZ-2, the EIR states that "[d]evelopment typically within 0.25 mile of sites identified in Table 4.9-2 would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board, the Sonoma County Local Oversight Program, or DTSC, before construction activities could begin. The agency responsible for oversight would determine the types of remediation and cleanup required, and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells onsite with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants." Compliance with existing State and local regulations regarding onsite hazards would reduce impacts to less than significant.

Response 204.4

The commenter states that site FOR-6 is currently zoned industrial and asks if residential is the best rezoning designation.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. For more information on Rezoning Site selection, please refer to Master Response SITE. The EIR analyzes the project as proposed, and the final decision on rezoning is up to County decision-makers. This comment will be sent to the decision-makers for consideration.

Response 204.5

The commenter asks what mitigation will be implemented to ensure privately owned parks are not overused and degraded.

Refer to Impact PS-4 regarding impacts related to recreation. The County requires payment of park fees and parkland dedication or in-lieu fees (per Sonoma County Code Section 20-65), offsetting any impacts related to increased demand at existing recreation facilities, and project applicant(s) of the Rezoning Sites would be required to pay this during the permit approval process. The project is not anticipated to result in the need for new or physically altered parks or recreational facilities and would not result in substantial physical deterioration of existing parks.

Response 204.6

The commenter states that site FOR-1 has known groundwater contamination.

Refer to Response 204.3. No changes are suggested by the commenter, nor are any changes required to the EIR, as the EIR acknowledges this existing condition.

Response 204.7

The commenter expresses concerns about site FOR-2 including stormwater runoff, traffic safety, lack of crosswalks, proximity to High and Moderate FHSZ and SRAs, evacuation plans, wastewater, and ownership.

For information regarding stormwater runoff, please refer to Section 4.10, *Hydrology and Water Quality,* of the Draft EIR. As stated in Impact HWQ-3 on page 4.10-26, the proposed project would alter drainage patterns and increase runoff at the Rezoning Sites, but would not result in increased flooding on or offsite or exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts regarding flooding and drainage would be less than significant.

Regarding traffic safety, please refer to Impact TRA-2 in Section 4.16, *Transportation,* of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

Regarding impacts to the existing wastewater system, please refer to Master Response UTIL. For concerns regarding wildfire risk and emergency evacuation, please refer to Master Response FIRE and Master Response EMG, as well as Section 4.19, *Wildfire*, where Table 4.19-2 acknowledges that while FOR-2 is not within a Fire Hazard Severity Zone, it is within one mile of a Very High Fire Hazard Severity Zone. Please refer to Master Response EXST regarding the existing conditions of traffic control devices in the area, such as crosswalks, and the current ownership of each parcel. In addition, please refer to Master Response HE.

Regarding the intent of a property owner to sell the property, this comment has been noted. It does not pertain to the analysis or conclusions in the EIR. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes analysis of a property owner's estate planning.

Response 204.8

The commenter states that site FOR-4 is only accessible through an adjacent property.

This comment has been noted. Refer to Response 130.2.

Response 204.9

The commenter states that a skatepark and emergency center are planned for sites FOR-3 or FOR-5. The commenter states that sites FOR-3 and FOR-5 are within 300 feet of a wastewater treatment plant and expresses concerns about environmental justice.

This comment is noted. Please refer to Master Response SITE and Master Response HE for additional detail on the Rezoning Site selection process and conditions of the proposed project. As stated in Master Response HE, a site on the list of Rezoning sites does not guarantee that the site will or will not be rezoned, as that decision is up to the decision-makers. Furthermore, once a site is rezoned, it may or may not be developed.

Regarding the proximity of Rezoning Sites FOR-3 and FOR-5 to an existing wastewater treatment, the commenter does not specify what type of environmental justice issue they are describing. Regarding potential air quality impacts for future development at these sites, please refer to Section 4.3, *Air Quality,* of the Draft EIR, including odors, which are covered under Impact AQ-4. Regarding future residents' exposure to noise, please refer to Section 4.13, *Noise.* Environmental justice is not a specific topic required to be studied under CEQA.

Response 204.10

The commenter states that site FOR-6 is currently zoned industrial and states that rezoning will limit job opportunities.

Refer to Response 204.4.

Response 204.11

The commenter states that site FOR-6 is adjacent to a wastewater treatment plant and expresses concerns about environmental justice.

Please refer to Response 204.9.

Response 204.12

The commenter expresses concerns about community character and availability of space to develop business, commercial and industrial uses after the Housing Element Update is adopted, and that Forestville was not represented on the Housing Advisory Committee.

Regarding community character, please refer to Section 4.1, *Aesthetics,* of the Draft EIR. As stated therein, the proposed project may impact the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity.

Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Regarding the commenter's speculation about the parcel's potential future as commercial or industrial spaces, please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria.

District 5, which includes Forestville, was represented on the Housing Advisory Committee.

Response 204.13

The commenter states that the Draft EIR must include mitigation measures, reduce densities or consider alternatives. The commenter suggests it would be helpful to include a matrix rating for each site based on the HCD Guidelines.

This comment is noted. Please refer to each Draft EIR section for the required mitigation for each impact area. Please refer to Section 5, *Alternatives,* for information regarding alternatives that were considered but not selected and the reasoning for each. The EIR includes a reasonable range of alternatives, and a lower density alternative is included in Section 6.4, *Alternatives Considered but Rejected*. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Refer to Appendix D of the Housing Element for a detailed analysis of the housing sites inventory.

Response 204.14

The commenter states concern about traffic, street and road maintenance, and pedestrian safety.

This comment has been noted. Please refer to Master Response TRA regarding concerns about traffic. Regarding road maintenance, please refer to Master Response EXST. The existing conditions of roads is not a result of the proposed project.

Regarding traffic and pedestrian safety, please refer to Response 204.7.

Response 204.15

The commenter quotes from the Housing Element Site Inventory Guidebook and states concern for a density of 20 units per acre.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Refer to Appendix D of the Housing Element. As stated on the HCD Building Blocks website under Analysis of Sites and Zoning, "[s]uburban jurisdictions include cities and counties located within a Metropolitan Statistical Area (MSA) and have a population of less than 2 million" and the website specifically lists Sonoma County as falling into this category.

Response 204.16

The commenter states that site-specific density information should be incorporated into the EIR.

This comment has been noted. Please refer to the Draft EIR. Please note that the Draft EIR is a programmatic EIR evaluating the rezoning of each of the Rezoning Sites and the potential impacts of increasing the density at each site. The Draft EIR does not evaluate specific development at each site, as

development has not yet been proposed. In addition, the Draft EIR does refer to specific sites and their associated impacts in each section as appropriate. The DEIR looks at the maximum buildout that could be allowed under the rezoning in order to evaluate the worst-case scenario regarding the maximum environmental impacts that may occur.

Response 204.17

The commenter expresses that there is confusion regarding site FOR-7 and states that it is mentioned in the EIR but does not appear to be a rezoning parcel. The commenter asks if it should be removed from the Draft EIR or if rezoning information should be added.

The commenter is correct that FOR-7 is not a Rezoning Site, as shown in Table 2-2. Please refer to Table 2-5 in Section 2, *Project Description,* of the Draft EIR. As stated therein, **Error! Reference source not found.** identifies the dwelling unit and population buildout potential of the 20 additional inventory sites that would not be rezoned under implementation of the project. Sites in Table 2-5, such as Rezoning Site FOR-7, are included for informational purposes because they are proposed to be included in the Housing Element Site Inventory based on their existing zoning, but were not analyzed for rezoning for the purposes of the proposed project.

Response 204.18

The commenter disputes analysis in the Population and Housing section of the EIR and states that infrastructure improvements will be required to accommodate population growth including traffic mitigation, a roundabout, and an entrance/exit to State Highway 116. The commenter also states that there is a known wastewater pipeline issue under Highway 116.

Please refer to Master Response TRA regarding traffic congestion. As described therein, no near-term congestion improvements would be necessary as a result of the project, including for the SR 116/Mirabel Road intersection, which meets the signal warrant analysis at full buildout of the Rezoning Sites; however, fair share funding of cumulative scenario traffic congestion improvements would be necessary. The County collects countywide traffic development fees pursuant to Article 98 of Chapter 26 of the Sonoma County Code. The payment of these fees by each individual project would contribute to alleviating cumulative roadway deterioration impacts to the regional road network. Please refer to Master Response EXST regarding the existing conditions of roads, infrastructure, and services.

Response 204.19

The commenter suggests that the Draft EIR should be updated to reflect impacts to Forestville due to unplanned population growth and requests that the EIR specify what information is from public records or other sources.

Please refer to Section 4.14, *Population and Housing*, of the Draft EIR. As stated under Impact PH-1, "substantial" population growth is defined as growth exceeding ABAG/MTC population forecasts for the unincorporated County or exceeding the County's forecasted population and associated housing needs.

Although the proposed project would increase the buildout potential beyond that anticipated in the current General Plan, the project would not exceed the ABAG 2040 population projections or the County's housing requirement under the 6th cycle RHNA allocation for the 2023-2031 planning period. Furthermore, as the growth resulting from the project is anticipated and evaluated throughout this Program EIR, and the project would be adopted as an integral part of the County's General Plan following a planning process, the population growth resulting from the project would not be unplanned.

Section 7, *References*, of the EIR contains the sources and documents consulted during the preparation of the EIR.

Response 204.20

The commenter notes that the Draft EIR determined that decreases in enrollment are anticipated with the exception of Forestville Elementary and Geyserville Unified School Districts and states more explanation or mitigation should address potential impacts to Forestville Elementary.

This comment is noted. Please refer to Section 4.15, *Public Services and Recreation,* of the Draft EIR. Refer to Response 94.2 regarding Forestville schools.

EIR Public Comment 205

COMMENTER: Dane Riley

DATE: February 13, 2023

Response 205.1

The commenter expresses opposition to the Rezoning Site located at 6898 Nolan Road (FOR-2). The commenter expresses concerns regarding the availability of parking, road safety and road width, and emergency access to the site. The commenter states there are very few jobs in Forestville and public transit is infrequent.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Master Response EMG regarding emergency evacuation and emergency access.

Please refer to Master Response EXST regarding the existing conditions of services and infrastructure such as parking, road width, transit, and road safety. Please note that the existing conditions of each of these areas are not a product of the proposed project. Also, note that parking is not a discussion topic required to be evaluated under CEQA.

EIR Public Comment 206

COMMENTER: Daniel Bontecou

DATE: February 13, 2023

Response 206.1

The commenter expresses concern over adding 635 new units to Forestville because it would negatively impact the character, quality of life, and health of the town.

Regarding community character, please refer to Section 4.1, *Aesthetics,* of the Draft EIR. As stated therein, the proposed project may impact the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

The commenter does not specify the type of health impacts they are referring to. For information regarding impacts to air quality, please refer to Section 4.3, *Air Quality,* of the Draft EIR. For information regarding impacts to hazards please refer to Section 4.9, *Hazards and Hazardous Materials,* of the Draft EIR. For information regarding impacts to noise, please refer to Section 4.13, *Noise,* of the Draft EIR.

Quality of life is not related to the analysis in the Draft EIR. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes general quality of life.

Response 206.2

The commenter expresses concern over the proposed expansion of Forestville's population by 50 percent and states this will put a strain on the town's schools, infrastructure, and emergency services.

Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Section 4.15, *Public Services and* Recreation, of the Draft EIR for an analysis of the project's impact to schools, police services, and fire services. Please refer to Master Response EMG for additional information regarding emergency access and emergency evacuation.

The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter. Note that rezoning does not guarantee that development would occur.

Response 206.3

The commenter states that this proposed rapid expansion will impact the town's character, "small town charm", and the current lack of traffic in the downtown area.

Please refer to Master Response TRA regarding concerns about traffic. Regarding community character, please refer Response 206.1.

Response 206.4

The commenter states an opinion that not one person in Forestville wants this expansion to happen and hopes this is argument enough to stop this proposal. The commenter states that it is paramount to have residents be heard in this process. The commenter states this should not be done over a Zoom meeting that most do not know about.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 206.5

The commenter expresses concern over sewage treatment. The commenter states it is crucial to have proper sewage processing facilities to avoid contamination of the Russian River. The commenter asks where a new sewage treatment facility will be built and how waste will be handled from all 6 of the proposed rezone sites throughout Forestville.

Please refer to Master Response UTIL and Section 4.18, *Utilities and Service Systems,* of the Draft EIR for a detailed analysis of the project's impact on the sewer system.

Response 206.6

The commenter expresses concern over the availability of water. The commenter asks where the water will come from to meet the additional demand brought on by the addition of 635 dwelling units.

Please refer to Section 4.18, *Utilities and Service Systems,* of the Draft EIR for a detailed analysis of the project's impact on the water supply.

Each water service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide water service to the Rezoning Sites. In addition, California American Water – Larkfield prepared a Water Supply Assessment (Appendix WSA) detailing its ability to provide water service to the Rezoning Sites within its service area. With the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites on the Agua Caliente, Glen Ellen, Larkfield, Sonoma, Santa Rosa, Forestville, Graton, Guerneville, Penngrove, and Petaluma Sites would have access to adequate water service. Information was not provided by California American Water – Geyserville. Furthermore, the Rezoning Sites that are not currently directly adjacent to water supply infrastructure (GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4) were not fully evaluated in Appendix WSS for adequate water supply capacity. As such, the impacts of development on these sites would be significant and Mitigation Measure UTIL-1 would be required.

Mitigation Measure UTIL-1 requires that future development on the proposed Rezoning Sites would be required to demonstrate that the applicable water service provider has sufficient capacity to support future developments.

Response 206.7

The commenter states that they strongly believe the proposed project will have a profound and negative impact on Forestville and urges decision-makers to consider resident's concerns and reject this proposal.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

EIR Public Comment 207

COMMENTER: Dave Doty

DATE: February 13, 2023

Response 207.1

The commenter asks why the proposed units in Forestville have to be half a mile from the town center.

This comment has been noted. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria.

Response 207.2

The commenter asks why there were no units proposed for Healdsburg or Sebastopol.

This comment has been noted. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Sebastopol, Healdsburg, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements.

Response 207.3

The commenter asks why the number of housing units and potential new residents capped at a reasonable percentage of the current Forestville population.

This comment has been noted. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria. The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase.

Response 207.4

The commenter states that adding 635 residential units will require doubling of the sewer plant and some of the proposed rezone sites are on land that would be needed for sewer plant expansion.

This comment has been noted. Please refer to Master Response UTIL regarding impacts to the existing sewer system.

EIR Public Comment 208

COMMENTER: Dave Gebow

DATE: February 13, 2023

Response 208.1

The commenter expresses concern over the rezoning of site GUE-1 because it would change the quiet nature of the neighborhood near the site.

The commenter's opinion is noted. Refer to Master Response HE regarding expressions of opinion regarding the project, and Master Response EXST regarding existing conditions in the County.

Response 208.2

The commenter states that Woodland Avenue, Sunset Avenue and the entire Highland Hill area is made up of shoulder-less one lane roads that could not support 50-80 more cars in the neighborhood.

Refer to Master Response EXST regarding existing single lane roads. Refer to Master Response TRA regarding traffic congestion.

Response 208.3

The commenter expresses concern over evacuations. The commenter states currently people park illegally on the streets in the Highland Hills Area and garbage trucks have a hard time getting through. The commenter expresses concern about the ability for emergency vehicles to use these streets with the addition of more people and cars.

Refer to Master Response EXST regarding the existing amount of vehicles, parking, and evacuation concerns, as this is a current situation not caused by the proposed project. Refer to Master Response EMG regarding the emergency evacuation.

Response 208.4

The commenter expresses concern over pedestrian accessibility. The commenter states that Woodland Avenue, Sunset Avenue, and Palo alto Road are all steep. The commenter states an opinion that physically challenged/disabled people would not be able to make the hike up these roads.

Refer to Master Response EXST regarding the existing pedestrian accessibility of the neighborhood, as this is a current situation not caused by the proposed project.

Response 208.5

The commenter references the Fife Creek Commons development recently built in Guerneville as an example of a site that is appropriate because it is walkable, accessible, disabled-friendly, and has plenty of parking. The commenter states that in contrast site GUE-1 is not appropriate because it lacks all of these qualities.

The commenter's opinion is noted and will be passed on to the decision-makers. Refer to Master Response HE regarding opinions on the project.

EIR Public Comment 209

COMMENTER: David Goldstein

DATE: February 13, 2023

Response 209.1

The commenter expresses concern over water supply for new development and asks where the water will come from for new units.

Refer to Master Response UTIL regarding water. The Draft EIR addressed water supply availability in Section 4.18, *Utilities and Service Systems*.

Response 209.2

The commenter expresses concern over traffic caused by new residents and asks if the new restaurant and brewery along Highway 116 were taken into consideration when evaluating traffic impacts.

Refer to Master Response TRA regarding traffic congestion. As stated therein, "LOS impacts are no longer considered significant impacts under CEQA; therefore, traffic congestion-related mitigation measures are not required. Therefore, traffic congestion was not analyzed in the Draft EIR based on this state law. Refer to Section 4.16, *Transportation*, of the EIR for more transportation analysis. However, Appendix TRA of the Draft EIR includes an LOS-based congestion analysis for informational purposes."

EIR Public Comment 210

COMMENTER: Dennis O'Rorke

DATE: February 13, 2023

Response 210.1

The commenter asks decision-makers to not add more housing in flood prone areas and asks that they do not allow gentrification housing.

The commenter does not state what housing site they are commenting on, but information regarding flooding can be found in Section 4.10, *Hydrology and Water Quality*. Of the 59 sites, seven sites are partially within the 100-year floodplain: GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, PEN-9, and LAR-9. As analyzed under Impact HWQ-4, "[f]or the sites partially within the 100-year floodplain, development would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. This includes achieving zero net fill within these sites following development, avoiding fill in areas that retain flood waters, and requiring review and approval of proposed drainage facilities by Permit Sonoma. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. Therefore, increased flooding on adjacent parcels to the Rezoning Sites would not occur because of the project."

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes potential gentrification.

EIR Public Comment 211

COMMENTER: Dennis Sharp

DATE: February 13, 2023

Response 211.1

The commenter states that proposing a high percentage increase in the housing density of Forestville is irresponsible because it will put a strain on local schools and required services and create downtown traffic problems.

This comment has been noted. Impacts to schools are analyzed in Section 4.15, *Public Services and Recreation*, under Impact PS-3. As stated therein, "development facilitated by the project on Rezoning Sites would generate approximately 1,145 school-aged children across 11 school districts in the County." Based on the projected decline in enrollment across school districts serving the Rezoning Sites and the estimated 1,145 new school-aged children that would result from development associated with rezoning under implementation of the project, most of the school districts would be able to absorb new and incoming students because the increases in the student population are not greater than the anticipated decreases in enrollment (with the exception of Forestville Elementary and Geyserville Unified School Districts). Based on Table 4.15-6, Forestville Elementary may see an increase of 54 students. Applicants would pay school impact fees at the time building permits are issued, to be used by Sonoma County School Districts to mitigate impacts with long-term maintenance and operation of school facilities. This impact would be less than significant, as stated in the EIR.

Please refer to Master Response TRA regarding traffic concerns.

EIR Public Comment 212

COMMENTER: Diana Hindley

DATE: February 13, 2023

Response 212.1

The commenter opposes the rezoning of GLE-1 and GLE-2 in Glen Ellen.

Please refer to Master HE regarding opposition to the Housing Element.

Response 212.2

The commenter states that the rezoning of GLE-1 and GLE-2 is unacceptable because it would have negative traffic and safety impacts, would increase noise and pollution, would remove carbon sequestering trees, lead to loss of community character, and that the area lacks local services, jobs, and public transportation. The commenter also states that the project is at odds with the General Plan policies and Glen Ellen Development Guidelines.

Please refer to Master Response TRA regarding traffic impacts and Master Response EMG regarding emergency access. Refer to Master Response EXST regarding existing lack of local services, job, and public transit. Please refer to Section 4.13, *Noise*, and Section 4.3, *Air Quality,* for analysis of potential noise and air quality impacts. As discussed therein, impacts related to noise and air quality would be potentially significant, and mitigation measures would reduce impacts to less than significant. Please refer to Section 4.8, *Greenhouse Gas Emissions,* which concludes that development facilitated by the project on Rezoning Sites would be consistent with the goals of the 2017 Scoping Plan, the Association of bay Area Governments Plan Bay Area 2040, the County's General Plan, and the County's Climate Change Action Resolution.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, including local services and jobs. Refer to Section 4.16, *Transportation,* for discussion regarding the project's impacts to public transportation; as discussed therein, the project would not cause significant adverse impacts to public transit.

Please refer to Table 4.11-3 in Section 4.11, *Land Use and Planning,* for an analysis of the project's consistency with the County's General Plan. As demonstrated in Table 4.11-3, the proposed rezoning sites would be generally consistent with the General Plan and would be required to comply with the Glen Ellen Development and Design Guidelines.

Response 212.3

The commenter states that rezoning would cause irreparable long term damage and urges that parcels GLE-1 and GLE-2 be removed from the rezoning sites.

Please refer to Master Response HE regarding opposition to the Housing Element.

EIR Public Comment 213

COMMENTER: Don Jackson

DATE: February 13, 2023

Response 213.1

The commenter expresses their opposition to the proposed housing in Forestville and surrounding areas of the DEIR.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 213.2

The commenter states that they understand that the State and ABAG mandates the increase in high-density housing in Sonoma County, and mentions that Permit Sonoma lost the case against high number of units in rural Sonoma County.

This comment is noted and will be passed on to decision-makers for their consideration.

Response 213.3

The commenter states that the Housing Element Update would result in uncontrolled growth by more than doubling the downtown population in Forestville, leading to negative impacts on culture, personality, and functioning of the town.

This comment is noted and will be passed on to decision-makers for their consideration. Please also note that the change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter.

Response 213.4

The commenter states that a notice for the Housing Element Update should be provided to the entire community instead of just for residents within 300 feet of proposed development parcels.

This comment is noted and will be passed on to decision-makers for their consideration.

Response 213.5

The commenter states that population growth in Guerneville would substantially impact vehicular traffic on River Road which would worsen during the summer or in the event of an emergency.

Please refer to Master Response TRA regarding traffic congestion and Master Response EMG regarding emergency access.

Response 213.6

The commenter states that the addition of 1,625 people to downtown Forestville would result in congestion on Highway 116 and would increase carbon dioxide emissions within the community.

As discussed in Section 4.8, *Greenhouse Gas Emissions,* beginning on page 4.8-17, GHG emissions generated during project operation would result primarily from energy usage in buildings and fuel consumption associated with light-duty vehicles. Although the County of Sonoma does not have a qualified GHG-reduction plan, there are some proposed Housing Element policies that would assist in reducing emissions. Specifically, Policy HE-3e would reduce GHG emissions through the encouragement of infill development, ultimately reducing VMT. Policies HE-3g and HE-5d would focus development in areas well-served by existing transit, which would also reduce GHG emissions by reducing VMT. Similarly, Policy HE-6f focuses on the provision of high-quality public transportation. Policies HE-6a and HE-6b would promote the conservation of energy and energy efficiency in both new and existing development, which would reduce GHG emissions by reducing overall energy usage. Refer also to Section 4.16, *Transportation*, of the EIR regarding an analysis of the VMT impacts of the project.

Response 213.7

The commenter expresses the opinion that even if all future residents utilized electric vehicles to reduce GHGs, there would be substantial impacts to peak electricity and the electrical grid.

As discussed in Section 4.6, *Energy,* beginning on page 4.6-11, development facilitated by the project on Rezoning Sites would consume approximately 216,623,500 kilowatt-hours (kWh), or 56,719 millions of British thermal units (MMBtu) per year of electricity for lighting and large appliances, and approximately 86,468,600 thousands of British thermal units (kBtu), or 86,469 MMBtu per year of natural gas for heating and cooking (see Appendix AQ for CalEEMod results). Electricity would be provided by SCP (the default electricity provider in the County) and/or PG&E. SCP provides electricity from cleaner power sources with lower GHG emissions than PG&E, although customers can opt out of SCP service and be provided electricity from PG&E. Development facilitated by the project on Rezoning Sites would also be required to comply with the latest version of CalGreen which would require efficient household fixtures and energy efficiency measures.

Response 213.8

The commenter questions where children will go to school.

As discussed in Section 4.15, *Public Services and Recreation,* based on school-age population statistics provided by the United States Census Bureau, development facilitated by the project on Rezoning Sites would generate approximately 1,145 school-aged children across 11 school districts in the County. The analysis conservatively assumed that all school-aged children would attend public schools.

Response 213.9

The commenter wonders what will be done to upgrade or enhance the local fire department, police department, water, and sewer systems. He expresses the opinion that service infrastructure should be put in place before units are constructed.

Please refer to Master Response UTIL regarding utility availability. Regarding fire department and police department upgrades, the analysis within the Draft EIR in Section 4.15, *Public Services and Recreation,* determined that both fire and police departments would be able to maintain acceptable service ratio response times and would not require the construction of new or upgraded facilities.

Response 213.10

The commenter states that construction of the proposed projects would disrupt the community and would worsen traffic.

This comment is noted and will be forwarded to decision-makers for their consideration. Refer to Master Response TRA regarding traffic congestion. Construction-related impacts are analyzed throughout the EIR.

Response 213.11

The commenter states that Forestville currently has a population of 3,255, and the addition of 1,625 new residents under the Housing Element Update would be approximately 51 percent of the current population. The commenter expresses the opinion that 1,625 new residents would only make up 0.33 percent of the population for Santa Rosa, which has more resources to accommodate the new residents.

The commenter is comparing the population of Forestville with the population of the entire County, including those who live in cities, with their own RHNA allocations and housing elements. Santa Rosa, for example, has a separate RHNA requirement. Additionally, the change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter. This comment is noted and will be passed on to decision-makers for their consideration.

EIR Public Comment 214

COMMENTER: Elizabeth Westerfield

DATE: February 13, 2023

Response 214.1

The commenter expresses concernregarding rezone sites FOR 1 through 6 in Forestville with specific questions and concerns about FOR 2. The commenter states that Mirabel Road is the only thoroughfare from River Road to Highway 116, and the proposed project would result in unsafe flow of traffic entering and exiting Mirabel Road.

Please refer to Master Response TRA regarding traffic congestion.

Response 214.2

The commenter states that Mirabel Road only has one sidewalk on one side of the street heading towards downtown from the Youth Park, and expresses her concern regarding pedestrian safety.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Response 123.3 for additional information regarding traffic, traffic safety, and pedestrian safety.

Response 214.3

The commenter states that Forestville has very limited and infrequent public transportation and questions how the public transportation would be able to accommodate the needs of people without cars.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. As discussed in Section 4.16, *Transportation*, the project would not cause significant adverse impacts to fixed-route service. The project would not conflict with plans, policies, ordinances, or regulations pertaining to public transit. Ridership on area transit lines is not expected to exceed available capacities with the addition of demand associated with development facilitated by the project on Rezoning Sites.

Response 214.4

The commenter expresses concernregarding pedestrian and childrens' safety since most of Mirabel Road has ditches and no sidewalk.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Refer to Response 214.2 regarding pedestrian safety.

Response 214.5

The commenter expresses concernregarding local elementary schools and the lack of teachers and classrooms to accommodate the influx in children.

As analyzed in Section 4.15, *Public Services and Recreation,* students that would reside at the Rezoning Sites would attend various schools throughout the County. A generation rate of 6.64 age 5 to 10 children per an increase of 100 people based on US Census data was used in the Draft EIR to determine the number of school aged children that would likely attend schools within the county. This estimate is conservative in that it also assumes all school aged children would attend public schools. Based on the generation rate, the number of elementary schools, declining enrollment trends across school districts within the county, and payment of impact fees required from all projects, impacts to elementary schools would be less than significant. No revisions to the Draft EIR would be necessary in response to this comment.

Response 214.6

The commenter expresses concern regarding the closed high school and questions if there are plans to bus students to Sebastopol.

As analyzed in Section 4.15, *Public Services and Recreation,* students that would reside at the Rezoning Sites would attend various schools throughout the County. No development is proposed on any of the Rezoning Sites as part of this project, and decisions regarding school transportation would be made by the applicable school districts.

Response 214.7

The commenter states that the local sewer and water system would be required to be upgraded to accommodate the increase in residents.

This comment has been noted. Refer to Master Response UTIL.

Response 214.8

The commenter questions how the Forestville water district would accommodate 283 new homes.

Refer to Master Response UTIL. Stated in Section 4.18, *Public Utilities and Service Systems,* as part of the Draft EIR process, each water service provider was contacted and assessed in the Water and Sewer Study, included as Appendix WSS to the Draft EIR, for its ability to provide water service to the Rezoning Sites. The Forestville Water District did respond to the request for information on their ability to provide water and sewer service to the Rezoning Sites and stated that, apart from site FOR-4, there would be adequate water supply capacity to all other sites within Forestville. With the exception of Sites FOR-1 and FOR-2, there would be adequate existing wastewater collection systems and wastewater capacity. For sites FOR-1, FOR-2, and FOR-4, Mitigation Measure UTL-1 would apply, which would require additional assessment for water service and sewer capacity for the applicable Rezoning Site during the plan review and permit approval process. Therefore, development on Rezoning Sites within the Forestville Water District service area would be adequately served by the water and wastewater provider. No revisions to the Draft EIR are necessary in response to this comment.

Response 214.9

The commenter expresses concerns regarding police services and questions how extra policing would be ensured.

Police department services were analyzed within the Draft EIR in Section 4.15, *Public Services and Recreation.* It was determined that the police department would be able to maintain acceptable service ratio response times and would not require the construction of new or upgraded facilities due to the potential additional population of the Rezoning Sites.

Response 214.10

The commenter questions how access to medical and social services for future residents would be improved.

Please refer to Master Response EXST regarding existing conditions, including the existing availability or lack thereof of medical and social service providers. CEQA does not require projects to mitigate existing conditions or deficiencies, and pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes medica and social services.

Response 214.11

The commenter expresses the opinion that increasing the Forestville population by 1,625 residents is increasing the size of the town by 50 percent, which would substantially impact traffic, safety, and quality of life for current residents. The commenter expresses the opinion that current infrastructure is unavailable and lacking to accommodate the increase in population.

The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter. Please refer to Master Response TRA regarding traffic congestion. Please refer to Master Response EXST regarding existing conditions.

Response 214.12

The commenter expresses the opinion that Forestville should not be required to increase its population by 50 percent to satisfy Sonoma County's housing needs.

This comment has been noted. Refer to Response 214.11 and Master Response HE. The commenter's opinion is noted and will be passed on to County decision-makers.

EIR Public Comment 215

COMMENTER: Erin Jones

DATE: February 13, 2023

Response 215.1

The commenter expresses concernregarding the proposed 30 units on the Sweetwater Springs property off of Sunset Avenue (GUE-1).

This comment is noted. Responses to specific comments are below in Responses 215.2 through 215.9.

Response 215.2

The commenter states that the addition of 30 houses in the area would put a stress on the poor infrastructure. The commenter expresses the opinion that roads are narrow and the largest entrances, Woodland Drive and Palo Alto Drive, only permit one single car to pass. The commenter states that the increase in residents would add more traffic which would gridlock the area.

Please refer to Master Response EXST regarding existing roadway infrastructure and Master Response TRA regarding traffic congestion.

Response 215.3

The commenter states that there are no sidewalks for roads in the area and expresses concern regarding pedestrian safety.

Refer to Master Response EXST regarding the existing lack of sidewalks. Please refer to Section 4.16, *Transportation.* As discussed therein, development facilitated by the proposed project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access (page 4.16-14 of the Draft EIR). Additionally, as discussed under Impact TRA-2 (page 4.16-17 of the Draft EIR), development facilitated by the proposed project on Rezoning Sites would not substantially increase hazards due to sharp curves, dangerous intersections, or other design features.

Response 215.4

The commenter expresses the opinion that since Woodland Drive, Palo Alto Drive, and Morningside are the only access points to Flamingo Hill, it would be impossible to exist the area in the case of an emergency.

Please refer to Master Response EMG regarding emergency access and Master Response EXST regarding existing access points.

Response 215.5

The commenter states that the streets are located on steep hills and recommends widening the streets for safety purposes.

Please refer to Master Response EXST regarding existing infrastructure and Master Response EMG regarding emergency access.

Response 215.6

The commenter states that Woodland Drive, Palo Alto Drive, and Morningside are one lane roads and if River Road floods, then all the homes would be unable to evacuate the hill.

Please refer to Master Response EMG regarding emergency access and Master Response EXST regarding existing one lane in and one lane out roads.

Response 215.7

The commenter states that redwood trees cover a significant portion of the hill and they often fall on powerlines. The commenter states that last month's storm resulted in no power for 6 days.

Refer to Master Response EXST regarding existing conditions not caused by the proposed project. This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

Response 215.8

The commenter states that construction on the Sweetwater water supply site would displace the current water tank which actively supplies water. The commenter expresses her concern for water supply during a fire, and states that the current water capacity would be inadequate for the additional 30 homes.

No development is currently proposed on any of the Rezoning Sites. Refer to Master Response UTIL. Impacts related to water supply are analyzed in Section 4.18, *Utilities and Service Systems.* As discussed therein, development facilitated by the project on Rezoning Sites would require implementation of Mitigation Measure UTIL-1, Water and Wastewater Provider Capacity, to ensure adequate water supply for particular rezone sites. As discussed in Section 4.19, *Wildfire,* the Board of Forestry via California Code of Regulations Title 14 sets forth minimum development standards for emergency access, including but not limited to water supply (page 4.19-26 of the Draft EIR). Development facilitated by the project on Rezoning Sites would be required to comply with this development standard.

Response 215.9

The commenter expresses the opinion that electric and water utilities would be strained, and the propane network would require an expansion or upgrade in order to supply electricity and heat.

The commenter is likely referring to the natural gas distribution system. Impacts to electricity and natural gas service systems are discussed in Section 4.18, *Utilities and Service Systems.* As discussed therein, development facilitated by the project on Rezoning Sites would require connections to existing electrical and natural gas infrastructure, which would be provided in accordance with the rules and regulations of PG&E and approved by the California Public Utilities Commission. Impacts to electricity and natural gas would be less than significant.

EIR Public Comment 216

COMMENTER: Gillian Hayes

DATE: February 12, 2023

Response 216.1

The commenter states that they requested additional time but did not receive a response, and noted that the Notice of Availability did not list a 5pm deadline for receiving comments.

Page 2 of the NOA under "Public Comments" shows that the 5 p.m. deadline is stated. The Draft EIR was made available for public review for a 55-day comment period that began on December 28, 2022 and ended on February 23, 2023. *CEQA Guidelines* Section 15105(a) require EIRs to be circulated for at least 30 days and no longer than 60 days, except under unusual circumstances. Therefore, the Draft EIR was circulated for an appropriate amount of time, and no circumstances warrant a longer public review period.

Response 216.2

The commenter states that the Housing Element Update should develop housing within the Urban Growth Boundaries of the cities in Sonoma County and closer to urban areas and available services, and not 20 to 30 minutes outside of accessible services without transit and without necessary infrastructure.

The commenter does not specify which services they are referring to. As described in Master Response SITE regarding the site selection process, site criteria include being located within a designated Urban Service Area with public sewer and water service. Please also refer to Master Response EXST regarding existing conditions.

Response 216.3

The commenter quotes from Title 7, Division 1, Chapter 3, Sections 65580(e) and (f) of the Government Code and expresses the opinion that the DEIR does not adequately analyze economic, environmental, fiscal factors, and community goals listed in the Sonoma County General Plan, and the DEIR proposes to amend the General Plan without adequate analysis of required areas.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which economic and fiscal factors. However, it should be noted that to certify the EIR and approve the project, the County would adopt a Statement of Overriding Considerations pursuant to *CEQA Guidelines* Section 15093. This statement must explain the County's decision to approve the project that balances the project's economic, legal, social, technological or other benefits against its unavoidable environmental risks.

Response 216.4

The commenter expresses the opinion that the proposed project does not identify suitable sites and feasibility for development is deferred. The commenter states that Forestville and Guerneville lack infrastructure and services to accommodate more housing.

The commenter does not specify which infrastructure and services they are referring to. As described in Master Response SITE regarding the site selection process, site criteria include being located within a designated Urban Service Area with public sewer and water service.

Response 216.5

The commenter states that financial resources to make the project happen are not identified adequately as Government Code Section 65583 requires. The commenter states that population and employment trends and household characteristics are required under the code.

Government Code Section 65583 is specific to Housing Elements, and does not contain requirements for EIRs. Please refer to the Public Draft Housing Element for the requested information.

Response 216.6

The commenter states that ES-1 of the DEIR claims that all sites are adjacent to or within Urban Growth boundaries or cities in Sonoma County which is untrue. The commenter states that Forestville and Guerneville are not adjacent to UGB for any city and the nearest UGB would be Santa Rosas.

Page ES-1 states: "All Rezoning Sites near incorporated areas are within or adjacent to voter-approved Urban Growth Boundaries." This statement is referring only to Rezoning Sites that are near incorporated areas, and not all Rezoning Sites. Please refer to Figures 2-8, 2-12, and 2-13, where SAN sites are shown to be within the City of Santa Rosa UGB, PET sites are shown to be within the City of Petaluma UGB, and SON sites are shown to be within the City of Sonoma UGB. The statement on page ES-1 is correct and no revision is needed.

Response 216.7

The commenter expresses the opinion that ES-1 only discusses area plan amendments and does not describe the General Plan text amendments necessary to provide consistency throughout the General Plan.

The Housing Element includes Program 15k to adopt necessary General Plan amendments to provide consistency with the Housing Element.

Response 216.8

The commenter states that ES-2 of the DEIR claims that the project would implement General Plan policies and programs that require the County to identify urban sites near jobs and transit which may accommodate additional housing. The commenter expresses the opinion that Forestville and Guerneville do not have adequate jobs, transit, or schools as described in the DEIR Project Objectives.

Please refer to Master Response EXST regarding existing conditions, and Master Response SITE regarding the site selection process and criteria. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such,

formal analysis of economic or social impacts is not required, which includes jobs. The commenter's opinion is noted and passed on to decision-makers for consideration.

Response 216.9

The commenter states that rezoning of sites in Forestville and Guerneville would be inconsistent with General Plan policies since it would encourage sprawl and the loss of agricultural land and would be in direct conflict with Project Objectives.

Please refer to Impact LU-2, beginning on page 4.11-30 of the Draft EIR, regarding the project's consistency with General Plan policies. As stated therein, the project would not result in a significant environmental impact due to a conflict with a land use plan or policy.

Please refer to Impact AG-1, on page 4.2-15 of the Draft EIR, regarding the conversion of Important Farmland or conflicts with agricultural zoning. As stated therein, the project would not convert protected agricultural lands to non-agricultural use.

The commenter's opinion related to project objectives is noted and passed on to decision-makers for consideration.

Response 216.10

The commenter states that the DEIR does not adequately show there are available capacities for required services and jobs in the proposed locations. The commenter expresses the opinion that the project should not place disadvantaged populations, including low-income residents, in rural areas with a lack of services.

The commenter's opinion is noted and passed on to decision-makers for consideration. Please refer to Master Response SITE regarding the site selection process, and Master Response HE regarding opposition to the project. Please refer to Master Response EXST regarding existing conditions and infrastructure.

Response 216.11

The commenter comments on the loss of industrial zoned land on FOR-6 and expresses the opinion that replacements should be included since there is a deficit of industrial zoned land in Forestville.

The commenter's opinion is noted and passed on to decision-makers for consideration. FOR-6 is currently vacant and is not currently being used for industrial purposes.

Response 216.12

The commenter states there is Statewide Farmland of Importance on FOR-2 and the DEIR incorrectly includes a no impact determination.

CEQA defines Important Farmland as that which is characterized as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. FOR-2 is located on Farmland of Local Importance, which is not considered Important Farmland for the purposes of CEQA analysis. The impact conclusion provided in the Draft EIR remains accurate and no revisions are required.

Response 216.13

The commenter expresses the opinion that the proposed project would increase the population by 50 percent above the current population, which would produce detrimental impacts since there is a lack of proper infrastructure.

This comment has been noted. Please refer to Master Response EXST regarding existing services and infrastructure. The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter.

Please refer to Section 4.18, *Utilities and Service Systems*, regarding potential impacts to utility infrastructure that could result from the project.

Response 216.14

The commenter states that there is a lack of access to services in Forestville and Guerneville, and by placing housing away from the urban core, the proposed project would put pressure on communities that are not prepared for development.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 216.15

The commenter expresses the opinion that the DEIR does not adequately analyze biological impacts and mitigations defer for future study. The commenter states that the DEIR should conduct a study of the Natural Diversity database and the Santa Rosa Plain Conservation Strategy, and should include a high-level biologist review for all proposed rezone sites. Therefore, if any impacts were to occur, sites could be ruled out quickly. The commenter questions why a high-level analysis was prepared for geology and soils but not for biological resources.

Please refer to Section 4.4, *Biological Resources*, and Appendix BIO to the Draft EIR. The Rezoning Sites plus a 500-foot buffer were evaluated in these sections. As described therein, a query of the California Natural Diversity Database was used to inform the list of special-status species with the potential to occur. The Santa Rosa Plain Conservation Strategy is summarized on page 4.4-26 of the Draft EIR, and incorporated into the analysis and mitigation measures as appropriate. The commenter's assertion that a high-level review of biological resources was not done is incorrect.

Response 216.16

The commenter states that all proposed sites should be analyzed for utility service and capacity now instead of later. The commenter claims that all sites in Forestville would require off-site improvements and are not feasible for development, including related to existing pipe sizing. The commenter asserts that the DEIR's analysis is inadequate and asserts that engineered studies of the sewer system, stormwater system, and water system is necessary. The commenter asserts that water quality impacts require more attention and analysis. The commenter expresses the opinion that drainage patterns should not be assumed to be no impact.

Please refer to Section 4.18, *Utilities and Service Systems*, and Appendix WSS of the Draft EIR for an analysis of water and wastewater utility infrastructure. Stormwater, water quality, and drainage impacts are addressed in Section 4.10, *Hydrology and Water Quality*. Please refer to Impact HWQ-1, beginning on page 4.10-23 of the Draft EIR, regarding water quality impacts, which were determined to be less than significant. Please refer to Impact HWQ-3, beginning on page 4.10-26 of the Draft EIR, regarding stormwater runoff and drainage impacts, which were determined to be less than significant. Because no site-specific proposals for development on the Rezoning Sites are available at this time, a programmatic analysis was conducted.

Response 216.17

The commenter states that the intersection at Highway 116 and Mirabel Road is currently at LOS F, and VMT impacts are significant and unavoidable. The commenter expresses the opinion that the significant and unavoidable finding could be avoided if the sites were located closer to urban cores. The commenter states that this VMT impact is individual but also cumulative.

Please refer to Master Response TRA regarding LOS impacts, and Master Response SITE regarding site selection criteria. Please refer to Impact TRA-1, beginning on page 4.16-14 of the Draft EIR, regarding VMT impacts. Please also refer to Section 6, *Alternatives*, for alternatives considered that could reduce significant and unavoidable impacts. Within the reasonable range of alternatives, significant and unavoidable VMT impacts would still occur.

Response 216.18

The commenter states that the housing sites should be located in other areas due to the significant and unavoidable wildfire impacts.

Please refer to Master Response SITE regarding the site selection process and criteria. Please also refer to Section 6, *Alternatives*, for alternatives considered that could reduce significant and unavoidable impacts. Within the reasonable range of alternatives, significant and unavoidable wildfire impacts would still occur.

Response 216.19

The commenter states that the DEIR incorrectly determines a less than significant determination for public services and recreation. The commenter expresses the opinion that police and fire services are inadequate, and would not be able to accommodate a larger population since staffing capacity is currently 25 to 30 percent below.

Please refer to Master Response EXST regarding the existing conditions of public service facilities. As described under Impact PS-1, beginning on page 4.15-10 of the Draft EIR, impacts to fire protection facilities would be less than significant as future development would be required to comply with existing laws and regulations regarding fire safety, and the project would not substantially reduce existing response times or require the construction of new facilities. As described under Impact PS-2, beginning on page 4.15-12 of the Draft EIR, impacts to police facilities would be less than significant as the need for new officers would be distributed throughout the county, which would not require new police facilities, and General Plan Policy LU-4f requires the payment of developer fees for the provision of public services.

Response 216.20

The commenter expresses the opinion that broadband is not available in Forestville and Guerneville and the cost to add broadband to sites would be beyond what any of the development would be required to contribute. The commenter questions what the plan is for internet and cable access.

Please refer to Master Response EXST regarding existing conditions. As noted on page 4.18-15 of the Draft EIR:

> Project implementation requires connections to existing adjacent utility infrastructure to meet the needs of site residents and tenants. Based on the availability of existing telecommunications infrastructure, construction of new telephone and cable lines would not be required, and all sites would be able to connect to existing infrastructure. The project would be required to adhere to applicable laws and regulations related to the connection to existing telecommunication infrastructure. Therefore, there would be adequate telecommunications facilities to serve the future development on the Rezoning Sites and impacts related to telecommunications would be less than significant.

Response 216.21

The commenter states that the County requires 5 acres of parkland per 1,000 residents, and Forestville would require 10 more acres of parks if the sites are approved.

Potential impacts to park and recreation facilities, including the need for additional facilities, are discussed under Impact PS-4, beginning on page 4.15-15 of the Draft EIR. As described therein, the County requires payment of parks impact fees (per Sonoma County Code Section 20-65) and park dedication or in lieu fees (per Sonoma County Code Section 25-58,offsetting any impacts related to increased demand at existing recreation facilities. With payment of these fees, impacts would be less than significant.

Response 216.22

The commenter states that there is a lack of bus lines in Forestville and Guerneville, and only one bus serves the west county on Route 20. The commenter states that access to services is required by HCD and future development in Forestville and Guerneville would have a lack of access to transit.

Please refer to Master Response EXST regarding existing conditions and infrastructure. Please refer to Impact TRA-1, beginning on page 4.16-14 of the Draft EIR, regarding potential impacts to transit facilities. As noted therein, the Rezoning Sites are not within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor, and ridership on area transit lines is not expected to exceed available capacities with the addition of demand associated with development facilitated by the project on Rezoning Sites.

Response 216.23

The commenter states that curb, gutter, and sidewalks do not exist in Forestville and Guerneville or near any of the sites. The commenter expresses the opinion that investment in street and pedestrian infrastructure for all sites to transit and the downtown area would be beyond the legal nexus for the individual projects. The commenter questions how the installation of street infrastructure would be funded.

Please refer to Master Response EXST regarding existing conditions and infrastructure, including curb, gutter, and sidewalks. The Draft EIR is not required to mitigate existing conditions or deficiencies.

Existing transit access, bicycle conditions, and pedestrian facilities are described beginning on page 4.16-5 of the Draft EIR. Potential impacts to these facilities are described in Impact TRA-1, beginning on page 4.16-14 of the Draft EIR. As noted therein:

> …in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks.

The County collects countywide traffic development fees pursuant to Article 98 of Chapter 26 of the Sonoma County Code. The payment of these fees by each individual project would alleviate cumulative roadway deterioration impacts to the regional road network.

Response 216.24

The commenter states that several sites are located on scenic highways (including FOR-2) and would create significant and unavoidable impacts without mitigation.

Please refer to Impact AES-2, beginning on page 4.1-55 of the Draft EIR. As noted therein, several Rezoning Sites (although not FOR-2) are located close enough to a state-designated scenic highway that project implementation could cause a significant impact. This impact is identified as significant and unavoidable, with no feasible mitigation measures available. FOR-2 is located more than 1,000 feet from State Route 116, and is separated from the scenic highway by intervening development and vegetation.

Response 216.25

The commenter states the project will increase greenhouse gas impacts and recommends placing housing closer to UGBs to reduce VMT and GHG, and proposes the location near Fulton Road which is 10 to 15 minutes closer to services with more consistent transit.

Please refer to Master Response SITE regarding site selection criteria and Response 216.6 regarding UGBs. As noted therein, several Rezoning Sites are located within UGBs. Please also refer to Section 6, *Alternatives*, for alternatives considered that could reduce significant and unavoidable impacts. Within the reasonable range of alternatives, significant and unavoidable VMT impacts would still occur.

As discussed in Section 4.8, *Greenhouse Gas Emissions,* beginning on page 4.8-17, GHG emissions generated during project operation would result primarily from energy usage in buildings and fuel consumption associated with light-duty vehicles. Although the County of Sonoma does not have a qualified GHG-reduction plan, there are some proposed Housing Element policies that would assist in reducing emissions. Specifically, Policy HE-3e would reduce GHG emissions through the encouragement of infill development, ultimately reducing VMT. Policies HE-3g and HE-5d would focus development in areas well-served by existing transit, which would also reduce GHG emissions by reducing VMT. Similarly, Policy HE-6f focuses on the provision of high-quality public transportation. Policies HE-6a and HE-6b would promote the conservation of energy and energy efficiency in both new and existing development, which would reduce GHG emissions by reducing overall energy usage.

Response 216.26

The commenter states that the DEIR's analysis of school impacts is inadequate. The commenter expresses the opinion that the increase in density provides no tax revenue since only multi-family development is included under the project, which would result in less funding for students and less teachers. The commenter states that El Molino High School recently closed and 556 students were combined into Analy High School in Sebastopol, which is now at capacity for high school students.

Schools serving the Rezoning Sites are identified in Table 4.15-2 on page 4.15-3 of the Draft EIR. As noted therein, Forestville and Guerneville are served by Forestville Union Elementary, Guerneville Elementary, and West Sonoma County Union High. El Molino High School was not included in the analysis.

School impacts are addressed under Impact PS-3, beginning on page 4.15-13 of the Draft EIR. As stated therein, while development facilitated by the project on Rezoning Sites would increase the demand for school facilities, the payment of developer fees is considered adequate mitigation of school impacts. Therefore, impact to schools would be less than significant.

Response 216.27

The commenter states that the population growth estimates are incorrect since they are based on the countywide average per household, instead of the low-income increases or average of the county which is consistently higher than the countywide average growth.

The population estimates provided in the Draft EIR are based on the California Department of Finance (DOF) data, which provides persons per household data for incorporated cities, as well as unincorporated county areas. The County determined that the unincorporated Sonoma County persons per household estimate provided by the DOF was the appropriate data source for the population estimates in the EIR. The commenter does not provide an alternate source for population projections. No revisions to the EIR are required.

Response 216.28

The commenter states that Laughlin in Guerneville is an inappropriate site since it is located within a 100-year flood zone and regularly floods.

Please refer to Master Response SITE regarding site selection criteria, and Master Response HE regarding opposition to specific sites. Potential impacts related to flooding are addressed under Impact HWQ-4 on page 4.10-28. As noted therein, GUE-4 is located partially within a 100-year flood hazard area, but future development would be required to comply with General Plan policies, including zero net fill, avoiding fill in flood water retention areas, and review and approval of proposed drainage facilities. Impacts were determined to be less than significant with compliance with applicable regulations.

Response 216.29

The commenter states that FOR-1 requires more in depth hazards analysis.

The EIR identifies FOR-1 as containing the Electro Vector site in Table 4.9-2 of the EIR. Please refer to Impact HAZ-2, beginning on page 4.9-11 of the Draft EIR. As noted therein, development on FOR-1 would be preceded by investigation, remediation, and cleanup under the supervision of the RWQCB,

Sonoma County Local Oversight Program, or DTSC. The responsible agency would require the level of remediation required to reduce health risk to workers and future occupants. Compliance with existing State and local regulations would reduce impacts to less than significant.

Response 216.30

The commenter states that the Housing Element Update and DEIR are inconsistent with Policy HE-2a of the current Housing Element since there is no available infrastructure; Policy HE-3g since the proposed locations are not well served by public transit, schools and retail; and Policy HE-6g since the proposed project would increase GHG and would not provide public services.

Consistency with General Plan (including Housing Element) policies is addressed under Impact LU-2, beginning on page 4.11-30 of the Draft EIR. Policy HE-2a is addressed on page 4.11-38; as noted therein, the project is consistent with this policy by design. Please also refer to Master Response SITE regarding the site selection criteria. Please refer to Response 166.2 regarding consistency with Policies HE-3g and HE-6f.

Response 216.31

The commenter states that the Housing Element Update and DEIR are inconsistent with the General Plan Land Use Element, specifically Policy LU-15.3 since the proposed project would remove commercial centers which determines the character of the community; and Policy LU-15.4 since the proposed project would not maintain rural village through design of small scale development with substantial open space and native landscape. The commenter recommends sites to be located along Wright Road and Sebastopol Road instead of rural areas without adequate services for dense development. The commenter expresses the opinion that DEIR Alternative Option 3 for fewer rezone sites should be considered and Forestville sites FOR-1, FOR-2, and FOR-4 should be removed given the surrounding land uses and contamination on-site.

Consistency with General Plan policies is addressed under Impact LU-2, beginning on page 4.11-30 of the Draft EIR. As noted under Response 168.6, rezoning sites would not preclude existing commercial operations from continuing to operate, as under existing conditions.

The commenter does not specify which services they are referring to. As described in Master Response SITE regarding the site selection process, site criteria include being located within a designated Urban Service Area with public sewer and water service. Please also refer to Master Response EXST regarding existing conditions.

The commenter's preference for Alternative 3 is noted and passed on to decision-makers for consideration. FOR-1 and FOR-2 would not be rezoned under Alternative 3. FOR-4 was determined to have fewer constraints than the remaining sites which would not be rezoned under Alternative 3; therefore, it would continue to be rezoned under this alternative.

EIR Public Comment 217

COMMENTER: Greg Guerrazzi

DATE: February 13, 2023

Response 217.1

The commenter comments on two Glen Ellen Parcels (APN 054-290-057 and APN 054-290-084, items 65 and 66 in Housing Appendix Table) proposed for rezoning, and expresses the opinion that these sites are located outside of the urban growth boundary at an unsignalized intersection and therefore should not be upzoned.

Please refer to Response 70.12.

Response 217.2

The commenter requests the removal of the two Glen Ellen parcels due to significant impacts identified in the DEIR and the comment letter, and the consideration of an alternative zone district that reduces the number of allowed units on the site and does not require a minimum number of units.

The commenter is correct that the project would result in significant and unavoidable impacts to the environment. The Draft EIR is not required to reduce all potential impacts to a less than significant level but is required to discuss available and feasible mitigation measures that could reduce potential impacts. To that end, to certify the EIR and approve the project, the County would adopt a Statement of Overriding Considerations pursuant to *CEQA Guidelines* Section 15093. This statement must explain the County's decision to approve the project that balances the project's economic, legal, social, technological or other benefits against its unavoidable environmental risks.

Additionally, please refer to Section 6.4, *Alternatives Considered but Rejected*, for a discussion of alternatives that would rezone at a lower density and an explanation as to why they were ultimately rejected as feasible alternatives to the proposed project.

Response 217.3

The commenter states that Glen Ellen and Sonoma Valley are currently required to accommodate approximately 700 housing units as part of the SDC Specific Plan, and expresses the opinion that the area has taken on more than its fair share of housing and should not be required to accommodate more housing that would contribute to the significant traffic impacts identified in the SDC Specific Plan.

Please refer to Response 70.16.

Response 217.4

The commenter states that the proposed development would require the removal of several heritage trees.

Please refer to Section 4.4, *Biological Resources*, in the Draft EIR. As discussed therein, development facilitated by the proposed project on Rezoning Sites would be required to comply with the Sonoma County Tree Protection Ordinance, Article 67 of the Sonoma County Zoning Code: Valley Oak Habitat

Combining District, and the Sonoma County General Plan 2020 goals and policies. With adherence to these policies, impacts to biological resources such as trees would be less than significant.

Response 217.5

The commenter states that the property owner has not stated any intention to develop the property at the proposed density, which would not conform with the scale of the site and surrounding neighborhood.

This comment is noted and will be passed on to decision-makers. The rezoning is not dependent on stated intentions to develop a property. The purpose of the rezoning is to zone enough land to meet the RHNA for the unincorporated County.

Response 217.6

The commenter states that the development of the two sites would conflict with climate change policies since the area is not served by existing or planned transit, is not located near a job center, and is not located near or adjacent to an urban growth area.

Please refer to Section 4.8, *Greenhouse Gas Emissions*, in the Draft EIR. As discussed therein, the proposed project would be consistent with the 2017 Scoping Plan, Plan Bay Area 2040, the Sonoma County General Plan, and the County Climate Change Action Resolution. Overall impacts related to greenhouse gas emissions would be less than significant. Furthermore, as discussed in Section 4.16, *Transportation*, in the Draft EIR, VMT impacts would be less than significant. Please refer to Response 200.1 regarding the urban growth area.

Response 217.7

The commenter expresses the opinion that tripling the number of housing units on the site would add to the significant impacts caused by implementation of the SDC Specific Plan and that it is not consistent with the Glen Ellen Development Guidelines.

Please refer to Response 70.16 and Response 70.3.

Response 217.8

The commenter states that the proposed rezoning is inconsistent with General Plan policies regarding Glen Ellen and is also inconsistent with Glen Ellen Development Guidelines.

Please refer to Response 70.3.

Response 217.9

The commenter expresses the opinion that the two Glen Ellen parcels involves inappropriate and precedent-setting rezoning to a high-density zoning district, which is out of scale and would result in significant adverse impacts on Glen Ellen.

Please refer to Response 70.1 and Response 70.4.

Response 217.10

The commenter states that due to the Workforce Housing zone minimum development requirements, the two Glen Ellen parcels would have to be cleared of all vegetation, including large trees, which would significantly impact the community aesthetic character and conflict with Glen Ellen Development and Design Guidelines. The commenter expresses the opinion that the mass, scale, and building coverage required to meet the density requirements would not be flexible enough to be modified in such a way as to incorporate the siting and design features outlined in the mitigation measures. The commenter recommends consideration of an alternative lower-density residential zone.

Please refer to Response 70.3 regarding Glen Ellen Development and Design Guidelines and aesthetic impacts. Please refer to Section 6.4, *Alternatives Considered but Rejected*, for a discussion of why rezoning at a lower density is not a feasible alternative to the proposed project.

Response 217.11

The commenter expresses the opinion that the proposed rezoning of the two Glen Ellen parcels would conflict with Project Objective 6, which requires new housing in urban areas near jobs, transit, and services.

Please refer to Master Response SITE for an explanation of how sites were chosen for rezoning. Not all sites chosen would individually satisfy every project objective; however, as a group of rezoning sites, the project objectives would be met.

Response 217.12

The commenter states that traffic at the Arnold Drive and Carquinez Avenue intersection is incapable of supporting the dense housing proposed. The commenter expresses the opinion that the DEIR does not adequately address the impact on traffic, emergency evacuation, disturbance of existing residents, and the historic village of Glen Ellen.

Please refer to Master Response TRA and Master Response EMG regarding traffic and emergency evacuation. Please refer to Section 4.14, *Population and Housing*, in the Draft EIR regarding disturbance of existing residents. As stated therein, with implementation of Mitigation Measure PH-1, development that would displace individuals would be required to create a County-approved relocation plan. This would reduce impacts related to the disturbance of existing residents to less than significant. Regarding historic resources, please refer to Section 4.5, Cultural Resources, in the Draft EIR. As discussed therein, there are no known historical resources on any of the rezone sites, however impact could be significant due to the age of some of the structures on some sites. This impact would remain significant and unavoidable. The commenter is not specific about what disturbance to existing residents they are referring to, but refer to Section 4.3, *Air Quality*, and Section 4.13, *Noise*, for impacts of the project related to air quality and noise.

Response 217.13

The commenter states that evacuation traffic and emergency vehicle service and vehicle access would be substantially impacted due to the densification of the two parcels. The commenter states that the DEIR should consider and evaluate the cumulative impact of the development proposals, such as the SDC development, Elnoka Development on Highway 12 in east Santa Rosa, and Hanna development at Arnold Drive and Agua Caliente Road.

Please refer to Response 70.6.

Response 217.14

The commenter states that the two rezone parcels represent a large part of the downtown core, and the proposed development is inconsistent with the intent of the Glen Ellen policies in the General Plan and the Glen Ellen Development and Design Guidelines.

Please refer to Response 70.3.

Response 217.15

The commenter expresses the opinion that it is important to not overtax rural infrastructure and resources. The commenter states that tripling or quadrupling the number of housing sites on the two parcels would add to the significant impacts caused by implementation of the SDC Specific Plan.

Please refer to Response 70.6 regarding cumulative impacts related to SDC development. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes property taxes.

EIR Public Comment 218

COMMENTER: Harriet Katz

DATE: February 13, 2023

Response 218.1

The commenter states that constructing over 3,000 new low-income development in Forestville would result in negative impacts to traffic congestion, schooling, taxes in order to cover additional schools, and water usage. The commenter proposes the development of 500 to 600 units which would be more feasible given the existing infrastructure and resources. The commenter also states that the sites should be more evenly and fairly distributed throughout the county and in the incorporated areas as well.

The commenter is incorrect in assuming 3,000 new low-income developments are proposed. Rezoning is proposed on six sites in Forestville. Refer to Master Response TRA regarding traffic congestion.

Please refer to Section 4.15, *Public Services and Recreation*, for a full analysis of the proposed project's impact on schools. As stated under Impact PS-3 beginning on page 4.15-13, existing laws would require future project applicant(s) of any development facilitated by the project on Rezoning Sites to pay school impact fees at the time building permits are issued. These fees are used by Sonoma County School Districts to mitigate impacts associated with long-term operation and maintenance of school facilities. The applicant's fees would be determined at the time of the building permit issuance and would reflect the most current fee amount requested by the applicable district. The payment of school developer fees is considered adequate mitigation of schools impacts under CEQA. Therefore, impacts to schools are considered less than significant without mitigation.

Refer to Master Response UTIL regarding water usage.

The commenter's opposition to the project is noted and will be passed on to decision-makers.

EIR Public Comment 219

COMMENTER: Janice Stenger

DATE: February 13, 2023

Response 219.1

The commenter acknowledges that the Rezoning Sites are not timberland and comments on Impact AG-2 of the DEIR, and states that there are at least 25 to 30 large redwood trees in Guerneville that sequester carbon and provide shelter for animals. The commenter asks if redwood trees will be removed to facilitate sidewalks, and states that Impact AG-2 incorrectly assumes a no impact determination.

The comment regarding removal of redwood trees is noted. Please refer to Impact BIO-5 on page 4.4-39 of the Draft EIR. As stated therein, the project would be subject to the County's ordinances and requirements protecting biological resources such as trees and impacts would be less than significant.

Potential impacts to special-status species, including through habitat modification, are addressed under Impact BIO-1, beginning on page 4.4-28 of the Draft EIR. Please refer to Table 4.4-4, beginning on page 4.4-18 of the Draft EIR, for a list of special-status wildlife species with the potential to occur within the BSAs. As noted therein, the species mentioned by the commenter are not listed species. Impact BIO-1 includes mitigation measures for the reduction of potential impacts to special-status species, including preconstruction surveys for nesting birds and non-listed special-status species avoidance.

EIR Public Comment 220

COMMENTER: Janice Stenger

DATE: February 13, 2023

Response 220.1

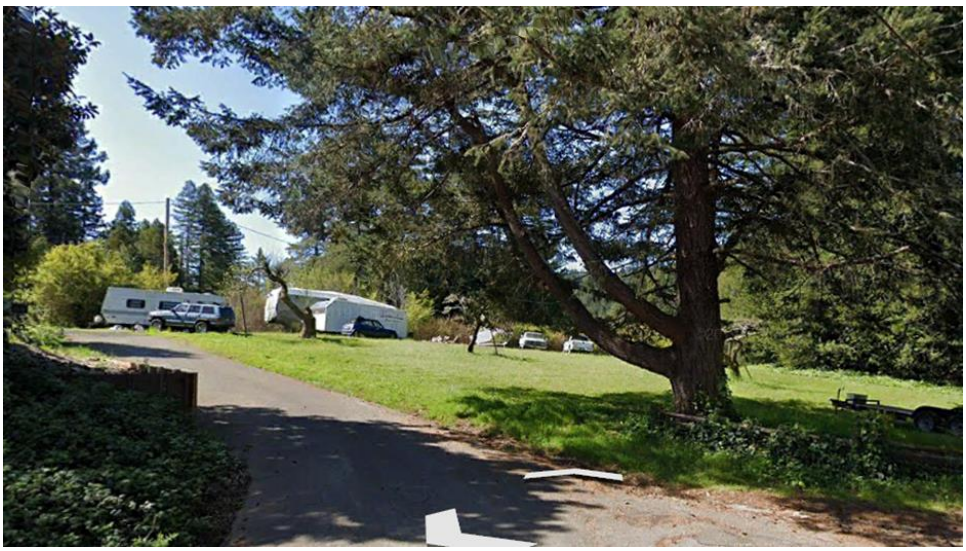
The commenter states no picture of their house or land appears in the DEIR, and the picture that is labeled for their house is actually a second picture of GUE-1. However, it is unclear which property the commenter is referring to.

It is unclear which property the commenter is referring to; however, we presume that the commenter resides on Site GUE-2. Figure 4.1-5 on page 4.1-12 of the Draft EIR, and the preceding text describing Figure 4.1-5 on page 4.1-11 of the Draft EIR, have been revised as follows:

GUE-2 and GUE-3 are on largely undeveloped lands among single-family residences bordered by agricultural lands and wooded hillsides (Figure 4.1-5a and Figure 4.1-5b).

Figure 4.1-5a GUE-2 Looking North from Laughlin Road

Figure 4.1-5b GUE-3 Looking Westward from Cutten Avenue



Source: Google Earth 2020

This revision does not modify the conclusions of the analysis in the Draft EIR, and no further revisions are required.

Response 220.2

The commenter quotes from the Aesthetics analysis in the DEIR and states the DEIR does not mention a particular house or cottage. However, it is not clear which site the buildings the commenter references are located on.

Please refer to Section 4.1, *Aesthetics*, in the Draft EIR. As discussed therein, the proposed project could have significant impacts related to scenic resources, however with implementation of mitigation measures AES-3 and AES-4 which would reduce impacts to be less than significant.

Response 220.3

The commenter questions if their house and barn would be torn down and if their redwood trees would be removed under the project.

The proposed project does not include any development, and any development would need to be proposed by the project applicant/developer. Development would not happen without the consent of property owner.

Response 220.4

The commenter states that their family and generations before them s have lived in Guerneville all their life.

This comment is noted. This comment does not pertain to the analysis in the Draft EIR.

Response 220.5

The commenter states that there is liquefaction in the Guerneville area and provides an explanation of expansive soils.

Please refer to page 4.7-3 of the Draft EIR which includes discussion of liquefaction risk on the Rezoning sites, including GUE-3 and GUE-4. Expansive soils occur throughout the County, as discussed on page 4.7-4. As discussed under Impact GEO-2 on page 4.7-25 of the Draft EIR, with adherence to applicable laws and regulations such as CBC requirements, impacts related to liquefaction would be less than significant. Similarly, as discussed under Impact GEO-4, with adherence to applicable laws and regulations such as CBC requirements, impacts related to expansive soils would be less than significant.

Response 220.6

The commenter provides commentary about farm animals on site and states that a setback from agriculture of 200 feet would block the view and would render parts of the property undevelopable.

The commenter is correct that agriculture buffers of 100-200 feet would be required including on sites GUE-2 and GUE-3, as described under Impact AG-3 in Section 4.2, *Agriculture and Forestry*. These buffers may alter visual resources on site and would reduce total developable area.

Response 220.7

The commenter comments on GUE-4 and states that the creek floods widely on the property. The commenter claims there was contamination that originated at the County Yard which shares a fence line with GUE-4 on the north side. The commenter expresses the opinion that spawning creeks should be protected.

Please refer to Figure 4.10-5 on page Section 4.10-11 of the Draft EIR, which shows GUE-4 is partially within the 100-year flood zone. As discussed under Impact HWQ-3 on page 4.10-25, development facilitated by the proposed project on Rezoning Sites would not result in increased flooding on or off site. Additionally, as discussed under Impact HWQ-4, development on sites within a flood hazard zone would be required to comply with the Sonoma County General Plan and Sonoma County Code. Overall, impacts related to flooding would be less than significant. Table 4.9-2 details open hazardous materials cases in the vicinity of the Rezoning Sites; none are noted near the Guerneville area. The Guerneville Road Yard leaking underground storage tank case has been closed since 2005, according to information in the State Resources Control Board's GeoTracker website. The rest of the comment is noted and will be passed on to decision-makers.

EIR Public Comment 221

COMMENTER: Jared McConnell

DATE: February 13, 2023

Response 221.1

The commenter expresses disapproval of the proposed units in Forestville since there is a lack of infrastructure.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 221.2

The commenter states that future low-income residents would likely be looking for jobs which are already very few in Forestville. The commenter also expresses the opinion that necessities are expensive since there is only one grocery store in town.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes the cost of groceries. Additionally, refer to Master Response EXST regarding the existing conditions of the area not caused by the project.

Response 221.3

The commenter states that Forestville does not have a good bus schedule for residents to travel to larger cities where they might work.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Additionally, please refer to Section 4.16, *Transportation*, which includes discussion of impacts to the transit system starting on page 4.16-14. As stated therein, the project would not result in adverse impacts to fixed-route service. Furthermore, development facilitated by the project on Rezoning Sites would not conflict with plans, policies, ordinances, or regulations pertaining to public transit, and increased ridership is not expected to exceed available transit capacities.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 221.4

The commenter expresses the opinion that since El Molino High School has closed down, students would be required to be bused to Sebastopol which would cost taxpayers more money.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes the cost to taxpayers.

Response 221.5

The commenter states that the road in and out of Forestville sometimes floods in the winter. The commenter expresses the opinion that the town's population should not be doubled.

This comment has been noted. Refer to Master Response EXST regarding the existing flooding risk. Please refer to Section 4.10, *Hydrology and Water Quality,* of the Draft EIR for detail pertaining to impacts of flooding induced by the proposed project. Refer to Figure 4.10-4, which shows that none of the Forestville Rezoning Sites are within Flood Hazard Zones. Furthermore, as stated in Impact HWQ-3 on page 4.10-26, the proposed project would alter drainage patterns and increase runoff at the Rezoning Sites, but would not result in increased flooding on or offsite, or exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts regarding flooding would be less than significant.

The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter. Note that rezoning does not guarantee that development would occur, and the decision to rezone specific parcels is up to decision-makers.

Response 221.6

The commenter raises concerns regarding the increase in population and the resulting crime and effect on his home value. The commenter asks if theywould be able to build an ADU or two on their property.

Crime rates and home values are not related to the analysis in the Draft EIR. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes the future value of nearby residences. Please refer to Section 4.15, *Public Services and Recreation*, regarding potential impacts to police services (Impact PS-2) As noted therein, impacts would be less than significant.

The commenter's question regarding ADU development is not relevant to the proposed project or environmental impact analysis.

EIR Public Comment 222

COMMENTER: Jaye Deane Griffiths

DATE: February 13, 2023

Response 222.1

The commenter provides input on the property at 16050 Laughlin Road (GUE-4), which is located directly adjacent to their property. The commenter states that the rezoning would affect the safety of children walking to the elementary school, since Laughlin Road is not a pedestrian friendly road, and additional development would increase traffic. The commenter states that the property has a limited entrance and a lack of infrastructure.

Refer to Master Response EXST regarding existing pedestrian safety conditions. This is an existing condition of the area and not caused by the proposed project. Future development facilitated by the project on Rezoning Sites would need to confirm that adjacent roads meet County requirements.

Please refer to Master Response TRA regarding traffic impacts. Regarding pedestrian facilities, please refer to Impact TRA-2 in Section 4.16, *Transportation,* of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

Response 222.2

The commenter questions whether the school would be able to accommodate an increase in children, and expresses her disapproval of rezoning the parcel at 16050 Laughlin Road (GUE-4).

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Impacts to schools are analyzed in Section 4.15, *Public Services and Recreation*, under Impact PS-3. As stated therein, "development facilitated by the project on Rezoning Sites would generate approximately 1,145 school-aged children across 11 school districts in the County." Based on the projected decline in enrollment across school districts serving the Rezoning Sites and the estimated 1,145 new school-aged children that would result from development associated with rezoning under implementation of the project, most of the school districts would be able to absorb new and incoming students because the increases in the student population are not greater than the anticipated decreases in enrollment (with the exception of Forestville Elementary and Geyserville Unified School Districts). Applicants would pay school impact fees at the time building permits are issued, to be used by Sonoma County School Districts to mitigate impacts with long-term maintenance and operation of school facilities. This impact would be less than significant, as stated in the EIR.

Response 222.3

The commenter states that flooding on Armstrong Woods Road due to the overflow of Fife Creek is an ongoing problem. The commenter states that the property shares a several acre boundary with Fife Creek, and questions what impacts would there be in disturbing the boundary and how pervious surface run-off would affect the flow. The commenter expresses concerns regarding evacuation since the only other way to evacuate is a windy and narrow road often limited to one way traffic.

Refer to Master Response EXST regarding existing road conditions. As stated in Impact HWQ-3 on page 4.10-26, the proposed project would alter drainage patters and increase runoff at the Rezoning Sites, but would not result in increased flooding on or offsite, or exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts regarding flooding would be less than significant.

Please see Master Response EMG regarding emergency evacuation.

Response 222.4

The commenter expresses concern that evacuations might impact groundwater flow, levels, and quality since the local water table is shallow. The commenter questions if the Department of Fish and Wildlife has been notified about development along the border of Fife Creek.

The Notice of Completion & Environmental Document Transmittal filed with the State Clearinghouse at the beginning of the comment period including Region 3 of the CDFW in the reviewing agencies checklist.

The connection between evacuations and groundwater flow levels, quality, and contamination is not clear from this comment, nor is whether the commenter is referring to existing evacuations or future evacuations that may involve developments on the Rezoning Sites. However, hydrology and water quality are discussed in Section 4.10 of the Draft EIR. Groundwater recharge from the addition of impervious surfaces is addressed under Impact HWQ-2, beginning on page 4.10-25 of the Draft EIR. As stated therein, the County requires compliance with the LID Manual, which requires implementation of permanent operational stormwater BMPs, including stormwater capture basins. Impacts were determined to be less than significant.

In response to concerns about project placement near riparian zones and stream habitat, pursuant to Mitigation Measure BIO-15 in the Draft EIR, areas identified by the project-specific biological assessment (Mitigation Measure BIO-1) as containing potentially jurisdictional features must contract a qualified biologist to complete a jurisdictional delineation. This delineation would determine the extent of jurisdiction for California Department of Fish and Wildlife (CDFW), USACE, and/or RWQCB, and result in avoidance of these areas to the maximum extent possible.

Response 222.5

The commenter questions whether the proposed development would affect the Historical Route.

The commenter does not specify which Historic Route or potential impacts of concern they are referring to; however, see Impact AES-2 in the Draft EIR regarding aesthetic impacts to scenic highways including State Route 116. As stated therein, development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, and thus projects on ten of the rezoning sites (including site GUE-1) may remove or damage scenic resources within a State-designated highway, particularly by changing the character of visual resources.

Refer to Section 4.15, *Noise*, for noise related impacts near State Route 116 and Section 4.16, *Transportation*, for traffic related impacts near State Route 116.

Response 222.6

The commenter questions if the additional traffic affecting the State and National forest was analyzed.

Please see Master Response TRA regarding traffic impacts.

Response 222.7

The commenter expresses concerns regarding pressure on the already stressed local fire stations as well as traffic.

Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. As discussed under Impact PS-1 starting on page 4.15-10, local fire districts are all meeting the National Fire Protection Association response time goals for rural and suburban areas. The Rezoning Sites themselves are all within 1.5 miles of the nearest fire station, and emergencies on these sites would be responded to within the response time goals. In addition, if the County requires the expansion of fire department facilities, General Plan Policy PS-3m requires the consideration of payment of impact fees to ensure fire departments are adequately funded to serve new projects, and Sonoma Valley Fire District and Sonoma County Fire District adopted impact fees in 2021 that are collected for the purpose of mitigating impacts caused by new development on each district's infrastructure. Fees are used to finance the acquisition, construction and improvement of public facilities needed as a result of this new development. Therefore, impacts regarding fire service response times and facilities were determined to be less than significant.

Response 222.8

The commenter raises concerns regarding parking on streets that have no sidewalks, and mentions children safety walking and bicycling on these streets.

Parking is not considered an environmental impact and is not a required topic under CEQA.

Please refer to response 222.1 regarding existing road conditions and pedestrian safety.

EIR Public Comment 223

COMMENTER: Jim Smith

DATE: February 13, 2023

Response 223.1

The commenter expresses the opinion that although affordable housing is needed in Forestville, Forestville is taking way more than their fair share of new housing units within Sonoma County.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 223.2

The commenter questions whether current utilities (water, sewer, power, roads etc.) would be able to support the additional units without major upgrades.

This comment has been noted. Please refer to Master Response UTIL regarding utility availability. Refer to Section 4.18, *Utilities and Services Systems*, for analysis of water, wastewater, and electric power. Refer to Section 4.16, *Transportation*, regarding roadways. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 223.3

The commenter questions whether increased vehicle and foot traffic has been analyzed.

Please refer to Master Response TRA regarding vehicle traffic impacts. Regarding pedestrian traffic, please refer to Impact TRA-2 in Section 4.16, *Transportation,* of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

Response 223.4

The commenter questions what the cost is to purchase a low- or moderate-income home.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes the cost of purchasing a home.

Response 223.5

The commenter questions where the pedestrian crosswalk lights for Highway 116 are in downtown.

Refer to Master Response EXST regarding existing pedestrian safety conditions. This comment has been forwarded to the County.

Response 223.6

The commenter questions why the old Crinella property at Highway 116 and Mirabel Road not included in the project.

This comment has been noted and passed on to decision-makers. Please see Master Response SITE regarding the site selection process.

Response 223.7

The commenter expresses the opinion that site FOR-1 would be the best location for new housing, and a toxic cleanup may qualify for federal or State funding in order to benefit the community.

This comment has been noted. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes potential funding opportunities for the community.

Please see Section 4.9, *Hazards and Hazardous Materials*, regarding site-related hazard remediation. Sites with hazardous materials near the Rezoning Sites (including site FOR-1) are listed in Table 4.9-2. Development typically within 0.25 mile of sites identified in Table 4.9-2 would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board, the Sonoma County Local Oversight Program, or DTSC, before construction activities could begin. Compliance with existing State and local regulations regarding onsite hazards would reduce impacts to less than significant. Refer to Response O-2.3 regarding the Electro Vector site specifically.

Response 223.8

The commenter expresses the opinion that sites FOR-3, 5, and 6 would be good locations for new housing if the land is not needed for the Forestville Sewer Plant pond expansion.

This comment has been noted and will be passed on to decision-makers.

Response 223.9

The commenter expresses the opinion that site FOR-7 would be a good stand alone property for the project and that FOR-2 would require infrastructure updated and create traffic.

Please note that FOR-7 is not a Rezoning Site, but based on its existing zoning was included in the proposed Housing Element Site Inventory. However, this comment has been noted and will be passed on to decision-makers. Please see Master Response TRA regarding traffic impacts.

Response 223.10

The commenter expresses the opinion that site FOR-4 would be feasible if it is the parcel shown on the DEIR map and not the location at the end of the road. The commenter recommends combining FOR-4 with FOR-1 with an entrance on Covey Road.

This comment has been noted and will be passed on to decision-makers.

EIR Public Comment 224

COMMENTER: John Kiriakopolos

DATE: February 13, 2023

Response 224.1

The commenter states that the proposed housing in Forestville is out of scope, and there is a lack of infrastructure (roads, sewer, utilities) to accommodate the proposed development. The commenter provides examples and states site FOR-4 is a narrow two-lane road leading to a single private driveway, and site FOR-2 is a quiet residential area with mainly one-story homes.

Please refer to Master Response HE regarding opposition to the Housing Element. Refer to Master Response UTIL regarding sewer and utilities infrastructure. Please refer to Master Response EXST regarding existing conditions of services and infrastructure. The EIR acknowledges that access roads in the vicinity of FOR-2 may be narrow on page 4.19-26 of the EIR.

EIR Public Comment 225

COMMENTER: Josh Beniston

DATE: February 13, 2023

Response 225.1

The commenter expresses concerns regarding the proposed changes to parcels in the Forestville area, and states that the percentage of housing units proposed for Forestville should be reduced and the units should be shifted to areas with better capacity such as areas around Sonoma County airport, Larkfield, and unincorporated Petaluma. The commenter expresses the opinion that Forestville lacks sidewalks, traffic lights and other road safety measures, and has minimal access to public transit to other areas.

Refer to Master Response SITE regarding site selection, and Master Response HE regarding opposition to the Housing Element. The commenter's opinion will be forwarded to County decision-makers.

Response 225.2

The commenter expresses concerns regarding safety and congestion issues resulting from the increase in housing related to additional cars and traffic. The commenter expresses the opinion that the road corridors impacted in the proposed plans would be required to be upgraded.

Refer to Master Response TRA regarding traffic congestion issues. Traffic safety impacts associated with the proposed project are addressed under Impact TRA-2, on page 4.16-18 of the Draft EIR. Need for traffic infrastructure improvements would be ascertained on a project-by-project basis when individual developments are proposed.

Response 225.3

The commenter expresses support to adding higher density housing in some areas of Forestville, specifically Packing House Road and the Electro Vector Site. The commenter states that the Electro Vectro site is currently a public health risk and should be properly remediated and utilized for development.

Refer to Master Response SITE regarding site selection. The EIR identifies FOR-1 as containing the Electro Vector site in Table 4.9-2 of the EIR. Refer to Impact HAZ-2 regarding investigation, remediation, and cleanup before development. As discussed therein, compliance with all applicable regulations relating to site remediation would minimize impacts to development at Rezoning Site FOR-1 to a less than significant level.

Response 225.4

The commenter expresses concerns regarding the addition of 71 units on the FOR-4 site and states that the number of units proposed is far too high given the lack of infrastructure for walking and driving, and character of the area.

Refer to Master Response EXST regarding the existing lack of roadway infrastructure. Refer to Master Response HE regarding opposition to the project. The commenter's opinion is noted and will be passed onto decision-makers.

EIR Public Comment 226

COMMENTER: Judith Weller

DATE: February 13, 2023

Response 226.1

The commenter states that although they understands that there is a need for affordable housing in Forestville, they are opposed to the project due to emergency evacuations. The commenter states that during the last two fire evacuations, all evacuation routes were extremely congested.

Please refer to Master Response EXST for a discussion on existing conditions within the county and refer to Master Response EMG for a discussion on emergency access within the county.

Response 226.2

The commenter expresses concerns regarding public services and parking, and states that most local streets are packed with illegally parked vehicles, which becomes worse during summer vacation months with tourists. The commenter states that many visitors use bushes along the river and small neighborhood streets as toilets and leave large amounts of garbage.

Section 4.15, P*ublic Services and Recreation,* of the Draft EIR analyzes the project's potential impacts to public services within the county and in each of the areas identified for Rezoning Sites. Note that parking is not a discussion topic required to be evaluated under CEQA.

Response 226.3

The commenter states that there is only one fire station in Forestville, and sheriffs currently are understaffed and cannot respond to many of the calls they receive.

This comment is noted. Please refer to Master Response EXST for a discussion on existing conditions within the county and surrounding areas.

Response 226.4

The commenter states that there is only one grocery store for current residents and is not within walking distance of the town.

This comment is noted. Please refer to Master Response EXST for a discussion on existing conditions within the county and surrounding areas.

Response 226.5

The commenter states that there is no clinic or doctor's office in the area.

This comment is noted. Please refer to Master Response EXST for a discussion on existing conditions within the county and surrounding areas.

Response 226.6

The commenter asks to scale the project down and not to put pressure on the Forestville community.

This comment is noted and will be passed on to decision-makers for their consideration.

EIR Public Comment 227

COMMENTER: K Brooks

DATE: February 13, 2023

Response 227.1

The commenter states that the rezoning of parcels GRA-3 and GRA-5 should be reconsidered and not pursued due to significant and unavoidable impacts, which would negatively impact the area and quality of life of residents.

Please refer to Master Response HE regarding opposition to the Housing Element. The commenter does not refer to a specific impact identified in the Draft EIR.

Response 227.2

The commenter expresses the opinion that them and their neighbors would not want their property values to decrease and enjoy the semi-secluded character of the current neighborhood.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes property values.

Response 227.3

The commenter states that parcels GRA-3 and GRA-5 are two of the few parcels on the Sonoma County proposed map that have significant and unavoidable impacts, and that the County should focus on developing sites that do not have such grave impacts on the community and infrastructure.

This comment is noted and has been passed on to County decision-makers.

Response 227.4

The commenter comments on Impact AES-2, and states that the addition of 100 to 300 people under GRA-3 and GRA-5 would disrupt the scenic qualities of Highway 116 and impede on the scenic route plan.

The commenter is correct. As discussed in Section 4.1, *Aesthetics,* of the Draft EIR, potential impacts to scenic highways would be significant and unavoidable for sites including GRA-3 and GRA-5, as development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, and thus projects on ten of the Rezoning Sites may remove or damage scenic resources within a State-designated highway, particularly by changing the character of visual resources.

Response 227.5

The commenter comments on Impact AES-2, and states that the three winery tasting rooms along Highway 116 would be affected since most visitors pay to enjoy the scenic environment.

Pursuant to *CEQA Guidelines* Section 15131, economic effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic impacts is not required, which includes wineries and businesses near the project area.

Response 227.6

The commenter provides comments on Impact AES-1 and states that most mature trees would need to be removed for the development of sites GRA-3 and GRA-5, which would decrease the privacy and shade available to existing properties.

The commenter is correct that the potential aesthetic impacts to GRA-3 and GRA-5 are significant and unavoidable. Potential impacts to existing visual character and existing public views are discussed under Impact AES-3 in Section 4.1, *Aesthetics.* As discussed therein, trees may be removed and even with Mitigation Measure AES-1 for screening vegetation, the project may substantially degrade the existing visual character or quality of public views of GRA-3 and GRA-5 and their surroundings.

Response 227.7

The commenter expresses the opinion that the development of sites GRA-3 and GRA-5 would create a significant increase in daily noise, trash, and people. The commenter states that the increase in people and cars would severely impact traffic since the intersection is not constructed to handle large amounts of traffic. The commenter also expresses his concern regarding congestion during emergency situations and the safety of current residents.

Please refer to Master Response EXST regarding existing conditions and infrastructure; Master Response TRA regarding traffic impacts; and Master Response EMG regarding emergency access and evacuation.

Response 227.8

The commenter expresses his concern regarding safe traffic since there are currently no sidewalks or proper traffic accommodations.

Refer to Master Response EXST regarding the existing lack of sidewalks. Please refer to Master Response TRA regarding traffic impacts. Refer to Response 96.3 regarding pedestrian infrastructure.

Response 227.9

The commenter states that all neighboring homes surrounding sites GRA-3 and GRA-5 receive water from wells. The commenter expresses concern regarding the depletion of water supply with the increased population, and questions whether the units would be connected to public utilities.

Please refer to Master Response UTIL regarding existing utility systems. Impacts to utilities are discussed in Section 4.18, *Utilities and Service Systems,* of the Draft EIR.

Response 227.10

The commenter states that the Graton sewer is unable to accommodate the large increase in population, and questions how the proposed projects would receive sewer services. The commenter requests confirmation that the proposed developments would be connected to public utilities and septic would not be permitted.

The proposed project would not involve construction of specific housing developments or the installation of specific utility connections at this time but rather the proposed project considers the potential rezoning of properties that could accommodate housing in the future in order to meet the RHNA requirements in accordance with State housing law. Please refer to Master Response UTIL

regarding existing utility systems. Impacts to utilities are discussed in Section 4.18, *Utilities and Service Systems,* of the Draft EIR.

Response 227.11

The commenter expresses concerns regarding safety and crime since site GRA-5 would share a fence line with existing homes.

As discussed in Section 4.15, *Public Services and Recreation,* development facilitated by the project on Rezoning Sites would not result in adverse physical impacts with the construction of new or physically altered police facilities to maintain acceptable service ratio response times or other objectives.

Response 227.12

The commenter states that sites GRA-3 and GRA-5 have Sebastopol addresses and are situated in unincorporated Sebastopol, and questions why they have been classified as Graton for the Housing Element Update.

As shown in Figure 2-7 in Section 2, *Project Description,* Rezoning Sites GRA-3 and GRA-5 are within the Urban Service Area of Graton.

Response 227.13

The commenter states that them and their neighbors would like to know what the proposed building plans are. The commenter states that from the developer's website, the houses are movable units with utility hook up capability, and the Guerneville site would use septic and possible sex offenders would be living on the sites. The commenter expresses his disapproval of this type of community to be placed on sites GRA-3 and GRA-5.

The proposed project would not involve construction of specific housing development. This comment does not pertain to the adequacy of analysis within the Draft EIR.

Response 227.14

The commenter recommends the County to consider purchasing 1853 Cooper Road or 7919 Occidental Road in Sebastopol to accommodate the proposed projects, since more infrastructure would be available. The commenter also recommends allowing single-family residential homes on sites GRA-3 and GRA-5, which would add to the housing stock while keeping the historical rural look of the highway design.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers. Additionally, the EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, Sebastopol and Windsor, have their own ABAG-assigned RHNA and housing elements. For additional information regarding impacts to schools and law enforcement, please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR.

Response 227.15

The commenter requests that the County install taller fencing and landscaping around properties adjacent to site GRA-5 and that the County does not allow mobile homes within sites GRA-3 and GRA-5. The commenter also requests that the County ensures that water and sewer services be provided to sites GRA-3 and GRA-5, and that the County does not allow common bathhouses or showers.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

Response 227.16

The commenter requests that the County rejects development proposals that would result in destruction of beauty in the area, overcrowding, and a reduced quality of life for existing residents.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

EIR Public Comment 228

COMMENTER: Kat Deaner

DATE: February 13, 2023

Response 228.1

The commenter expresses her opposition to the rezoning of site FOR-4 in Forestville, and states that the proposed increase of 1,650 residents (50 percent increase) in Forestville is negligent. The commenter states that Forestville does not have sidewalks and bike lines, and site FOR-4 is located in an area that could not handle an increase of 185 new residents. The commenter states that a housing complex with 71 units does not fit in the neighborhood.

This comment has been noted. Please refer to Master Response EXST regarding existing services and infrastructure. The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter. Note that rezoning does not guarantee that development would occur. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 228.2

The commenter expresses her desire to see a community-driven plan with growth that is compatible with the culture and feel of the existing town. The commenter states that services must be available for an increase in population.

This comment does not pertain to adequacy of analysis within the Draft EIR. Impacts to public services are evaluated in Section 4.15, *Public Services and Recreation.* As discussed therein, development facilitated by the proposed project on Rezoning Sites would not result in substantial adverse physical impacts associated with the construction of new or physically altered public facilities.

Response 228.3

The commenter expresses the opinion that sites FOR-1, FOR-3, FOR-5, and FOR-6 are more suitable for high-density development as they are located along Highway 116, and that site FOR-1 is suitable for development.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment is noted and has been passed on to County decision-makers.

EIR Public Comment 229

COMMENTER: Kon Zaharoff

DATE: February 13, 2023

Response 229.1

The commenter attaches Letter 77 and mentioned they tried to drop off the letters on February 13, and the comment period should not end on a County holiday.

Refer to Responses 77.1 through 77.6 regarding individual concerns in Letter 77. As described in Section 1, *Introduction*, the comment period ended on February 23 rather than February 13.

EIR Public Comment 230

COMMENTER: Leslie Markham

DATE: February 13, 2023

Response 230.1

The commenter expresses concerns related to FOR-2, including those related to wildfire danger, climate change, lack of water and sewer, egress and ingress, traffic, and lack of local amenities.

This comment is noted. The commenter's specific concerns are addressed in Response 230.2 through 230.28, below.

Response 230.2

The commenter expresses a preference for Alternative 3, based on identified potential significant effects, environmental constraints, and unknowns related to FOR-2. The commenter asserts that no alternative locations were considered, and indicates that the EIR identifies Alternative 3 as the environmentally superior alternative.

The commenter's preference is noted and is passed on to decision-makers for consideration.

Because the proposed project is the Housing Element Update for Sonoma County, an 'alternative location' alternative is not possible. Alternative sites were considered for rezoning; please refer to Master Response SITE regarding the site selection process.

Response 230.3

The commenter asserts that there are other sites not considered in the EIR that would have a lesser impact, require less costly infrastructure improvements, and reduce wildfire and other significant impacts. The commenter states that the County must fulfill the state mandate and also identify the environmental impacts of the chosen sites to identify housing that would not result in significant environmental damage.

The commenter does not provide specific additional sites for consideration. Please refer to Master Response SITE regarding the site selection process. The potential environmental impacts of the selected sites are addressed throughout the Draft EIR.

Response 230.4

The commenter asserts that an alternative location must be considered in an EIR, pursuant to CEQA Guidelines Section 15126.6. The commenter asks how sites were chosen, and if they are the least impactive sites.

Please refer to Master Response SITE regarding the site selection process. Because the proposed project is the Housing Element Update for Sonoma County, an 'alternative location' alternative is not possible. Additionally, alternative Rezoning Sites were considered as part of Alternative 3.

Response 230.5

The commenter states that the landowner of FOR-2 has indicated that they will not be selling their land and intend to continue agricultural use of the land. The commenter asserts that the 238-unit estimate for FOR-2 is not realistic.

The proposed project would update the County's Housing Element and would rezone a number of sites, including FOR-2. However, this action does not require development to occur on any of the Rezoning Sites, it merely allows for future development of the Rezoning Sites at a higher density. Please refer to Master Response SITE regarding the site selection process, and Master Response HE regarding dissatisfaction with the selected sites.

Response 230.6

The commenter states that there may be other sites in the County that would not result in significant adverse impacts.

This comment is noted. Please refer to Master Response SITE regarding the site selection process.

Response 230.7

The commenter provides an excerpt from CEQA Guidelines Section 15126.6, with certain sentences bolded and underlined. The commenter asserts than an alternative location should have been considered in the Draft EIR.

Please refer to Master Response SITE regarding the site selection process. Because the proposed project is the Housing Element Update for Sonoma County, an 'alternative location' alternative is not possible.

Additionally, pursuant to *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 993: there is no rule requiring an EIR to explore off-site project alternatives in every case. As stated in *CEQA Guidelines* Section 15126.6(a) (emphasis added): "An EIR shall describe a range of reasonable alternatives to the project, *or to the location of the project,* which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." As this implies, "an agency may evaluate on-site alternatives, off-site alternatives, or both" (*Mira Mar, supra,* 119 Cal.App.4th at p. 491, 14 Cal.Rptr.3d 308). The *CEQA Guidelines* thus do not require analysis of off-site alternatives in every case. Nor does any statutory provision in CEQA "expressly require a discussion of alternative project locations" (*Ibid.,* citing Public Resource Code Sections 21001[g]), 21002.1[a], and 21061). No revisions are required to the Draft EIR.

Response 230.8

The commenter states that FOR-2 is within an Urban Service Area, in an unincorporated area, and far from amenities.

This comment is noted. Please refer to Master Response SITE regarding the site selection process, including the criteria for selecting sites within the unincorporated county.

Response 230.9

The commenter states that the project would result in 783 new people residing on FOR-2, and 1,652 people in all of Forestville. The commenter states that this would be a sharp population increase from the existing population of 3,800 people in 2020. The commenter indicates this would increase greenhouse gas emissions, and would impact the community itself.

As shown in Table 2-4 beginning on page 2-25 of the Draft EIR, the project would result in a total population of 736 people on FOR-2, 718 people greater than under the site's existing designation. The population increase resulting from the project on Forestville sites would be 1,484 greater than under existing designations.

Impact PH-1, beginning on page 4.14-6 of the Draft EIR, addresses potential impacts related to unplanned population growth. As described therein, this impact would be less than significant.

Greenhouse gas (GHG) emission impacts are addressed under Impact GHG-1, beginning on page 4.8-17 of the Draft EIR. As stated therein, the project would increase GHG emissions, and Mitigation Measure GHG-1 would be required; however, impacts would remain significant and unavoidable.

Response 230.10

The commenter asks if this population increase would increase the demand on public services, specifically Sheriff's Office staffing.

Impacts PS-1 through PS-5, beginning on page 4.15-10 of the Draft EIR, address potential impacts related to increased demands for public services and recreation facilities, with Impact PS-2 focused on impacts to police facilities. As described therein, the increase in demand for police services would be spread throughout the county, with no more than three new officers required at any one station. General Plan Policy LU-4f requires the payment of fair share fees during the building permit process, which fund police services. This impact was determined to be less than significant.

Response 230.11

The commenter states that the increased population will add to traffic congestion, will add CO_2 to the air, and will increase impacts to road surfaces. The commenter states that it is unclear whether suggested mitigation (bus lines and bike paths) will be required. The commenter asserts that most people will continue to drive.

Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion.

Greenhouse gas (GHG) emission impacts are addressed under Impact GHG-1, beginning on page 4.8-17 of the Draft EIR. As stated therein, the project would increase GHG emissions, and Mitigation Measure GHG-1 would be required; however, impacts would remain significant and unavoidable.

Please refer to Response 95.1 regarding roadway degradation impacts.

The commenter appears to be referring to Mitigation Measure TRA-1. The implementation of this measure is required for each future development project and requires the preparation of a Transportation Demand Management (TDM) Program. The mitigation measure provides a list of transportation demand reduction strategies that may be included in future TDM Programs; however,

the exact requirements of future TDM Programs is unknown at this time. Bus lines and bike paths are two potential reduction strategies that may be included in future TDM Programs.

Response 230.12

The commenter states that the increased housing in Forestville will have a significant impact to traffic on Mirabel Road and Front Street, which are already heavily impacted by heavy use of gravel trucks along with 'normal' traffic. The commenter states they were unable to find any reference to Mirabel Road in Section 4.16 of the EIR.

Please refer to Appendix TRA to the Draft EIR for the traffic congestion LOS analysis, which is provided for informational purposes only. This study includes the intersection of Front Street and Mirabel Road as one of the study intersections for the LOS analysis. Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion.

Response 230.13

The commenter states that Mirabel Road and Front Street have little to no shoulder, are dangerous to walk on or ride bikes one, have no sidewalks, have no bike paths, and have no traffic lights. The commenter asserts that these roads do not provide safe conditions for passage to the downtown area.

The commenter is describing the existing condition of local roadways; please refer to Master Response EXST regarding existing conditions of infrastructure. Traffic safety impacts related to implementation of the proposed project are described under Impact TRA-2.

Response 230.14

The commenter states that Forestville High School (El Molino) is no longer an option, and high school students must travel to Sebastopol or elsewhere for school. The commenter states that this adds to traffic concerns and congestion and GHG emissions, which would be exacerbated by the project.

El Molino High School was not included in the analysis—please refer to Table 4.15-2 on page 4.15-3 of the Draft EIR, where West Sonoma County Union High School is identified as serving the Forestville sites.

Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion.

Greenhouse gas (GHG) emission impacts are addressed under Impact GHG-1, beginning on page 4.8-17 of the Draft EIR. As stated therein, the project would increase GHG emissions, and Mitigation Measure GHG-1 would be required; however, impacts would remain significant and unavoidable.

Response 230.15

The commenter asserts that the EIR incorrectly states that a school is located across from FOR-2.

The commenter is correct; page 4.1-18 of the Draft EIR has been revised as follows:

> …They are situated close to the roadway and are landscape in a varied but unified manner. ~~On Mirabel Road, a school is directly across the street from FOR-2.~~ The residential development on Mirabel Road features a less unified design than that on Giusti Road…

Response 230.16

The commenter states that the EIR identifies significant and unavoidable transportation impacts, and that Mirabel Road and Front Street are important roads to discuss related to this impact. The commenter asserts that FOR-2 has the highest population buildout of all parcels listed, but Table 4.8-6 indicates the project is consistent with reducing travel demand. The commenter asserts that this is not true for FOR-2, due to distances to work, grocery stores, high school, etc.

The commenter is referencing traffic congestion impacts, where specific roadways are typically analyzed. The EIR primarily uses VMT to assess transportation impacts, which does not necessitate the analysis of individual roadways. Please refer to Appendix TRA to the Draft EIR for the traffic congestion LOS analysis, which is provided for informational purposes only. Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion.

While FOR-2 has the highest total population buildout, the maximum dwelling units per acre that would be allowed is not substantially higher than any other Rezoning Site (please refer to Table 2-3, beginning on page 2-23 of the Draft EIR). Because FOR-2 is larger in size than many other identified parcels, the total number of housing units and population that could be accommodated by this site is greater.

There is no Table 4.8-6 in the Draft EIR, so it is unclear which table the commenter is referring to.

Response 230.17

The commenter notes that FOR-2 does not have a sewer hook-up, and surrounding residences use septic. The commenter notes that water is scarce, and continued drought is predicted. The commenter asks if water will be available for future residents on FOR-2, how additional water will be obtained, where sewage would be transported, and if additional sewage ponds would be required.

As described on page 4.18-1 of the Draft EIR and in Appendix WSS to the Draft EIR, FOR-2 is located adjacent to existing water service infrastructure and would be provided water through the Forestville Water District and Sonoma Water. The discussion provided under Impact UTIL-1 includes a water demand calculation for all Forestville sites, and, based on communication with the water service provider, Forestville sites would have access to adequate water service.

Please refer to Table 4.18-2 on page 4.18-2 of the Draft EIR; as stated therein, the Forestville sites would receive wastewater treatment services from the Forestville Water District. Wastewater is treated at the District's Wastewater Treatment Reclamation and Disposal Plant, which has no existing capacity deficiencies. Impact UTIL-1 includes a wastewater generation calculation for all Forestville sites and indicates that wastewater services would be provided by the Forestville Water District. Based on communications with the District, the implementation of proposed capital improvement projects would ensure that development facilitated by the project on Rezoning Sites would have access to adequate wastewater service. However, because FOR-2 is not located adjacent to existing wastewater infrastructure, implementation of Mitigation Measure UTIL-1 would be required. This measure requires future development projects on Rezoning Sites, including FOR-2, to demonstrate adequate wastewater treatment capacity during the plan review and permit approval process. This would determine what specific infrastructure upgrades would be necessary to serve the future project.

Response 230.18

The commenter asks why FOR-2 was not eliminated from consideration, as sewer is not available at this site and water availability and wastewater treatment are unknowns for this site, requiring further study.

Please refer to Master Response SITE regarding the site selection process. While existing water and wastewater infrastructure may not exist on site for every Rezoning Site, each Rezoning Site, including FOR-2, is located within a designated Urban Service Area where public water and sewer service is generally available.

Response 230.19

The commenter asks if FOR-2 has been evaluated relative to hydrology, as it relates to recharge and impervious surfaces. The commenter states that flooding occurs on Mirabel Road during large storms, and housing developments would exacerbate the situation. The commenter asks where drainage would be directed and if it would increase flooding.

Hydrology and water quality are discussed in Section 4.10 of the Draft EIR. Groundwater recharge from the addition of impervious surfaces is addressed under Impact HWQ-2, beginning on page 4.10-25 of the Draft EIR. As stated therein, the County requires compliance with the LID Manual, which requires implementation of permanent operational stormwater BMPs, including stormwater capture basins. Impacts were determined to be less than significant.

Impact HWQ-3, beginning on page 4.10-26 of the Draft EIR, addresses the potential for projects to result in flooding. As described therein, projects would be required to comply with applicable regulations and requirements, which would ensure no alteration of existing drainage patterns in such a way that would increase flooding off-site. Impacts were determined to be less than significant.

Response 230.20

The commenter states that FOR-2 provides habitat for a number of species, including roosting and hunting ground.

Section 4.4 of the Draft EIR provides a discussion of potential impacts to protected species. Please note that only species that are protected by federal, state, or local laws and regulations are required to be discussed under CEQA. Impact BIO-1 addresses impacts related to habitat modifications, and includes Mitigation Measures BIO-1 through BIO-12 to address potential impacts.

Response 230.21

The commenter expresses concerns related to wildfire impacts related to the wildland urban interface (WUI). The commenter notes that wildfire issues have increased in recent years, with two evacuations of the community in the last few years. The commenter states that increasing the population would increase the difficulty of evacuation.

Wildfire impacts are discussed in Section 4.19 of the Draft EIR. This discussion includes a summary of recent wildfire activity in the county, as well as the identification of designated Fire Hazard Severity Zones and State Responsibility Areas within or near each of the Rezoning Sites. Please refer to Impact WFR-2, beginning on page 4.19-26 of the Draft EIR, for a discussion of impacts associated with these mapped wildfire hazard areas. Impacts associated with emergency evacuation plans are addressed

under Impact WFR-1, where it was determined that, despite the additional growth that would be facilitated by the project, the Rezoning Sites are in areas adequately served by emergency services, and there would be no unanticipated strain on emergency evacuation plans or routes.

Response 230.22

The commenter notes that the EIR provides a projection of increased wildfire events in future years. The commenter provides information from the EIR related to FOR-2, and quotes analysis provided in the EIR. The commenter asks why the EIR states that off-site road improvements 'could' be required instead of 'must' be required.

The commenter is correct, road improvements to meet County standards would be a requirement of future projects where adequate site access does not exist. The following revision has been made on page 4.19-26 of the Draft EIR:

> Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways would ~~could~~ be required.

The following typographical revision has been made on page 4.19-26 of the Draft EIR:

> …However, as evidenced by recent wildfires in the County, urban areas, particularly those on the outer edges of urban development, are also susceptible to wildfires, despite ~~the~~ having less abundant typical wildfire fuels.

Response 230.23

The commenter asserts that the addition of higher density housing near a WUI is a bad idea, and mentions the Tubbs fire. The commenter asserts that the fuel load on FOR-2 would be increased by future development. The commenter notes that the EIR concludes there is a significant and unavoidable wildfire impact, and states there is an even greater significant risk for FOR-2.

A high fuel load is characterized by dry, highly flammable vegetation. Future structures would be required to comply with the California Building Code (CBC) and California Fire Code (CFC) requirements, which include requirements for the placement of combustible vegetation, fire protection features, and construction with fire-resistant materials. Therefore, the replacement of dry vegetation with CBC- and CFC-compliant structures would decrease the fuel load on a site.

FOR-2 is not located within a designated FHSZ, unlike other Rezoning Sites; therefore, the commenter's assertion that FOR-2 has a greater wildfire susceptibility than other Rezoning Sites is not correct. As stated on page 4.19-27 of the Draft EIR, Rezoning Sites, including FOR-2, would be subject to the California Fire Code, Sonoma County Code, CCR Title 24 Part 2, and Board of Fire Safe Regulations in CCR Title 14. These regulations include safety measures to minimize the threat of fire, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system and sealing any gaps around doors, windows, eaves and vents to prevent intrusion by flame or embers; fire sprinklers in residential developments (with some exceptions); specific requirements related to exterior wildfire exposure; and minimum development standards for emergency access, fuel modification, setback, signage, and water supply. Collectively, these codes and regulations would reduce the risk of loss, injury, or death from wildfire for new residential developments encouraged by the project, but not entirely. Future development facilitated by

the project on the Rezoning Sites, including on FOR-2, would be subject to Mitigation Measures WFR-1, WFR-2, and WFR-3, which would reduce construction and operational wildfire impacts. Impact WFR-2 concludes that impacts would be significant and unavoidable, despite the implementation of these feasible mitigation measures.

Response 230.24

The commenter suggests that the best location for housing, considering climate change, drought, and wildfire, be studied. The commenter supports open space between communities, and suggests some areas be considered "off-limits" to housing.

This comment does not pertain to the analysis provided in the EIR, and no response is required. The commenter's suggestions are noted and have been passed on to decision-makers for consideration.

Response 230.25

The commenter states that the cumulative impact discussion focuses on GHG emissions, and states that they could not find a discussion of impacts related to travel by new residents of Forestville sites.

Please refer to page 4-2 of the Draft EIR for a discussion of the cumulative impact scenario. Please refer to Impact TRA-2, beginning on page 4.16-14 of the Draft EIR for a discussion of increased VMT related to future development facilitated by the project on Rezoning Sites, including on the Forestville sites.

Response 230.26

The commenter quotes Section 5.2.1 of the EIR, and suggests consideration of alternative locations to avoid identified significant impacts.

Please refer to Response 230.2 regarding consideration of an alternative location.

Response 230.27

The commenter asserts that future development on identified Rezoning Sites will require an additional EIR. The commenter asks how this zoning change can be considered when the environmental feasibility of specific sites is unknown.

Please refer to Section 1.2 of the Draft EIR. As stated therein, the intent of the EIR is to enable future development by-right, without further discretionary approvals. If future development projects are proposed on the Rezoning Sites that require a discretionary action (e.g., a future project is not consistent with the zoning or land use designation and requires a zoning or General Plan amendment), then additional CEQA analysis may be required.

The commenter does not specify which environmental unknowns were not addressed in the EIR. All CEQA-required checklist questions were addressed in Section 4 of the EIR.

Response 230.28

The commenter indicates that Alternative 3 is environmentally superior, and is in the best interest of county residents. The commenter asserts than an alternative location should be evaluated.

The commenter's preference for Alternative 3 is noted and passed on to decision-makers for consideration. Please refer to Response 230.2 regarding consideration of an alternative location.

EIR Public Comment 231

COMMENTER: Lindsay Sullivan

DATE: February 13, 2023

Response 231.1

The commenter expresses concerns regarding the Sunset Avenue, Guerneville site selection and states that while she is a supporter of affordable housing, the addition of 78 units on Sunset Avenue is surprising since the neighborhood is already dense. The commenter states that Sunset Avenue is a narrow, one-lane thoroughfare and it would be impossible to accommodate more parking and traffic. The commenter states that Sweetwater Springs has requested this site to be excluded from the selection process because the land might be needed for future water storage expansion. The commenter states that increasing the density would result in fire safety and evacuation risks.

This comment is noted. The Housing Element proposes to potentially add up to 78 units in this area. Although there is potential for 78 units to be added, if the site would be developed, the actual number of units would be determined at the time an application for development was submitted for the site. There is no guarantee that the site would be developed in the future. Please refer to Master Response SITE for a discussion on how sites were chosen for this effort. No revisions to the Draft EIR are necessary in response to this comment.

This comment is noted. Please refer to Master Response EXST for a discussion of existing conditions and Master Response TRA for a discussion regarding traffic congestion.

Please refer to Master Response SITE for a discussion of the site selection process. Please also refer to Appendix WSS of the Draft EIR for a discussion of utilities, including water supply in Guerneville. As stated in Appendix WSS, "Site GUE-1 houses the main storage and water treatment facilities for Sweetwater Springs Water District. As such, this site would require the treatment plant to be relocated in order to redevelop. Discussions with the District indicated that they will not give up the site." As stated in Response 231.1, there is no guarantee that the site would be developed in the future. No revisions to the Draft EIR are necessary in response to this comment.

Impacts related to Wildfire were discussed in Section 4.19, Wildfire, of the Draft EIR and were found to be significant and unavoidable with mitigation as it would not be possible to prevent a significant risk of wildfires or fully protect people and structures from the risks of wildfires. Please also refer to Master Response FIRE for a discussion of wildfire within the county and Master Response EMG for a discussion on emergency access. No revisions to the Draft EIR are necessary in response to this comment.

Response 231.2

The commenter expresses her opposition to including housing sites in unincorporated towns since the towns lack infrastructure to support an increase in population and do not have enough jobs for long-term employment.

This comment is noted. Please refer to Master Response EXST for a discussion of existing conditions within the county. No revisions to the Draft EIR are necessary in response to this comment.

EIR Public Comment 232

COMMENTER: Lisa Nahmanson

DATE: February 13, 2023

Response 232.1

The commenter states that they are a resident of Forestville and a Forestville representative on the Lower Russian River MAC and on the Land Use Committee. The commenter expresses disapproval of the number of housing units and expresses the opinion that many of the sites chosen should be eliminated to reduce impacts. The commenter states that they have experienced fires and flooding while living in Forestville, and expresses concerns with the impact of dense housing in wildland-urban interface during evacuation periods.

This comment is noted and will be passed on to decision-makers. Please refer to Master Response EMG regarding evacuations.

Response 232.2

The commenter states that they liveon a one-lane road portion of Giusti Road, and the commenter expresses concerns regarding the proposed rezoning at 6898 Nolan Road. The commenter asks how the parcel would be developed, whether it would be developed as a mini development with one ingress/egress off Mirabel Road, or would the ingress/egress be from Nolan Road between two existing homes.

Regarding resident access, please note that access to future development at the rezoning site will be designed and decided on when development has been proposed and approved for the site. At this time, no development has been proposed so an exact description of what site access will look like cannot be provided.

Response 232.3

The commenter asks how the sewer and water lines would be able to accommodate the development, as well as power infrastructure and fire lanes to fit current codes.

Please refer to Master Response UTIL regarding sewer and water infrastructure. Additionally, please refer to Master Response EMG regarding emergency services and evacuation routes. As discussed in Section 4.18, *Utilities and Service Systems*, in the Draft EIR impacts to electric power infrastructure would be less than significant.

Response 232.4

The commenter expresses concerns regarding lighting, noise, dust, and removing the apple orchard.

Please refer to Section 4.1, Aesthetics, in the Draft EIR. As discussed therein, mitigation measure AES-5, which sets outdoor lighting requirements, would reduce impacts related to light and glare to less than significant. Additionally, as discussed in Section 4.1, the project could have significant impacts on scenic public views including views of agriculture and viticulture. As discussed in Section 4.13, *Noise*, in the Draft EIR, impacts related to noise would be potentially significant and would require mitigation

measures NOI-1 through NOI-6. Additionally, please refer to Section 4.3, Air Quality, in the Draft EIR. As stated therein, on page 4.3-18 impacts related to fugitive dust would be less than significant as the project would be required to incorporate best management practices for the control of fugitive dust and would be required to adhere to mitigation measure AQ-1 which sets basic construction requirements to reduce emissions of reactive organic gases, nitrogen oxides, and particulate matter.

Response 232.5

The commenter raises concerns regarding fire evacuations with more residents, the lack of infrastructure, and impacts on the Lower Russian River.

Please refer to Master Response EMG regarding evacuations and Master Response UTIL regarding infrastructure impacts.

Response 232.6

The commenter expresses the opinion that the community lacks effective broadband and mobile phone connections.

Please refer to Section 4.18, *Utilities and Service Systems*, in the Draft EIR. As stated on page 4.18-15 of the Draft EIR, impacts related to telecommunications infrastructure would be less than significant.

Response 232.7

The commenter expresses the opinion that the community lacks sidewalks, bike lanes, and standard road widths. The commenter states that they don't have enough parking spaces to handle tourists in the summer.

Please refer to Master Response EXST regarding existing infrastructure in and around the rezone sites. Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

Response 232.8

The commenter states that the community does not have enough trash, recycling, and compost infrastructure which is a public health issue.

Please refer to section 4.18, *Utilities and Service Systems*, in the Draft EIR. A discussed therein, the project would not result in excess solid waste and impacts related to solid waste would be less than significant.

Response 232.9

The commenter states infrastructure impacts to current residents should be considered and further conversations on how to proceed with affordable housing need to be had.

Please refer to Master Response UTIL regarding infrastructure impacts. The rest of this comment is noted and will be passed on to decision-makers.

EIR Public Comment 233

COMMENTER: Lois Pearlman

DATE: February 13, 2023

Response 233.1

The commenter expresses opposition to the housing sites on Laughlin Road, Sunset Avenue, and Cutten Avenue. The commenter states there are steep one-lane roads and the lack of public transit would not be able to accommodate the increase in residents. The commenter opines regarding inadequate parking spaces and the proposed project would change the nature of the rural neighborhood.

Refer to Master Response EXST regarding existing conditions such as one-lane roads, distance to transit, inadequate parking.

Response 233.2

The commenter expresses the opinion that communities should get together to identify appropriate sites for high density housing. The commenter states that some of the new housing should be affordable for low-income residents, and some of it should be subsidized.

Refer to Master Response SITE regarding the site selection process. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes affordability of units.

EIR Public Comment 234

COMMENTER: Lorna Catford

DATE: February 13, 2023

Response 234.1

The commenter expresses the opinion that new housing should be located in the area south of Highway 116 and east of the walking trail.

The commenter's opinion is noted. Refer to Master Response HE.

Response 234.2

The commenter asks if housing is built on the lot behind the elementary school on Paul Paddock's driveway, would traffic enter from Van Keppel or off Highway 116. The commenter also asks how the increased traffic would affect children going to school.

The commenter is presumably referring to FOR-4. Site access would be determined on a site-specific basis once individual development proposals are submitted. Refer to Master Response TRA regarding traffic. Impacts relating to bicycle and pedestrian safety are discussed in Section 4.16, *Transportation*, of the EIR, under Impact TRA-1. As stated therein, no significant impacts would occur. As stated therein, "In addition, in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks. No features are proposed that would conflict with County or regional plans, policies or ordinances pertaining to pedestrian facilities or travel."

Response 234.3

The commenter asks if the proposed buildings off Covey Road could be hidden so they aren't visible from the road. The commenter expresses concerns regarding the safety of kids walking to and from school with increased traffic.

The commenter is presumably referring to FOR-1. Exact locations of buildings on-site, as well as full site layout plans, would be determined based on individual development proposals, once submitted. Refer to Response 234.2 regarding pedestrian safety.

EIR Public Comment 235

COMMENTER: Madeline Solomon

DATE: February 13, 2023

Response 235.1

The commenter opines that the Draft EIR process should be illegal due to inadequacies of the report and the public review period.

The commenter's opinion is noted.

Response 235.2

The commenter states that they did not receive notice of the public review and comment period and was not aware of the existence of the DEIR. The commenter requests for all Permit Sonoma documents with public comment periods relevant to Forestville to be placed in both the Forestville and Sebastopol libraries. The commenter expresses the opinion that submission of the DEIR and failure to meet the requirements for public noticing and commenting would constitute fraud, and the State should be notified.

Please refer to Response 21.7.

Response 235.3

The commenter expresses the opinion that the Electro Vectro site (FOR-1) should be removed due to the severity of contamination of both dust and groundwater. The commenter expresses the opinion that the DEIR inadequately addresses contamination on the site, and should have determined that the contamination would require significant, costly, and potentially dangerous mitigation before building housing.

Refer to Response O-2.3 regarding the Electro Vector site. The proposed project does not include any development on FOR-1 or any other site. As discussed in Section 4.9, *Hazards and Hazardous Materials*, in the Draft EIR it is noted that there is contamination on the FOR-1 site, however with required investigation, remediation and cleanup under the supervision of the Regional Water Quality Control Board, the Sonoma County Local Oversight Program, or DTSC and adherence to the California Health and Safety Code, impacts related to hazards would be less than significant. Project-specific mitigation measures are not included as part of the Draft EIR because as a programmatic EIR, in accordance with CEQA Guidelines, it is not analyzing any specific development project proposed for the FOR-1 site, or any individual site.

Response 235.4

The commenter expresses the opinion that the 6090 Van Keppel site should be removed since Van Keppel Road is inadequate and unsafe and would not be able to support the increase of 65 new residents. The commenter also states that 6090 Van Keppel is not an address since it is not associated with a parcel identified with a parcel number in the Sonoma County Assessor parcel number database. The commenter claims them and their neighbors are confused about the location of the property, and they found that the parcel is associated with a property address on Highway 116, near Forestville School.

Please refer to Response 131.1.

Response 235.5

The commenter states that the property that Permit Sonoma (but not Sonoma County Assessor) recognizes as 6090 Van Keppel is located adjacent and slightly upslope from the contaminated Forestville School, and close to and slightly downslope from the contaminated Electro Vector site (FOR-1).

Please refer to Response 131.1 regarding 6090 Van Keppel Road and Response 235.3 regarding contamination of the FOR-1 site. Refer to Master Response EXST regarding the current location and existing contamination in the Forestville area. These conditions are not caused by the project and are current baseline conditions.

Response 235.6

The commenter states that they have ideas for increasing affordable housing in Forestville and hopes to be invited to Town Hall meetings and focus groups to discuss housing. The commenter states the proposal should align with the County General Plan.

This comment is noted. Refer to Table 4.11-2 regarding consistency with specific policies in the County General Plan.

EIR Public Comment 236

COMMENTER: Marci Mascorro

DATE: February 13, 2023

Response 236.1

The commenter expresses opposition to the proposed rezoning in Armstrong Valley.

Refer to Master Response HE regarding opposition to the project.

Response 236.2

The commenter expresses the opinion that there is insufficient infrastructure to accommodate an increase in over 600 households. The commenter states that the existing sewer system is inadequate, and California Water does not have enough water stored to accommodate the additional households.

Refer to Master Response EXST regarding the existing condition of infrastructure. Refer to Master Response UTIL regarding sewer and water infrastructure.

Response 236.3

The commenter opines on California state housing policy and states that there is only one road to evacuate Armstrong Valley, and expresses concerns regarding evacuation during emergencies such as fires or floods. The commenter states that Armstrong Valley is located in an urban interface wildfire zone, and asks how affordable housing can be built with the high cost of requirements brought on by the new code.

Wildfire impacts are discussed in Section 4.19 of the Draft EIR. Impacts associated with emergency evacuation plans are addressed under Impact WFR-1, where it was determined that, despite the additional growth that would be facilitated by the project, the Rezoning Sites are in areas adequately served by emergency services, and there would be no unanticipated strain on emergency evacuation plans or routes. Refer to Master Response EMG regarding requirements for access points.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes cost of housing development.

Response 236.4

The commenter expresses the opinion that developers benefit at the detriment of the community. The commenter states that they are neither for nor against additional housing, but expresse disapproval of the unsustainable densities proposed for Armstrong Valley.

The commenter's opposition and opinions are noted and will be passed on to decision-makers.

EIR Public Comment 237

COMMENTER: Marilyn Cannon

DATE: February 13, 2023

Response 237.1

The commenter requests removal of site FOR-2 under Alternative 3. The commenter states that there is insufficient water and sewer to accommodate the increase in population and the density proposed is inconsistent with the neighborhood, and would substantially increase air pollution and traffic.

The commenter's opinion is noted and passed on to decision-makers for consideration. Please refer to Master Response TRA regarding traffic congestion. Please refer to Section 4.3, *Air Quality*, of the Draft EIR for a discussion of air quality impacts.

Response 237.2

The commenter raises concerns regarding wildfires since site FOR-2 is located approximately 99 feet from a moderately high severity fire zone. The commenter states that it is difficult to evacuate the town due to extreme congestion. The commenter asserts that adding hundreds and thousands of new residents would result in substantial impacts to traffic and safety.

Please refer to Master Response FIRE regarding wildfire impacts, Master Response EMG regarding emergency evacuation, Master Response EXST regarding existing conditions of infrastructure, and Master Response TRA regarding traffic congestion.

Response 237.3

The commenter asserts that Forestville is located away from grocery shops and hospitals, and therefore is not suitable to accommodate an increase in population. The commenter states that many large gravel trucks traverse Mirabel Road and Front Street through Forestville, and adding more vehicles would be dangerous and cause even more congestion on these two-lane roads.

Please refer to Master Response TRA regarding traffic congestion.

Response 237.4

The commenter states that since El Molino High School has been permanently closed, all high school students from Forestville who used to attend El Molino High School would be required to be transported to Analy High School. The commenter expresses his concern that students walking to the elementary Forestville School would be endangered by increased traffic since there is no buffer zone between them and cars. The commenter asserts that FOR-2 has greater than average environmental constraints.

Please refer to Master Response TRA regarding traffic congestion. Potential impacts related to pedestrian facilities are discussed under Impact TRA-1, beginning on page 4.16-14 of the Draft EIR. Potential impacts related to traffic safety are discussed under Impact TRA-2, on page 4.16-18 of the Draft EIR.

The commenter's preference for the removal of FOR-2 is noted and passed on to decision-makers for consideration.

EIR Public Comment 238

COMMENTER: Mark Berry

DATE: February 13, 2023

Response 238.1

The commenter expresses opposition for the rezoning of sites in the Forestville area, specifically FOR-2. The commenter owns the property adjacent to site FOR-2, and states that most homes built around the dry orchard parcel (FOR-2) are single-family homes with septic systems.

The commenter's opposition is noted and passed on to decision-makers for consideration. Please refer to Master Response HE regarding opposition to specific Rezoning Sites. Please refer to Master Response EXST regarding existing conditions.

Response 238.2

The commenter expresses an opinion that the FOR-2 site is incompatible because there is no established water or sewer infrastructure; water resources are already at maximum capacity; Mirabel Road has a 45 mph speed limit and is unsafe for pedestrians and bicyclists; there are limited basic services; most trees on the parcel would be removed during construction; and development on the FOR-2 site would be inconsistent with the scale and character of the rural neighborhood. The commenter recommends for housing to be developed in communities with built-in infrastructures already that could accommodate a large population such as Santa Rosa, Rohnert Park, Windsor, and Cotati.

Please refer to Master Response UTIL regarding water and wastewater service availability, and Master Response SITE regarding the site selection criteria. Impacts relating to bicycle and pedestrian safety are discussed in Section 4.16, *Transportation*, of the EIR, under Impact TRA-1. As stated therein, no significant impacts would occur.

This comment regarding availability of basic services does not pertain to the environmental impact analysis presented in the Draft EIR.

The potential for tree removal is acknowledged on page 4.4-40 of the Draft EIR; however, compliance with County-required policies related to heritage trees and tree removal (which apply to all projects in the County, regardless of CEQA requirements) is determined to be adequate to reduce impacts to less than significant.

Regarding community character, please refer to Impact AES-3, beginning on page 4.1-56 of the Draft EIR in Section 4.1, *Aesthetics*, regarding potential impacts of rezoning and future development of the rezoning as it relates to visual character or quality.

The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements.

EIR Public Comment 239

COMMENTER: Mark Molofsky

DATE: February 13, 2023

Response 239.1

The commenter requests for parcels APN 054-290-057 and APN 054-290-084 to be removed from the Housing Element Update. The commenter states that the scope, scale, and proposed use exceed development envisioned for downtown Glen Ellen. The commenter states that aesthetics and construction quality would need to be a major element in any future build on the sites.

The commenter's opinion is noted and passed on to decision-makers for consideration. Please refer to Master Response HE regarding opposition to specific Rezoning Sites. Potential impacts related to aesthetics are described in Section 4.1, *Aesthetics*, of the Draft EIR. Additionally, please refer to Response 70.3 regarding design guidelines applicable to the Glen Ellen Rezoning Sites.

EIR Public Comment 240

COMMENTER: Mary Clare Cawley

DATE: February 13, 2023

Response 240.1

The commenter raises questions and comments on sites FOR-1, FOR-2, FOR-3, FOR-4, FOR-5, and FOR-6 of the Housing Element Update. The commenter asks how people would be able to walk on streets or cross streets safely with an increase in population. The commenter expresses concern regarding site FOR-2, and states that Mirabel Road has a speed limit of 45 mph with no sidewalks or crosswalks.

Please refer to Master Response EXST regarding existing conditions of infrastructure. Please refer to Section 4.16, *Transportation,* of the Draft EIR. As discussed on page 4.16-15, development facilitated by the project on Rezoning Sites would propose no features that would be hazardous to pedestrians, nor is it forecast to generate pedestrian demand that would exceed the capacity of the area's pedestrian network. In addition, in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations.

Response 240.2

The commenter states that the increase in population would increase the traffic in Forestville and expresses her concerns regarding a potential accident during emergency evacuation. The commenter asks if there is a plan that would address how a larger population would effectively evacuate Forestville, and what air quality impacts there are resulting from the increase in traffic.

Please refer to Master Response TRA regarding traffic congestion, and Master Response EMG regarding emergency evacuation. Traffic safety impacts associated with the proposed project are addressed under Impact TRA-2, on page 4.16-18 of the Draft EIR.

The comment regarding the potential for an accident to occur during an emergency situation, which is speculation and does not warrant a response.

Response 240.3

The commenter expresses concerns regarding utilities such as sewer, water supply, and PG&E which is already currently an issue in Forestville. The commenter states that adding a large number of people despite a significant and unavoidable finding in the DEIR for new or expanded water and wastewater facilities is inappropriate as access to running water and wastewater facilities is a basic requirement.

Please refer to Master Response EXST regarding existing conditions of infrastructure. CEQA does not require mitigation of existing conditions. Please refer to Master Response UTIL regarding water and wastewater impacts. A significant and unavoidable impact was only determined for Rezoning Sites GEY-1 through GEY-4, due to inadequate evidence of adequate utility service.

The commenter is incorrect; the Draft EIR does not state that there would be inadequate water supplies for normal, dry, and multiple dry years. As described under Impact UTIL-1, with the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites would have access to adequate water service.

Impacts related to PG&E service, including electric power and natural gas, are described on page 4.18-15 of the Draft EIR. As noted therein, adequate infrastructure and supply exists, and impacts were determined to be less than significant.

Response 240.4

The commenter states that there are no grocery stores in Forestville, and residents are currently travelling more than 7 miles to access grocery stores in Santa Rosa and Sebastopol. The commenter expresses the opinion that new large development should not be constructed in an area with no personal services.

Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Resident proximity to grocery stores is an existing condition of the area and not caused by the proposed project.

The commenter's opinion has been noted and is passed on to decision-makers for consideration.

Response 240.5

The commenter raises concerns regarding evacuations during wildfires, and states that the project does not analyze the ability for Forestville to evacuate safety and quickly. The commenter states that the significant unavoidable impact determination for whether the project would expose occupants and structures to wildfire risks is unconscionable and irresponsible, and high-density housing should not be allowed in the area.

Please refer to Master Response FIRE regarding wildfire impacts. The commenter's opposition to the Housing Element is noted; please refer to Master Response HE.

Response 240.6

The commenter expresses the opinion that it is unfair Forestville is being impacted more significantly than any other town and that significant impacts outlined in the DEIR should be avoidable. The commenter states that at a minimum, running water and functioning sewer should be ensured before housing can be built.

The commenter's opinion is noted and passed on to decision-makers for consideration. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes perceived fairness and equity.

EIR Public Comment 241

COMMENTER: Megan Cohen

DATE: February 13, 2023

Response 241.1

The commenter expresses the opinion that the site at 6898 Nolan Road (FOR-2) is not a suitable option. The commenter states that the Forestville community needs more affordable housing, and that she would likely qualify for affordable housing. The commenter expresses the opinion that the scope of the proposed development is not a suitable match for site FOR-2.

The commenter's opinion is noted and passed on to decision-makers for consideration.

Response 241.2

The commenter expresses concerns regarding safe evacuation, since the layout and condition of roads, specifically Mirabel Road, makes evacuation difficult. The commenter states that the neighborhood is vulnerable to flooding, and it would be unsafe to substantially increase the population.

Please refer to Master Response EMG regarding emergency evacuation.

Response 241.3

The commenter *states that current residents are already experiencing planned and unplanned outages due to an overtaxed power grid, and states that there should be solutions to strengthen the infrastructure before accommodating hundreds more of people.*

Please refer to Master Response EXST regarding existing conditions of infrastructure. Impacts related to electric power are described on page 4.18-15 of the Draft EIR. As noted therein, adequate infrastructure and supply exists, and impacts were determined to be less than significant.

Response 241.4

The commenter questions how transportation will be safe since there is limited sidewalks and minimal transit. The commenter expresses the opinion that adding more residents to the area would result in substantial impacts to congestion on Mirabel Road, Nolan Road, and Giusti Road. The commenter expresses the opinion that the large size of the proposed development would be dangerous for future residents as well as current residents. The commenter urges to planning commission to reconsider the site on Nolan Road and to partner with local residents to find a more suitable site.

Please refer to Master Response TRA regarding traffic congestion. Roadways in the area would be subject to increased use through construction and residential traffic, which could result in accelerated deterioration. The County collects countywide traffic development fees pursuant to Article 98 of Chapter 26 of the Sonoma County Code. The payment of these fees by each individual project would alleviate cumulative roadway deterioration impacts to the regional road network.

Potential impacts related to traffic safety are discussed under Impact TRA-2, on page 4.16-18 of the Draft EIR.

The commenter's opinion is noted and passed on to decision-makers for consideration.

EIR Public Comment 242

COMMENTER: Melissa Kemp

DATE: February 13, 2023

Response 242.1

The commenter expresses opposition to rezoning seven sites in Forestville since it would result in substantial issues rather than improve the town.

The commenter's opposition is noted and passed on to decision-makers for review. Please refer to Master Response HE.

Response 242.2

The commenter expresses the opinion that Forestville lacks adequate services to accommodate a large increase in population. The commenter states that Forestville has limited public transportation, job opportunities, and local services. The commenter suggests the adequacy of the existing public transit system should be studied. The commenter states that the impact of increased traffic on roads prone to flooding should also be studied. The commenter also states that the adequacy of public services and parks should be studied.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes job growth and impacts to local commercial businesses.

Please refer to Master Response EXST regarding existing conditions and services. Please refer to Master Response TRA regarding traffic congestion. Potential impacts to public services and parks were analyzed in Section 4.15, *Public Services and Recreation* of the Draft EIR.

Response 242.3

The commenter expresses the opinion that the proposed sites would result in increased traffic, VMT, and pollution; land disruption via parking that would need to be developed as well as that required to address drainage and flooding mitigation; further land disruption through the development of general services; and would not be consistent with the goal of connecting low-income residents with affordable housing that supports their employment and access to services.

Please refer to Master Response TRA regarding traffic congestion. Impact discussions referenced by the commenter include mitigation measures where appropriate, to reduce potential impacts as much as feasible.

The comment regarding land disruption due to parking, drainage, flood mitigation, and general services is speculative and does not require a response. Furthermore, parking is not considered an environmental impact and is not required to be analyzed under CEQA.

The commenter does not provide evidence that low-income housing would not provide affordable housing; this comment does not warrant a response. Please refer to Master Response SITE regarding the site selection criteria.

Response 242.4

The commenter requests the County to update Alternative 3 to remove the seven Forestville sites since existing services and infrastructure is inadequate to accommodate the proposed increase in residents. The commenter states the County should instead invest in improving existing services and economic activity, which would enable Forestville to eventually expand and welcome new residents.

Please refer to Master Response EXST regarding existing conditions and services, including road infrastructure. Potential impacts to public services and parks were analyzed in Section 4.15, *Public Services and Recreation* of the Draft EIR.

Please refer to Master Response TRA regarding traffic congestion-related impacts.

Drainage and flooding impacts were addressed in Section 4.10, *Hydrology and Water Quality*, of the Draft EIR. Please refer to Impact HWQ-3 and Impact HWQ-4.

Alternative 3, discussed in Section 6 of the Draft EIR, provides a project alternative that would remove some Rezoning Sites. The commenter's suggestion of removing all FOR sites from rezoning would not be substantially different from Alternative 3. The commenter's preference for this modification is noted and passed on to decision-makers for consideration.

EIR Public Comment 243

COMMENTER: Michael and Sherry Kane

DATE: February 13, 2023

Response 243.1

The commenters state they recognize the need for additional affordable housing, and reference an article from the Press Democrat that states the County has an aging population.

This comment is noted. This comment does not pertain to the adequacy of analysis within the Draft EIR.

Response 243.2

The commenters raise their concerns regarding road infrastructure and transportation, and state that the single road in and out of Forestville is already inadequate to handle the current population. The commenters state that there are limited sidewalks, crosswalks, and streetlights in the downtown area. The commenters express the opinion that the increase in non-electric vehicles would impact air quality, and a study should be prepared to see if the only gas station in town is adequate. The commenters also state that the County's bus system schedule should be improved for workers and the senior population.

Please refer to Master Response TRA regarding traffic impacts; Master Response EMG for emergency access and evacuation; and Master Response EXST regarding existing conditions and infrastructure. For information regarding impacts to air quality, please refer to Section 4.3, *Air Quality,* of the Draft EIR.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes availability of gas stations.

The commenter's suggestion regarding bus service is noted and will be passed on to decision-makers.

Response 243.3

The commenters state that the Forestville wastewater treatment plant is adequate for the current population but would be required to be re-engineered to accommodate the additional residents.

Please refer to Master Response UTIL regarding existing utility service systems.

Response 243.4

The commenters state that existing police and fire/EMT would not be adequate to serve an increased population. The commenters express the opinion that a bus system with better schedule would be beneficial for residents to commute to doctor's appointments.

The potential need for additional police and fire services are analyzed in Section 4.15, *Public Services and Recreation,* of the Draft EIR. As discussed therein, development facilitated by the project on Rezoning Sites would not result in substantial adverse physical impacts associated with the construction of new or physically altered police and fire facilities. The commenter's suggestion regarding bus service is noted and will be passed on to decision-makers.

EIR Public Comment 244

COMMENTER: Michael Nicholls

DATE: February 13, 2023

Response 244.1

The commenter expresses objection towards rezoning sites GUE-1, GUE-2, GUE-3, and GUE-4 in Guerneville.

Please refer to Master Response HE regarding opposition to the Housing Element.

Response 244.2

The commenter expresses the opinion that sites GUE-1 through 4 are located far from transit and lack infrastructure to accommodate dense housing.

Section 4.16 of the Draft EIR acknowledges that none of the Rezoning Sites are within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor. The commenter does not specify what type of infrastructure they are referring to; however, Refer to Master Response UTIL regarding utility infrastructure to serve the project.

Response 244.3

The commenter expresses the opinion that although affordable workforce housing is needed along the Lower Russian River, but the increase of more than 600 residents would not support the level of workforce in the local community and would lead to increases in GHG since future residents would commute elsewhere for employment.

Potential impacts to GHG emissions are discussed in Section 4.8, *greenhouse Gas Emissions.* As discussed therein, development facilitated by the project on Rezoning Sites would not exceed GHG emission project-level or plan-level thresholds and would be consistent with the goals of the California Air Resources Board 2017 Scoping Plan, the Association of Bay Area Governments' Plan Bay Area 2040, the County's General Plan, and the County's Climate Change Action Resolution.

Response 244.4

The commenter expresses the opinion that sites for workforce housing should be located within the County's employment hubs such as Healdsburg, Cotati, Rohnert Park, Windsor, Petaluma, and Santa Rosa.

Please refer to Master Response SITE regarding the site selection process. The proposed project involves rezoning to facilitate implementation of the Sonoma County Housing Element; Sonoma County does not have authority to rezone parcels within other cities in the county as they are separate jurisdictions. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Healdsburg and Windsor, have their own ABAG-assigned RHNA and housing elements.

Response 244.5

The commenter expresses the opinion that the County Government Center in Santa Rosa should be considered for dense workforce housing and asks if underutilized parking structures near/within downtown Santa Rosa was considered for multi-story housing.

Refer to Response 244.4.

Response 244.6

The commenter asks why the airport corridor (Brickway Boulevard, Copperhill Parkway, Skyline Boulevard) was not designated for workforce housing, since the area is in proximity to transportation corridors and includes the appropriate infrastructure to accommodate a growth in population.

Please refer to Master Response SITE regarding the site selection process.

EIR Public Comment 245

COMMENTER: Mike Gray and Susan Ryan

DATE: February 13, 2023

Response 245.1

The commenter states that the community surrounding Laughlin Road in Guerneville opposes the rezoning of GUE-2, GUE-3, and GUE-4.

Refer to Response 14.1.

Response 245.2

The commenter expresses concerns regarding utility availability and evacuation routes near rezoning sites GUE-2 and GUE-3.

Refer to Response 14.2.

Response 245.3

The commenter expresses concerns regarding water and sewer services near rezoning sites GUE-2 and GUE-3.

Refer to Response 14.3.

Response 245.4

The commenter states that rezoning sites GUE-2, GUE-3, and GUE-4 are within high fire hazard zones, floodplains, and earthquake risk areas and are zoned as subject to high susceptibility to liquefaction. The commenter states that building in high fire zones and floodplains is contrary to the County General Plan.

Refer to Response 14.4.

Response 245.5

The commenter states that rezoning sites GUE-2, GUE-3, and GUE-4 are within high fire hazard zones, floodplains, and earthquake risk areas and are zoned as subject to high susceptibility to liquefaction. The commenter states that building in high fire zones and floodplains is contrary to the County General Plan.

Refer to Response 14.5.

Response 245.6

The commenter states that rezoning sites GUE-2, GUE-3, and GUE-4 are inconsistent with the County General Plan, Housing Element Policies, and Bay Area 2050.

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 245.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 246

COMMENTER: Mitchell Genser

DATE: February 13, 2023

Response 246.1

The commenter expresses the opinion that creating more affordable housing should be carried out in a progressive manner and should not be disruptive to current residents.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

Response 246.2

The commenter expresses opposition towards the construction of 635 new units and the addition of 1,652 new residents in Forestville. The commenter states that site FOR-2 would result in a population increase of 736 people, which would result in substantial impacts on Covey Road and the entirety of Forestville.

Please refer to Master Response HE regarding opposition to the Housing Element and Master Response EXST regarding impacts to existing infrastructure.

Response 246.3

The commenter recommends selecting only one or two of the FOR sites with a maximum population increase of 250 people. The commenter states that the proposed project would reduce the livability and desirability of the town.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

EIR Public Comment 247

COMMENTER: Anonymous

DATE: February 13, 2023

Response 247.1

The commenter expresses the opinion that development of site FOR-4 would lead to significant impacts to wetland and riparian habitats since Van Keppel and the single-lane dirt road easement over property APN 083-073-009 infringe on riparian corridor setbacks. The commenter states that property APN 083-073-009 is bisected by a year-round creek that floods during heavy rains and wetland habitats. The commenter states that the current conditions of the roads would not be able to accommodate proper fire evacuation for the proposed population increase. The commenter also states that since Travis Road is the only entryway for the Forestville Elementary School, if access to site FOR-4 is via Travis Road, the impacts from the increase in traffic would pose as a safety concern to the school and children.

Please refer to Master Response EMG regarding fire evacuation and Master Response TRA regarding traffic impacts. Impacts relating to bicycle and pedestrian safety are discussed in Section 4.16, *Transportation*, of the EIR, under Impact TRA-1. As stated therein, no significant impacts would occur. As discussed in Section 4.4, *Biological Resources*, in the Draft EIR impacts to riparian habitats and wetlands would be significant; however, Mitigation Measures BIO-13 through BIO-16 would be required to minimize impacts to less than significant.

Response 247.2

The commenter states that site FOR-1 is currently listed by the State as contaminated with trichloroethylene, and proposed housing would pose as significant public health concern to future residents. The commenter recommends building public parking at site FOR-1 which could also be used as an emergency coordination center during fire or flood events.

Please refer to Response 235.3.

Response 247.3

The commenter expresses the opinion that sites FOR-1 through FOR-6 should not be allowed with no public hearing and local input given that the County did not allow an expedited process to create a downtown open space park on the main corridor of Highway 116 after eight years of public discussion. The commenter expresses her opposition to the project since the rezoning would result in significant impacts with no feasible mitigation.

This comment is noted and will be passed onto decision-makers. Regarding significant impacts, the commenter is correct that the project would result in significant and unavoidable impacts to the environment. To that end, to certify the EIR and approve the project, the County would adopt a Statement of Overriding Considerations pursuant to *CEQA Guidelines* Section 15093. This statement must explain the County's decision to approve the project that balances the project's economic, legal, social, technological or other benefits against its unavoidable environmental risks.

The commenter is incorrect that there was no public hearing for the project. Refer to Section 1.2, *Environmental Review Process*. As stated therein, "the Planning Commission received verbal comments on the Draft EIR during the public hearing on February 2, 2023." Additionally, the Planning Commission and Board of Supervisors will both have public hearings on the Final EIR for recommendation and approval on the project.

Response 247.4

The commenter expresses the opinion that the rezoning in Forestville would result in aesthetic impacts and disrupt the rural character of the town since there are currently no multi-story apartment buildings.

Please refer to Section 4.1, *Aesthetics*, in the Draft EIR. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Response 247.5

The commenter expresses the opinion that the town would not be able to accommodate increased traffic without installing safe pedestrian corridors. The commenter recommends allowing subdivisions with ¼ acre lots with a maximum of two-story townhouse duplex units instead of apartment buildings which would preserve the rural aesthetics of Forestville.

Please refer to Master Response EXST regarding the existing conditions on the rezone sites and Master Response TRA regarding traffic. The commenter's recommendation is noted and will be passed on to decision-makers.

EIR Public Comment 248

COMMENTER: Patricia Brunelle

DATE: February 13, 2023

Response 248.1

The commenter expresses concerns regarding sites FOR-1 through FOR-7 in Forestville, and states that adding 635 additional housing units would severely impact the current residents' quality of life.

The comment does not pertain to a particular environmental issue or the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

Response 248.2

The commenter expresses the opinion that roads in Forestville are narrow with no sidewalks, and the addition of hundreds of people would result in congestion and safety hazards. The commenter asks if there are plans to build new roads to accommodate the increase, and why housing is not planned along transportation corridors such as Santa Rosa.

Please refer to Master Response TRA regarding traffic impacts and Master Response EMG regarding emergency response and evacuation. Refer to Master Response EXST regarding existing road conditions. The proposed project involves rezoning to facilitate implementation of the Sonoma County Housing Element; Sonoma County does not have authority to rezone parcels within Santa Rosa or other cities within the county as they are separate jurisdictions. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements.

Response 248.3

The commenter expresses the opinion that increasing the town's population by 44 percent is inconsistent with rational growth plans, and asks how water, sewage, and police servicing needs could be accommodated. The commenter expresses the opinion that housing should be located in larger cities in proximity to transportation and well served by water and sewer systems.

The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter.

Potential impacts to public services, including police services, are discussed in Section 4.15, *Public Services and Recreation,* of the Draft EIR. As discussed therein, development facilitated by the project on Rezoning Sites would not result in substantial adverse physical impacts associated with the construction of new or physically altered police facilities. Potential impacts to water and wastewater services are discussed in Section 4.18, *Utilities and Service Systems,* of the Draft EIR. As discussed therein, impacts related to water and wastewater services would be less than significant with mitigation.

The proposed project involves rezoning to facilitate implementation of the Sonoma County Housing Element; Sonoma County does not have authority to rezone parcels within Santa Rosa or other cities

within the county as they are separate jurisdictions. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements.

Response 248.4

The commenter states that commute from Forestville to the Smart Train is a 10 mile drive and asks if bus routes or bicycle infrastructure have been planned so residents could walk, bicycle, or bus to work.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

Response 248.5

The commenter asks if the locals were included in discussions when deciding where to locate housing. The commenter also asks if the location of jobs of future residents will be studied in order to make housing convenient to the employment locations.

Please refer to Master Response SITE regarding the site selection process, and a summary of public participation for the Housing Element can be found in Section 1.4 of the Housing Element.

Response 248.6

The commenter requests responses to her questions before adding 635 units to Forestville.

Responses to the commenter's comments are provided in Responses 248.1 through 248.5.

EIR Public Comment 249

COMMENTER: Roberta Schepps

DATE: February 13, 2023

Response 249.1

The commenter expresses opposition to rezoning properties in Guerneville, specifically GUE-2, GUE-3, and GUE-4, located off Armstrong Woods Road, which is a scenic corridor. The commenter states that residents should be included in the identification of viable housing sites. The commenter states that the DEIR notes many specific adverse effects that would impact the health and safety of current and future residents.

Refer to Response 198.1.

Response 249.2

The commenter expresses the opinion that sites GUE-2 and GUE-3 are only accessible via one-lane roads that would require utility upgrades, upgrades which would result in road closures and severely impact emergency egress for residents. The commenter states that road work on Cutten Drive and Laughlin Road must be addressed before initiation of any construction activity, since heavy machinery would not be transported safely to these areas without causing severe access issues.

Refer to Response 198.2.

Response 249.3

The commenter states that the lack of sidewalks or bicycle lanes poses as a safety hazard, and increasing the population would result in accidents and injuries.

Refer to Response 198.3.

Response 249.4

The commenter states that sites GUE-2 and GUE-3 has inadequate potable water and sewer systems.

Refer to Response 198.4.

Response 249.5

The commenter states that sites GUE-2 through 4 are located within a flood zone, high wildfire danger zone, liquefaction zone, and earthquake prone zone. The commenter states that residents in Guerneville are consistently on evacuation status due to floods, fires, and no electricity. The commenter expresses the opinion that the closest hospitals are 30 minutes away and the medical and policing services are inadequate and would not be able to accommodate the increase in population.

Refer to Response 198.5.

Response 249.6

The commenter expresses the opinion that site GUE-3 would result in significant biological resource impacts since it would require the removal of redwoods, which is a known habitat for California Quail, California Grey Foxes, and Osprey. The commenter states that site GUE-3 is also located adjacent to agricultural uses, and Mitigation Measure AG-1 would require an agricultural protection buffer for future development.

Refer to Response 198.6.

Response 249.7

The commenter states that site sensitivity should be high and visual dominance should be dominant for site GUE-3 since a significant number of redwoods and valley oak would be removed for development. The commenter states Figure 4.1-5 of the DEIR is misleading since additional photos should show the immense valley view beauty which determines the visual character of Guerneville.

Refer to Response 198.7.

Response 249.8

The commenter states that rezoning of sites GUE-2 through 4 are inconsistent with the goals and policies of the County General Plan, Bay Area 2050, and the Housing Element.

Refer to Response 198.8.

Response 249.9

The commenter expresses discontent for the lack of notification and inclusion in the early processes of the Housing Element Update and expresses her opposition to rezoning sites GUE-2 through 4.

Refer to Response 198.9.

EIR Public Comment 250

COMMENTER: Bob and Robin Shopbell

DATE: February 13, 2023

Response 250.1

The commenter comments on site FOR-4, and expresses dissatisfaction with inclusion of FOR-4.

Please refer to Master Response HE regarding opposition to the Housing Element.

Response 250.2

The commenter states that maps identifying and describing site FOR-4 are incorrect. The commenter expresses the opinion that Van Keppel is a single egress road, and adding more than 70 units would result in significant evacuation impacts.

Refer to Response 131.1 regarding the address of 6090 Van Keppel, which has been corrected in the EIR; the figures in the Draft EIR are correct. Please refer to Master Response EMG regarding emergency access and evacuation.

Response 250.3

The commenter states that current residents are using septic on the 6000 block of Van Keppel, and sanitary systems would be required to be updated to accommodate the increase in more than 70 units.

Please refer to Master Response UTIL regarding impacts to utility infrastructure and Appendix WSS. Existing sewer infrastructure is shown in Table 4-1, and FOR-4 is listed as having adjacent sewer pipe based on information from the general manager of Forestville Water District.

Response 250.4

The commenter expresses opposition to rezoning site FOR-4 since there are inadequate public sewer systems and the proposed units would be inconsistent with the character and style of the neighborhood.

Please refer to Master Response HE regarding opposition to the Housing Element and Master Response UTIL regarding impacts to utility infrastructure. Potential impacts to aesthetics are discussed in Section 4.1, *Aesthetics,* which concludes that development facilitated by the project on Rezoning Sites would have significant and unavoidable impacts even with the incorporation of Mitigation Measure AES-1 (refer to Impact AES-3). In terms of neighborhood character, social effects of a project shall not be treated as a significant effect on the environment pursuant to *CEQA Guidelines* Section 15131. As such, formal analysis of social impacts is not required, which includes neighborhood character or fiscal impacts.

EIR Public Comment 251

COMMENTER: Sabrina Zola

DATE: February 13, 2023

Response 252.1

The commenter expresses opposition to rezoning six parcels in Forestville since it would result in substantial impacts to traffic, evacuation, infrastructure such as sewer and water, pedestrian safety, and wildlife.

Please refer to Master Response HE regarding opposition the Housing Element, Master Response TRA regarding traffic impacts, and Master Response EXST regarding existing issues in Forestville. Refer to Master Response EMG regarding emergency evacuation Potential impacts to evacuation, sewer and water services, pedestrian safety, and wildlife are discussed in the following sections of the Draft EIR, respectively: Section 4.19, *Wildfire;* Section 4.18, *Utilities and Service Systems;* Section 4.16*, Transportation;* and Section 4.4, *Biological Resources.* As discussed therein, the proposed project would not substantially impair an adopted emergency response or evacuation plan, or substantially increase hazards due to design features or incompatible uses, or result in significant impacts to wildlife. However, refer to Master Response UTIL regarding infrastructure impacts of the project.

EIR Public Comment 252

COMMENTER: Scott Ruthrauff

DATE: February 13, 2023

Response 252.1

The commenter expresses the opinion that the parcels and infrastructure in Forestville are incapable of accommodating an additional 1,652 new residents.

Please refer to Master Response EXST regarding existing infrastructure and Master Response UTIL regarding impacts of the proposed project on water and wastewater infrastructure.

Response 252.2

The commenter expresses the opinion that increasing the Forestville population by 1,625 new residents is increasing the population by 50 percent, and there is already limited space with only one single road in and out of the town. The commenter states that even if the proposed projects resulted in improved services, the roadways would not be able to handle additional traffic, especially during evacuations.

The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter. Please refer to Master Response EXST regarding existing infrastructure, Master Response TRA regarding traffic congestion, and Master Response EMG regarding emergency access and evacuation.

Response 252.3

The commenter expresses the opinion that the proposed number of new residents should be reduced to 600 with a total of 150 homes. The commenter recommends placing new housing in proximity to transit, services, and existing infrastructure such as Santa Rosa, Rohnert Park, Windsor, and Petaluma.

Please refer to Master Response SITE regarding the site selection process. This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, Sebastopol and Windsor, have their own ABAG-assigned RHNA and housing elements.

EIR Public Comment 253

COMMENTER: Soichiro Takahashi

DATE: February 12, 2023

Response 253.1

The commenter expresses opposition towards high density housing in downtown Forestville since it is inconsistent with the small and intimate character of the town. The commenter states that police stations, traffic lights, larger roads, markets, and a hospital would be required to support the proposed population growth.

Please refer to Master Response HE regarding opposition to the Housing Element and Master Response EXST regarding existing conditions. Impacts to public services, including police stations, are analyzed in Section 4.15, *Public Services and Recreation,* of the Draft EIR, which concludes that development facilitated by the project on Rezoning Sites would not result in substantial adverse physical impacts associated with the construction of new or physically altered police facilities. Additionally, pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes existing markets and hospitals.

Response 253.2

The commenter expresses the opinion that housing should be concentrated in areas with existing employment, transit, services, and infrastructure such as downtown Santa Rosa, and not Forestville.

The proposed project would involve rezoning sites to facilitate implementation of Sonoma County's Housing Element. Sonoma County does not have authority to rezone parcels within Santa Rosa or other cities within the county as they are separate jurisdictions. Additionally, the EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, Sebastopol and Windsor, have their own ABAG-assigned RHNA and housing elements.

EIR Public Comment 254

COMMENTER: Steve and Andrea Perry

DATE: February 13, 2023

Response 254.1

The commenter states that the rezoning of parcels APN 054-290-057 and APN 054-290-084 in Glen Ellen should be removed from the proposed Housing Element Update.

Please refer to Master Response HE regarding opposition to the Housing Element.

Response 254.2

The commenter states that the proposed rezoning would increase density by more than 300 percent, which would change the community's character and impact the limited downtown center.

Pursuant to *CEQA Guidelines* Section 15131, social or economic effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of social or economic impacts is not required, including the community's character and downtown businesses.

Response 254.3

The commenter states that the increase in vehicles would worsen Glen Ellen's parking issue. The character expresses the opinion that the DEIR does not adequately address impacts to increased density and resulting traffic issues.

Parking is not considered an environmental impact and is not required to be analyzed under CEQA. Refer to Response 70.6 regarding the Sonoma Developmental Center.

Response 254.4

The commenter refers to the General Plan and Glen Ellen Design and Development Guidelines and reiterates that the rezoning of parcels APN 054-290-057 and APN 054-290-084 in Glen Ellen should be removed from the proposed Housing Element Update.

Refer to Response 70.3 and Response 136.4 regarding the Glen Ellen Design and Development Guidelines and Sonoma County General Plan. Please refer to Master Response HE regarding opposition to the Housing Element.

EIR Public Comment 255

COMMENTER: Susan Mulcahy

DATE: February 13, 2023

Response 255.1

The commenter expresses opposition to rezoning sites GLE-1 and GLE-2 since it is inconsistent with County guidelines and is an inappropriate use of the sites. The commenter states that bus service is minimal and stores are inadequate to accommodate an increase in population. The commenter states that the project does not take into account other proposed project such as the SDC, Hanna Boys Center, and Elnoka.

Refer to Master Response HE regarding opposition to the project. Refer to Table 4.11-2 for an in-depth discussion regarding the project's consistency with the County General Plan. Refer to Master Response EXST regarding existing bus service and stores. Refer to Response 70.6 regarding cumulative development including in regard to the Sonoma Developmental Center, Hannah Boys Center, and Elnoka developments.

EIR Public Comment 256

COMMENTER: Susan Ziegler

DATE: February 13, 2023

Response 256.1

The commenter expresses confusion at what the project entails and asks what types of units would be built, whether they would be owner-occupied or rental, and what the terms of ownership are. The commenter also asks whether all properties would be developed.

The proposed project would not facilitate the construction of specific types of development. Rather, the proposed project would rezone the 59 identified sites to allow for a greater number of dwelling units than allowed under existing zoning. Please refer to Table 2-3 for the maximum number of dwelling units allowed per acre on each site, and Table 2-4 for the total number of dwelling units allowed on each site. It is unlikely that every site would be developed and that every site would be developed at its maximum buildout potential.

Response 256.2

The commenter states that the DEIR lists an approximate population increase of 616 residents from sites GUE-1 through 4, but doesn't list proposed population for sites GUE-5 and GUE-6. The commenter asks what the acreage of sites GUE-5 and GUE-6 are, and whether all six sites would be used.

Table 2-2 of the EIR shows all sites on the housing element inventory. The 59 sites on the inventory proposed for rezoning are shown in Table 2-4 of the EIR. GUE-5 and GUE-6 are not proposed for rezoning as they are already zoned for residential development.

Response 256.3

The commenter expresses concerns regarding car exhaust impacts resulting from the increase in vehicles and delivery trucks. The commenter expresses the opinion that Laughlin Road and Watson Valley Lane which lead to sites GUE-1 through 3 have no sidewalks and are narrow with areas allowing for only one-way traffic.

Refer to Master Response TRA regarding traffic congestion and Master Response EXST regarding existing roadway conditions.

Please refer to Section 4.3, *Air Quality,* of the Draft EIR. As discussed therein, project construction would temporarily increase air pollutant emissions and impacts would be potentially significant (page 4.3-16 of the Draft EIR). The project would include implementation of Mitigation Measures AQ-1, Basic Construction Mitigation Measures, and AQ-2, Additional Construction Mitigation Measures (page 4.3-19 of the Draft EIR). Additionally, development facilitated by the project on Rezoning Sites would not expose sensitive receptors to substantial pollutant concentrations from carbon monoxide hotspots or toxic air contaminants (page 4.3-21 of the Draft EIR).

Please refer to Master Response EMG regarding emergency access. Additionally, refer to Section 4.16, *Transportation.* As discussed therein, development facilitated by the proposed project on Rezoning Sites

would be required to provide, safe, continuous, and convenient pedestrian access (page 4.16-14 of the Draft EIR).

Response 256.4

The commenter asks whether community input would be included and how they can get more information and questions answered about the proposed project.

Public comments on the Draft EIR were received for a 55-day comment period until February 23, 2023, as described in Section 1, *Introduction*, above. Additional information regarding the Housing Element process is available on the County's Housing Element Update website: https://permitsonoma.org/longrangeplans/proposedlong-rangeplans/housingelement

EIR Public Comment 257

COMMENTER: Suzi Molofsky

DATE: February 13, 2023

Response 257.1

The commenter expresses opposition to rezoning sites GLE-1 and GLE-2.

Please refer to Master Response HE regarding opposition to the project. The commenter's opposition to rezoning sites in Glen Ellen is noted and will be passed on to decision-makers.

Response 257.2

The commenter expresses an opinion that the proposed rezoning would result in traffic congestion and would be inconsistent with the General Plan and Glen Ellen Development Guidelines. The commenter states that the rezoning would be out of scale with the character and infrastructure of Glen Ellen. The commenter states that new housing is already addressed by the increase in ADUs as well as the development of the Sonoma Developmental Center and the Hannah Boys Center. The commenter states that current residents have to travel outside of Glen Ellen to shop.

Please refer to Master Response TRA regarding traffic impacts. Additionally, refer to Table 4.11-3 in Section 4.11, *Land Use* and *Planning,* which outlines the project's consistency with the Sonoma County General Plan, and Section 4.1, *Aesthetics,* which concludes that development facilitated by the proposed project on Rezoning Sites would not significantly affect public views and community and aesthetic character with implementation of mitigation measures (page 4.1-59 of the Draft EIR). Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes retail services. Refer to Response 70.6 regarding the Sonoma Developmental Center and Hannah Boys project. Refer to Response 70.3 regarding the Glen Ellen Development Guidelines.

EIR Public Comment 258

COMMENTER: Tamara Sarkissian

DATE: February 13, 2023

Response 258.1

The commenter expresses the opinion that increasing the size of Forestville by 50 percent would result in substantial impacts to traffic, safety, and quality of life. The commenter states that Forestville has a lack of infrastructure to accommodate the growth, and has limited access to public transportation, limited sewer and water capacity, no police force, and no high school.

Please refer to Response 188.1.

Response 258.2

The commenter comments on the rezoning of site FOR-2, and asks how traffic safety would be facilitated for the additional 736 cars entering Mirabel Road, Highway 116, and River Road.

Please refer to Response 188.2.

Response 258.3

The commenter states that Mirabel Road only has a sidewalk on one side of the street heading towards downtown, and expresses her concerns regarding pedestrian safety.

Please refer to Response 188.3.

Response 258.4

The commenter states that public transportation is limited and infrequent in Forestville, and asks how pedestrian safety while walking to bus stops would be ensured given the lack of sidewalks.

Please refer to Response 188.4.

Response 258.5

The commenter asks how public transportation from Forestville to Santa Rosa and throughout the Russian River would be improved.

Please refer to Response 188.5.

Response 258.6

The commenter asks how the local elementary school would be improved to ensure that teachers could accommodate the influx in children.

Please refer to Response 188.6.

Response 258.7

The commenter expresses the opinion that the local sewer and water systems would require upgrades to handle the increase in residents, and asks what upgrades would be included to accommodate 283 new units.

Please refer to Response 188.7.

Response 258.8

The commenter expresses the opinion that Forestville does not have a police station, and asks how extra policing would be received for an additional 736 residents.

Please refer to Response 188.8.

Response 258.9

The commenter asks how appropriate access to medical and social services would be improved to accommodate increased numbers of residents.

Please refer to Response 188.9.

Response 258.10

The commenter expresses her discontent that housing would increase the Forestville population by 50 percent.

Please refer to Response 188.10.

EIR Public Comment 259

COMMENTER: Tamara Sarkissian

DATE: February 13, 2023

Response 259.1

The commenter expresses the opinion that increasing the size of Forestville by 50 percent would result in substantial impacts to traffic, safety, and quality of life. The commenter states that Forestville has a lack of infrastructure to accommodate the growth, and has limited access to public transportation, limited sewer and water capacity, no police force, and no high school. The commenter comments on the rezoning of site FOR-4, and states that Van Keppel is a narrow one-lane road that could barely accommodate the current flow of traffic. The commenter asks how the road would be made safe for an additional 185 vehicles. The commenter expresses the opinion that Highway 116 is a busy thoroughfare, and asks how a safe flow of traffic for an additional 185 vehicles would be facilitated. The commenter states that Van Keppel is a narrow road with no sidewalk, and asks how pedestrian safety would be ensured. The commenter states that public transportation is limited and infrequent in Forestville, and asks how pedestrian safety while walking to bus stops would be ensured given the lack of sidewalks. The commenter asks how public transportation from Forestville to Santa Rosa and throughout the Russian River would be improved. The commenter asks how the local elementary school would be improved to ensure that teachers could accommodate the influx in children. The commenter expresses the opinion that the local sewer and water systems would require upgrades to handle the increase in residents, and asks what upgrades would be included to accommodate 71 new units. The commenter expresses the opinion that Forestville does not have a police station, and asks how extra policing would be received for an additional 185 residents. The commenter asks how appropriate access to medical and social services would be improved to accommodate increased numbers of residents. The commenter expresses discontent that housing would increase the Forestville population by 50 percent.

This letter is identical to Comment 258. Refer to Responses 258.1 through 258.10

EIR Public Comment 260

COMMENTER: Tamara Sarkissian

DATE: February 13, 2023

Response 260.1

The commenter expresses the opinion that increasing the size of Forestville by 50 percent would result in substantial impacts to traffic, safety, and quality of life. The commenter states that Forestville has a lack of infrastructure to accommodate the growth, and has limited access to public transportation, limited sewer and water capacity, no police force, and no high school. The commenter comments on the rezoning of site FOR-4, and states that Van Keppel is a narrow one-lane road that could barely accommodate the current flow of traffic. The commenter asks how the road would be made safe for an additional 185 vehicles. The commenter expresses the opinion that Highway 116 is a busy thoroughfare, and asks how a safe flow of traffic for an additional 185 vehicles would be facilitated. The commenter states that Van Keppel is a narrow road with no sidewalk, and asks how pedestrian safety would be ensured. The commenter states that public transportation is limited and infrequent in Forestville, and asks how pedestrian safety while walking to bus stops would be ensured given the lack of sidewalks. The commenter asks how public transportation from Forestville to Santa Rosa and throughout the Russian River would be improved. The commenter asks how the local elementary school would be improved to ensure that teachers could accommodate the influx in children. The commenter expresses the opinion that the local sewer and water systems would require upgrades to handle the increase in residents, and asks what upgrades would be included to accommodate 71 new units. The commenter expresses the opinion that Forestville does not have a police station, and asks how extra policing would be received for an additional 185 residents. The commenter asks how appropriate access to medical and social services would be improved to accommodate increased numbers of residents. The commenter expresses discontent that housing would increase the Forestville population by 50 percent.

This letter is identical to Comment 258. Refer to Responses 258.1 through 258.10

EIR Public Comment 261

COMMENTER: Tamara Sarkissian

DATE: February 13, 2023

Response 261.1

The commenter expresses the opinion that increasing the size of Forestville by 50 percent would result in substantial impacts to traffic, safety, and quality of life. The commenter states that Forestville has a lack of infrastructure to accommodate the growth, and has limited access to public transportation, limited sewer and water capacity, no police force, and no high school. The commenter comments on the rezoning of site FOR-4, and states that Van Keppel is a narrow one-lane road that could barely accommodate the current flow of traffic. The commenter asks how the road would be made safe for an additional 185 vehicles. The commenter expresses the opinion that Highway 116 is a busy thoroughfare, and asks how a safe flow of traffic for an additional 185 vehicles would be facilitated. The commenter states that Van Keppel is a narrow road with no sidewalk, and asks how pedestrian safety would be ensured. The commenter states that public transportation is limited and infrequent in Forestville, and asks how pedestrian safety while walking to bus stops would be ensured given the lack of sidewalks. The commenter asks how public transportation from Forestville to Santa Rosa and throughout the Russian River would be improved. The commenter asks how the local elementary school would be improved to ensure that teachers could accommodate the influx in children. The commenter expresses the opinion that the local sewer and water systems would require upgrades to handle the increase in residents, and asks what upgrades would be included to accommodate 71 new units. The commenter expresses the opinion that Forestville does not have a police station, and asks how extra policing would be received for an additional 185 residents. The commenter asks how appropriate access to medical and social services would be improved to accommodate increased numbers of residents. The commenter expresses discontent that housing would increase the Forestville population by 50 percent.

This letter is identical to Comment 258. Refer to Responses 258.1 through 258.10.

EIR Public Comment 262

COMMENTER: Tim and Kathy Dellinger

DATE: February 13, 2023

Response 262.1

The commenters express their opposition to the rezoning of parcels in Forestville and comments on the DEIR's analysis and alternatives specifically regarding Forestville.

This comment does not pertain to analysis in the Draft EIR. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 262.2

The commenters express their confusion on how the sites were chosen and ask which parties were responsible for selecting the sites and what methodology was used. The commenters also ask what input Forestville had in the process.

Please refer to Master Response SITE regarding the site selection process.

Response 262.3

The commenters ask if the County of Sonoma would make the final decision regarding the selection and the use of sites, and whether Forestville citizens and officials would be able to give their input.

This comment does not pertain to the adequacy of analysis within the Draft EIR. However, the commenter is correct that, as stated in the EIR, the Sonoma County Board of Supervisors has the authority to remove sites from the Housing Element.

Response 262.4

The commenters refer to Table 2-4 of the DEIR and state that sites FOR-2 and FOR-3 are omitted under Alternative 3. The commenters ask if the total allowable dwelling units would remain at the current designation of 7 and 3, respectively.

Alternative 3, Fewer Potential Sites, is discussed starting on page 6-12. As shown in Section 6.3.1, *Description,* Alternative 3 would omit sites FOR-1 and FOR-2. Under this alternative, sites FOR-1 and FOR-2 would not be rezoned and the total allowable dwelling units under current designations for the site would not change.

Response 262.5

The commenters express the opinion that Forestville is a small village with low density housing and residents choose to live there due to a slower pace and peacefulness. The commenters state that Forestville is mostly quiet with the exception of occasional daytime noise from a nearby stone quarry and transporting trucks.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers. Refer to Master Response EXST regarding existing conditions.

Response 262.6

The commenters express the opinion that the addition of 1,625 new residents would result in major changes to the current way of life in Forestville since nearly half of the new residents would be added to a 14-acre landlocked site (FOR-2). The commenters state that the multi-story structures would be inconsistent with the single-story homes on the perimeter of the FOR-2 site, and express the opinion that the DEIR incorrectly minimizes the impact of the aesthetic change.

Refer to Master Response EXST regarding the existing conditions of Forestville. The commenter does not specifically refer to which part of the aesthetics analysis minimizes potential impacts, and the EIR finds a significant and unavoidable aesthetic impact to FOR-2 under Impact AES-3 in Section 4.1, *Aesthetics*. Please note that the proposed project would not require identified parcels to be developed and that the project would not include construction.

Response 262.7

The commenters state that part of the road traffic on Nolan Road, Mirabel Road, and Giusti Road is foot traffic, and that there are no sidewalks on either side of these roads. The commenters state that the DEIR does not mention the absence of sidewalks, and express their concern regarding pedestrian safety, asking how children of the FOR-2 site would be able to safely cross Mirabel Road which includes heavy traffic. The commenters express their opinion that most people travel outside of Forestville for employment, and new residents should not be added to the area with few jobs to support them.

The commenter is incorrect that the Draft EIR does not mention the absence of sidewalks; refer to the pedestrian facilities setting section on page 4.16-8. As discussed elsewhere in Section 4.16, *Transportation*, development facilitated by the proposed project on Rezoning Sites would be required to provide, safe, continuous, and convenient pedestrian access (page 4.16-14 of the Draft EIR). Additionally, as discussed under Impact TRA-2 (page 4.16-17 of the Draft EIR), development facilitated by the proposed project on Rezoning Sites would not substantially increase hazards due to sharp curves, dangerous intersections, or other design features.

Response 262.8

The commenters state that the town center has a small retail and personal service businesses, and although there is congestion due to the lack of parking it is currently tolerable. The commenters state that the increase in residents would result in an increase in traffic through the town center, which the Fehr and Peers Transportation Study underestimated, since there is no traffic signaling or road configuration that slows the traffic entering the town center and traffic also includes large trucks from the nearby quarry and from grape vineyards during harvest season.

Refer to Master Response TRA regarding traffic congestion. Appendix TRA includes a congestion-based analysis for informational purposes only, and not for purposes of CEQA. Refer to Section 4.16, *Transportation*, for the VMT-based transportation analysis.

EIR Public Comment 263

COMMENTER: Tony Barber

DATE: February 13, 2023

Response 263.1

The commenter expresses support for the majority of housing sites, but opposes the rezoning of the Cutten property.

This comment is noted and passed on to decision-makers for consideration. Please refer to Master Response SITE regarding the site selection process.

Response 263.2

The commenter states that the DEIR lacks specific analyses and recommendations and requests the removal of sites GUE-1 through 3 from the Housing Element Update.

This comment is noted and passed on to decision-makers for consideration. Please refer to Master Response SITE regarding the site selection process and Master Response HE regarding opposition to specific Rezoning Sites.

Response 263.3

The commenter expresses the opinion that housing should be commercially viable, close to services, include appropriate infrastructure, in proximity to safe transportation, and does not include negative impacts to the environment or residents. The commenter states that the Cutten site is not likely to be developed.

This comment is noted and passed on to decision-makers for consideration. Please refer to Master Response SITE regarding the site selection process and Master Response HE regarding opposition to specific Rezoning Sites. Please refer to Response EXST regarding existing conditions and services. Potential environmental impacts are described and discussed through Section 4 of the Draft EIR, and mitigation measures are included to reduce potential impacts where feasible.

Response 263.4

The commenter states that the site is 1.4 miles from Guerneville and residents would be dependent on cars. The commenter states that the increase in traffic and lack of parking would result in negative impacts.

The Guerneville Rezoning Sites are all located within the designated Urban Service Area associated with Guerneville (please refer to Figure 2-4 on page 2-12 of the Draft EIR). Please refer to Master Response EXST regarding existing conditions, including that of road infrastructure. Please refer to Master Response TRA regarding traffic congestion. Refer to Master Response UTIL regarding water and sewer infrastructure. Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

Response 263.5

The commenter expresses the opinion that other sites along Armstrong Woods and in downtown Guerneville are better options for housing sites.

Please refer to Master Response SITE regarding the site selection process, and criteria that selected sites needed to meet.

Response 263.6

The commenter states that the Cutten site would require road widening and sidewalk construction, which would lower the financial viability of investment at that site.

Specific road widening locations have not been identified, it would be speculative to analyze potential impacts at this time. However, if it is determined that road widening is needed to access Rezoning Sites for future development, road widening would require site-specific CEQA compliance that could include additional mitigation measures.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes the financial viability of construction.

Response 263.7

The commenter asks why the buildout potential and zoning for the Cutten property was increased from 21 units as listed in the 2014 Housing Element (Site 11) to 33 units as listed in Table 2-4 of the DEIR. The commenter states that there are many other larger and vacant sites closer to services and infrastructure.

Please refer to Master Response SITE regarding the site selection process. References to previous proposal for development on the Rezoning Sites are not relevant to the proposed project or analysis provided in the EIR. The commentor's opposition to the proposed rezoning to R2 is noted and passed on to decision-makers for consideration.

Response 263.8

The commenter states that sites GUE-2 and GUE-3 are only accessible via one-lane roads and would require utility upgrades. The commenter states that upgrades and road closures would severely impact the emergency egress for residents. The commenter states that the redwood tree on Laughlin Road would be required to be removed to widen the road. The commenter states that road work on Cutten Drive and Laughlin Road must be addressed before construction activities.

Please refer to Response 263.6 regarding road improvements and Master Response EXST regarding existing conditions. Potential impacts related to road closures during construction are discussed in Impact TRA-1, beginning on page 4.16-14 of the Draft EIR. As noted therein, the implementation of Mitigation Measure TRA-2, which requires a construction traffic management plan, would reduce potential impacts associated with traffic disruptions during construction to less than significant.

Potential impacts related to tree removal are discussed under Impact BIO-5, beginning on page 4.4-39 of the Draft EIR. As stated therein:

> Trees to be removed have not yet been identified because individual projects have not been developed yet… Development facilitated by the project on Rezoning Sites would be required to comply with these goals policies and measures, including via the application for tree removal permits and compliance with associated requirement (e.g., tree replacement) where applicable.

Response 263.9

The commenter expresses concerns regarding pedestrian safety since there are no sidewalks or bicycle lanes in Guerneville.

Potential impacts related to pedestrian and bicycle facilities are discussed under Impact TRA-1, beginning on page 4.16-14 of the Draft EIR. Potential impacts related to traffic safety are discussed under Impact TRA-2, on page 4.16-18 of the Draft EIR. Please refer to Master Response EXST regarding existing conditions, including existing pedestrian and bicycle infrastructure.

Response 263.10

The commenter states that the DEIR incorrectly lists distances from services and does not mention that Guerneville is not a walkable area or that the one-lane road leading up to Cutten Drive could not be expanded due to geography and is prone to slides. The commenter states that the DEIR is inconsistent with Goal 3 of the Housing Element Update.

The commenter does not provide specifics of which distances are incorrectly stated in the Draft EIR; therefore, it is unclear if revisions are needed. No further response is warranted.

Please refer to Master Response SITE regarding site selection criteria. As noted therein, being located in a "walkable area" is not a criterion. Please refer to Response 263.6 regarding road improvements.

Landslide potential is discussed in Section 4.7, *Geology and Soils* of the Draft EIR.

Consistency with Goal 3 is addressed on page 4.11-39 of the Draft EIR. As determined therein, the project would be consistent with this goal.

Response 263.11

The commenter states that the DEIR does not address public safety or insufficient roadways of the Cutten site and does not provide mitigation measures.

Please refer to Master Response SITE regarding the site selection process. Please refer to Master Response EXST regarding existing road infrastructure and Response 263.6 regarding road improvements.

Response 263.12

The commenter claims that the DEIR does not address public transit or pedestrian sidewalks, which is inconsistent with Goal 6 of the Housing Element Update. The commenter states that there are no sidewalks at the Cutten site, bus service is more than 0.4 miles away, and the area is not well lit. The commenter refers to the "Pedestrian Facilities" section of page 4.16-8 of the DEIR, and expresses the opinion that the DEIR does not mention system gaps for the Cutten site or the Laughlin site. The commenter asserts that it is geographically impossible to construct sidewalks on the Cutten site, and the site is inappropriate for increasing density.

Housing Element Goal 6: Encourage Equitable and Sustainable Housing is not relevant to the analysis provided in the EIR. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes equity.

Please refer to Master Response EXST regarding existing conditions and infrastructure. The Draft EIR is not required to mitigate existing conditions or deficiencies.

Existing transit access, bicycle conditions, and pedestrian facilities are described beginning on page 4.16-5 of the Draft EIR. Potential impacts to these facilities are described in Impact TRA-1, beginning on page 4.16-14 of the Draft EIR. As noted therein:

> …in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks.

Response 263.13

The commenter refers to "Pedestrian Facilities" on page 4.16-15 of the DEIR, and claims that the DEIR does not mitigate any of the impacts listed. The commenter states that the significant and unavoidable determination for Impact TRA-1 shows that there is no plan to address sidewalks or roadways for the Cutten site and requests for the site to be removed from the housing inventory.

The commenter is incorrect. The Draft EIR provides a conclusion of a less than significant for impacts to pedestrian facilities, as stated in the quoted text included in this comment. The significant and unavoidable conclusion is related to VMT impacts, and not pedestrian facility impacts.

Response 263.14

The commenter refers to Table 5-2 of the DEIR appendix, and states that with an approximation of 134.77 gpd per resident and an estimated 42 residents on the Cutten site, sewer usage would increase from the current 5,660 gpd to over 20,000 gpd due to the 500 percent increase in population. The commenter states that the DEIR does not analyze water and sewer infrastructure at the Cutten site.

Please refer to Master Response UTIL regarding water and wastewater impacts.

Table 5-2 of Appendix WSS provides a summary of water demand increases in each Urban Service Area. The Guerneville sites would result in a total increase of 93.2 acre-feet per year in water demand. It is unclear where the commenter's figure of 134.77 GPD per resident is sourced from.

Wastewater generation on the Guerneville sites is provided in Table 5-3 of Appendix WSS. As shown therein, the increase in average sewer generation would result in 32,139 GPD of wastewater. It is again unclear where the commenters figures of 5,660 GPD and 20,000 GPD are sourced from.

The calculations provided in Appendix WSS informed the analysis provided in the Draft EIR, including Impact UTIL-1, beginning on page 4.18-12, which describes potential impacts to water and wastewater services. Mitigation is required as necessary, for sites that are not located adjacent to existing water and wastewater infrastructure.

Response 263.15

The commenter refers to Table 4.19-1 of the DEIR, which shows that the Cutten site has a slope of 50 to 75 percent. The commenter states that the DEIR does not analyze sloping on the Cutten site or provide mitigation.

CEQA does not require an analysis of slope as it relates to development costs. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes the cost of construction.

Slopes as they pertain to landslides are addressed in Section 4.7 of the Draft EIR. Slopes as they pertain to wildfire are addressed in Section 4.19 of the Draft EIR.

Response 263.16

The commenter refers to the Cultural Resources section of the DEIR and states that the DEIR does not list mitigation or analyze the likelihood that the property would be sold which would impact the viability of the site, given that the family at the Cutten property has lived there for over 100 years.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes existing property owner intentions.

Site GUE-3 is acknowledged as containing a potentially historic structure, as noted in Table 4.5-1 on page 4.5-5 of the Draft EIR. Please refer to Impact CUL-1 regarding potential impacts to historical resources, beginning on page 4.5-11 of the Draft EIR.

Response 263.17

The commenter states that sites GUE-2 through 4 are located in a flood plain zone, high wildfire danger zone, and seismic zone. The commenter expresses the opinion that building in flood and high fire zones is contradictory to the County General Plan for safety reasons.

Potential impacts related to flooding, wildfire, and seismic events are addressed in Sections 4.9, 4.19, and 4.7 of the Draft EIR, respectively. Please refer to Master Response EMG regarding emergency evacuation.

Response 263.18

The commenter states that the closest hospitals are at least 30 minutes away and ambulance and emergency services are inadequate. The commenter asserts that low-income residents would be elderly.

Please refer to Master Response EMG regarding emergency access. Please refer to Section 4.15, *Public Services and Recreation*, regarding potential impacts to emergency medical services.

The commenter's speculation on the demographics of future residents is not related to the EIR and does not warrant a response.

Response 263.19

The commenter expresses the opinion that the amount of law enforcement and emergency response would be required to be increased to accommodate the increase in residents.

Please refer to Section 4.15, *Public Services and Recreation*, regarding potential impacts to police services (Impact PS-2) and emergency medical services (Impact PS-1). As noted therein, impacts would be less than significant.

Response 263.20

The commenter expresses the opinion that site GUE-3 would result in significant biological resource impacts since it would require the removal of redwoods, and remove meadow habitat for California Quail, California Grey Foxes, and Osprey.

Refer to Response 198.7.

Response 263.21

The commenter states that site GUE-3 is also located adjacent to agricultural uses, and Mitigation Measure AG-1 would require an agricultural protection buffer for future development.

The commenter is correct that any Rezoning Sites located adjacent to active agricultural operations would be required to implement Mitigation Measure AG-1.

Response 263.22

The commenter states that site sensitivity should be high and visual dominance should be dominant for site GUE-3 since a significant number of redwoods and valley oak would be removed for development.

Refer to Response 198.8.

Response 263.23

The commenter states Figure 4.1-5 of the DEIR is misleading since additional photos should show the immense valley view beauty which determines the visual character of Guerneville.

The commenter's opinion is noted; however, Figure 4.1-5 is intended to provide views of GUE-2 and GUE-3 that is experienced by travelers on Cutten Road, and not views experienced by residents or visitors on GUE-2 or GUE-3.

Response 263.24

The commenter expresses the opinion that Figure 4.1-5 of the DEIR undermines the actual assessment of dominance in the area, and that the DEIR is missing a more in-depth and local view of the area.

The images provided in the Draft EIR are not exhaustive of the analysis conducted in the Draft EIR. Additionally, Figure 4.1-5 does provide a perspective of a clearly visible redwood tree. Redwood trees are prevalent in the area, and not located exclusively on GUE-3. Therefore, as described in Response 263.22, the EIR correctly characterizes GUE-3 as being co-dominant.

Please refer to Impact BIO-5, beginning on page 4.4-39 of the Draft EIR, regarding potential impacts associated with tree removal. As noted therein, compliance with County-required policies related to

heritage trees and tree removal (which apply to all projects in the County, regardless of CEQA requirements) was determined to be adequate to reduce impacts to less than significant.

Response 263.25

The commenter expresses the opinion that there is not enough time to comment on the entire document given the size and technicalities. The commenter recommends planning officials to reconsider some of the sites.

The commenter's opinion is noted and passed on to decision-makers for consideration. Please refer to Response 120.2 regarding the public comment period.

Response 263.26

The commenter states that rezoning of sites GUE-2 through 4 are inconsistent with the goals and policies of the County General Plan, Bay Area 2050, and the Housing Element.

Please refer to Impact LU-2, beginning on page 4.11-30 of the Draft EIR, for an analysis of consistency with the County General Plan, Plan Bay Area 2050, and County Housing Element.

Response 263.27

The commenter expresses the opinion that a deeper review of the DEIR and Housing Element Update would underscore the need to remove certain sites.

The commenter's opinion is noted and passed on to decision-makers for consideration. Please refer to Master Response HE regarding opposition to certain Rezoning Sites.

EIR Public Comment 264

COMMENTER: Vikki Miller

DATE: February 13, 2023

Response 264.1

The commenter expresses the opinion that Forestville has a need for workforce housing, and of the proposed sites, sites FOR-3 and FOR-6 are most suitable for the development of housing.

This comment does not pertain to the adequacy of analysis in the Draft EIR. This comment has been passed on to County decision-makers.

Response 264.2

The commenter states that sites FOR-1, FOR-5, and FOR-6 are located on hazardous materials sites, and would be suitable for housing if they could be safely mitigated.

Please refer to Section 4.9, *Hazards and Hazardous Materials,* of the Draft EIR. As discussed therein, development facilitated by the project on Rezoning Sites would be subject to existing applicable regulations related to site remediation, compliance with which would minimize impacts from development on contaminated sites (page 4.9-11 of the Draft EIR). As concluded therein, impacts would be less than significant.

Response 264.3

The commenter expresses the opinion that Forestville's limited stores and restaurants would not be able to accommodate an increase in population. The commenter also expresses concern regarding potential greenhouse gas emissions and traffic congestion associated with the project, and that the increase in population facilitated by the project would impair emergency evacuation routes.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, including the capacity of existing stores and restaurants. Please refer to Master Response TRA and Master Response EMG regarding traffic congestion and emergency impacts.

Please refer to Section 4.8, *Greenhouse Gas Emissions*, of the Draft EIR for analysis of fuel consumption and greenhouse gas (GHG) emissions associated with the proposed project. As discussed therein, GHG emissions associated with the proposed project would not exceed the Bay Area Air Quality Management District project-level or plan-level GHG emission thresholds, and the project would be consistent with the goals of the California Air Resources Board 2017 Scoping Plan, the Association of Bay Area Governments' Plan Bay Area 2040, the County's General Plan, and the County's Climate Change Action Resolution. Impacts would be less than significant and no mitigation would be required. Please refer to Section 4.16, Transportation, for analysis of transportation impacts associated with the proposed project. As discussed therein, impacts related to VMT would be significant and unavoidable, and the project would involve implementation of Mitigation Measures TRA-1 and TRA-2 (page 4.16-15 of the Draft EIR). Refer to Master Response TRA regarding traffic congestion, and Master Response EMG regarding evacuation.

Response 264.4

The commenter expresses concerns regarding potential development of site FOR-1 and states that existing hazards should be remediated prior to its development.

Please refer to Response 264.2 and Response O-2.3 regarding the Electro Vector site.

Response 264.5

The commenter expresses her opposition to site FOR-2 due to potential impacts to aesthetics and emergency access.

Please refer to Section 4.1, *Aesthetics,* for analysis of potential impacts to aesthetics. As stated under Impact AES-3, "The project would facilitate development projects at some sites that could introduce incongruous styles and massing or could degrade visual character through the necessary removal of existing, mature trees. New development that is incompatible with the natural and built conditions as they exist could cause a significant impact to the visual quality by changing the visual nature of the site from open space to densely developed residential properties, or by introducing structures with unremarkable design into a neighborhood with a distinctive character informed, in part, by the architecture." FOR-2 would be subject to Mitigation Measure AES-1, but impacts because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects (including FOR-2) on identified sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings. Thus, impacts would remain significant and unavoidable. Please refer to Master Response EMG regarding emergency access.

Response 264.6

The commenter states that sites FOR-3 and FOR-6 are the most promising of the proposed rezone sites due to their proximity to services and public transportation.

This comment does not pertain to the adequacy of analysis with the Draft EIR. This comment has been passed on to County decision-makers.

Response 264.7

The commenter states that the roadway that would provide access to site FOR-4 is narrow and development within the site would impair emergency access.

Please refer to Master Response EMG regarding emergency access.

Response 264.8

The commenter states that site FOR-5 has been previously considered for development as a skate park, and having a non-residential use within the site could provide a barrier to housing built near an existing sewage plant.

This comment does not pertain to adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

Response 264.9

The commenter states that site FOR-6 would be a suitable site as it is proximate to shops and public transportation on Main Street.

This comment does not pertain to adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

Response 264.10

The commenter states that site FOR-7 would be suitable for smaller development, as denser development could cause traffic congestion.

Please note that FOR-7 is not a Rezoning Site. It is analyzed for inclusion in the Housing Element Site Inventory based on its existing zoning. Please refer to Master Response TRA regarding traffic impacts. This comment has been passed on to County decision-makers.

EIR Public Comment 265

COMMENTER: Wayne Weeks

DATE: February 13, 2023

Response 265.1

The commenter identifies themselves as a resident of Guerneville and expresses their opposition to the proposed rezoning sites. The commenter states that the proposed rezoning would allow development that is too large for the area due to the one lane roadway that would provide access to the rezone site.

Please refer to Master Response HE regarding opposition to the Housing Element. Refer to Master Response EXST and Master Response EMG regarding existing conditions and vehicle access.

Response 265.2

The commenter states that the County should have notified property owners of the proposed rezoning.

The County of Sonoma distributed a Notice of Preparation of the Draft EIR and held a public scoping meeting for input on preparation of the Draft EIR, as described in Section 1, *Introduction,* on page 1-4 of the Draft EIR. Public participation efforts undertaken for the Housing Element Update itself are detailed in the Draft Housing Element beginning on page 2 under Section 1.4, *Public Participation.* Refer to Master Response Site regarding notification of property owners.

EIR Public Comment 266

COMMENTER: Andy and Renee Tchirkine

DATE: February 14, 2023

Response 266.1

The commenter states that the approach to housing taken in the Housing Element and associated rezoning sets a dangerous precedent for a dictatorship style of government and conflicts with the Constitution. The commenter states that state preemption limits the ability of community to address local issues.

This comment does not pertain to the adequacy of analysis within the Draft EIR and has been passed on to County decision-makers. Please note that the project does not require identified parcels to be developed and that the project does not include buildout or construction of housing allowed by proposed rezoning.

Response 266.2

The commenter asks what right the State of California and the Sonoma County have to implement the proposed rezoning in rural communities with limited services and limited ability to accommodate additional vehicle traffic.

This comment does not pertain to the adequacy of analysis within the Draft EIR and has been passed on to County decision-makers. Please refer to Master Response EXST and Master Response EMG regarding existing conditions and vehicle access.

Response 266.3

The commenter asks why the County has ignored the requirements of CEQA and how future lawsuits can be avoided.

This comment does not pertain to the adequacy of analysis within the Draft EIR and has been passed on to County decision-makers. Refer to Section 1, *Introduction,* of the Draft EIR which outlines the preparation process for an EIR, requirements for the format and content of an EIR as established by the *CEQA Guidelines,* and the adequacy of the Draft EIR.

Response 266.4

The commenter states that a proposed increase in housing must be fair to local communities so that the existing environmental conditions are not disproportionately impacted.

This comment does not pertain to the adequacy of analysis within the Draft EIR and has been passed on to County decision-makers. Please note that the project does not require identified parcels to be developed and that the project does not include buildout or construction of housing allowed by proposed rezoning.

Response 266.5

The commenter asks why there are more proposed rezoning sites in Forestville than in other communities with proposed rezoning sites, and asks how proposed rezoning site allocations amongst Sonoma County communities was determined.

Please refer to Master Response SITE regarding the site selection process.

Response 266.6

The commenter asks why the unincorporated communities of Sebastopol, Windsor, Healdsburg, and Cloverdale do not contain proposed rezoning sites.

Please refer to Master Response SITE regarding the site selection process.

Response 266.7

The commenter states that amenities, including food and medical services, along major corridors must be considered to avoid traffic, accidents, pollution, and parking. The commenter asks why the proposed rezoning sites are not located closer to highway corridors.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes access to food and medical services. Please refer to Master Response TRA regarding traffic congestion, and Master Response EXST regarding existing conditions of roadways. Please refer to Section 3.3 of the Draft Housing Element, which describes the rezoning site selection process beginning on page 68.

Response 266.8

The commenter asks how does the County propose that future occupants of the proposed rezoning sites access services in main urban corridors.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of social impacts is not required, which includes how future site occupants will access services. Please refer to Section 4.16, *Transportation,* of the Draft EIR for analysis of transportation impacts.

Response 266.9

The commenter asks how potential impacts from increased fuel consumption and traffic are mitigated.

Please refer to Response 264.3. Refer also to Master Response TRA regarding traffic congestion.

EIR Public Comment 267

COMMENTER: Anita Das

DATE: February 14, 2023

Response 267.1

The commenter identifies themselves as a resident of Guerneville and states that the proposed rezoning sites in Guerneville would change the character of the neighborhood. The commenter states their opposition to the proposed rezoning.

Please refer to Master Response HE regarding opposition to the Housing Element.

Response 267.2

The commenter states that additional traffic associated with development allowed by the proposed rezoning would cause congestion in Guerneville, and that traffic would have negative impacts to businesses.

Impacts related to transportation are discussed in Section 4.16, *Transportation,* of the Draft EIR. Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion. Additionally, pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes potential impacts to businesses.

Response 267.3

The commenter expresses concern over evacuation routes including the possibility of residents being trapped under trees if they were to fall and the possibility that traffic would force people to evacuate on foot.

Please refer to Master Response EMG regarding emergency services and evacuations.

Response 267.4

The commenter expresses concern over evacuation routes in the event of a flood especially along the Armstrong Woods area. The commenter states that in 2019 the Russian River flooded the Guerneville Area and that adding more people to this area would stretch emergency services.

Please refer to Master Response EMG regarding emergency services and evacuations. Refer also to Master Response EXST regarding existing flood risk.

Response 267.5

The commenter asks if there would be an increase in fire and police personnel proportional to the addition of 588 residents to the Guerneville area.

Please refer to Section 4.15, Public Services and Recreation, in the Draft EIR. As stated therein, while the project would generate additional demand for fire services, it would not substantially reduce existing response times or require the construction of new or altered fire stations and development facilitated by the project on Rezoning Sites would be required to comply with existing regulations regarding fire

safety. Additionally, the increased population would generate a need for 12 additional police officers throughout the county, with no more than three at any one station. The Draft EIR is required to analyze environmental impacts associated with the construction of new police and/or fire facilities, and an additional three officers in any given station throughout the county would not require additional facilities to be built. Therefore impacts to fire and police services would be less than significant.

Response 267.6

The commenter expresses concern over the sewer, water, and electricity infrastructure in the Guerneville Area. The commenter states that the sewer and water system would need to be evaluated, removed, and redone. The commenter states that the area is prone to electrical blackouts and asks if the power grid would be updated as needed.

Please refer to Master Response UTIL regarding water and wastewater infrastructure. Please refer to Section 4.18, Utilities and Service Systems, in the Draft EIR for a discussion of impacts related to electricity. As discussed therein, impacts to electric power would be less than significant.

Response 267.7

The commenter states and opinion that Cutten and Laughlin Roads are not suitable for large numbers of affordable housing and that adding 588 residents would be irresponsible from a health and safety perspective.

This comment is noted and will be passed on to decision-makers.

EIR Public Comment 268

COMMENTER: Caitlin Marigold

DATE: February 14, 2023

Response 268.1

The commenter identifies themselves as a resident of Guerneville and expresses their opposition to the rezoning. The commenter states the streets in Guerneville are too narrow and cannot accommodate additional traffic.

Please refer to Master Response HE regarding opposition to the Housing Element. Refer to Master Response EXST and Master Response EMG regarding existing conditions and vehicle access.

Response 268.2

The commenter states that property owners wish to maintain the low density zoning of their neighborhoods. The commenter states that the streets in Guerneville cannot accommodate additional traffic, and that the area is susceptible to flooding and fire.

Please refer to Master response HE regarding opposition to the Housing Element. Refer to Master Response EXST and Master Response EMG regarding existing conditions and vehicle access. Refer to Response 14.4 for a response regarding existing flooding and fire risk.

Response 268.3

The commenter states that because Guerneville is located in a valley, noise impacts from additional traffic people would impact residents' quality of life. The commenter reiterates their opposition to the proposed rezoning.

Potential noise impacts associated with the rezoning sites are discussed in Section 4.13 of the Draft EIR. As discussed therein starting on page 4.13-5, operational noise impacts associated with the project would be less than significant with implementation of mitigation measures. Please refer to Master response HE regarding opposition to the Housing Element.

EIR Public Comment 269

COMMENTER: Janice Stenger

DATE: February 14, 2023

Response 269.1

The commenter states their comments pertain to proposed rezoning sites along Laughlin Road in Guerneville, as the proposed rezoning would apply to their property (identified by the commenter as 16450 Laughlin [GUE-2]) on Laughlin Road and other properties on Laughlin Road and Cutten Drive.

Based on these details, it is assumed that the commenter is referring to Rezoning Sites GUE-2, GUE-3, and GUE-4. This comment does not pertain to the adequacy of environmental analysis in the Draft EIR.

Response 269.2

The commenter summarizes their opinions regarding taxes, California's management of the COVID-19 pandemic, water issues in California, development trends in California, and farm work and farm worker housing.

This comment does not pertain to the adequacy of environmental analysis in the Draft EIR. This comment is noted but no response is required.

Response 269.3

The commenter expresses concern regarding Guerneville's sewer system.

Please refer to Master Response UTIL for information regarding concerns about the existing sewer system.

Response 269.4

The commenter states that the 59 parcels proposed to be rezoned under the project were suggested by unknown people, and that the County should have facilitated conversations with property owners to share thoughts regarding the proposed project.

Details regarding the site inventory and selection process are provided in Section 2, *Project Description,* starting on page 2-6 of the Draft EIR, and in Master Response SITE.

In terms of public participation in preparation of the Draft EIR, the County of Sonoma distributed a Notice of Preparation of the Draft EIR and held a public scoping meeting for input on preparation of the Draft EIR, as described in Section 1, *Introduction,* on page 1-4 of the Draft EIR. Public participation efforts undertaken for the Housing Element Update itself are detailed in the Draft Housing Element beginning on page 2 under Section 1.4, *Public Participation.*

Response 269.5

The commenter expresses concern regarding existing issues with County roads and concern that many houses in the County have been converted into short-term rental properties, exacerbating the housing crisis.

Please refer to Master Response EXST regarding the existing conditions of services and infrastructure in the County. The number of short-term rental properties is not related to the analysis in the Draft EIR.

Response 269.6

The commenter states that owners of proposed rezone properties were not provided information regarding the Draft EIR process and the Draft EIR is difficult to understand.

The County of Sonoma distributed a Notice of Preparation of the Draft EIR and held a public scoping meeting for input on preparation of the Draft EIR, as described in Section 1, *Introduction,* on page 1-4 of the Draft EIR. Public participation efforts undertaken for the Housing Element Update itself are detailed in the Draft Housing Element beginning on page 2 under Section 1.4, *Public Participation.* The commenter does not specify a section of the EIR for which they require clarification.

Response 269.7

The commenter provides Objective LU-7.1 from the County's General Plan, which would restrict development in areas susceptible to hazards including but not limited fire and geologic hazards, and asks why rezoning sites near Laughlin Road in Guerneville are proposed when such hazards exist.

This comment is similar to Comment 14.4. Please refer to Response 14.4. Refer also to Table 4.11-3, which includes analysis of consistency with Objective LU-7.1. As stated therein, the project is consistent with this policy. Page 4.11-36 reads, "Refer *to* Section 4.7, *Geology and Soils*; Section 4.9, *Hazards and Hazardous Materials*; and Section 4.19, Wildfire, for a discussion of site-specific environmental factors that could create health and safety problems. Refer to Section 4.18, *Utilities and Service Systems*, for a discussion of sewer service to the Rezoning Sites. Refer to Section 4.10, *Hydrology and Water Quality*, regarding development in floodplains; as stated therein, Rezoning Sites GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, and PEN-9 are partially within a 100-year floodplain. Future development on these sites would be required to comply with Policy LU-7c, with site design placing permanent new structures outside of the floodway and raised above the 100-year flood elevation. Refer to Section 4.4, Biological Resources, regarding the presence of wetlands on the Rezoning Sites. Mitigation Measures BIO-15 and BIO-16 require jurisdictional delineations prior to development on Rezoning Sites and avoidance of wetland features or minimization of impacts to wetlands. Refer to Section 4.19, Wildfire, regarding the wildfire risk designation of each Rezoning Site. As stated therein, some of the sites are within Moderate Fire Hazard Severity Zones, and mitigation would be required to reduce impacts."

Response 269.8

The commenter states that the project area is located within State Responsibility Area for fire protection, and that state fire regulations do not allow a single-lane road to serve as an access road.

Please refer to Master Response FIRE and Master Response EMG.

Response 269.8

The commenter provides several policies from the County's General Plan pertaining to development in fire hazard zones.

The commenter does not provide a comment along with the policies.

EIR Public Comment 270

COMMENTER: **Tre Gibbs**

DATE: February 14, 2023

Response 270.1

The commenter expresses concern over the wildfire risk of the proposed rezoning on Laughlin Road (GUE-2 and GUE-4). The commenter states that Laughlin Road is a "narrow dead-end road" that would be a safety hazard in the event of a mandatory wildfire evacuation if the population living on this road increases according to the proposed project.

Please refer to Master Response FIRE regarding wildfire impacts and Master Response EMG regarding emergency evacuation. Please refer to Master Response EXST regarding existing conditions of roadways.

Response 270.2

The commenter expresses concern over flooding. The commenter states that the only road out of Guerneville is Armstrong Woods Road, a two lane road that often floods and that adding almost 600 people to the area would increase the risk of danger due to flooding.

Please refer to Master Response EMG regarding emergency evacuation. Please refer to Master Response EXST regarding existing conditions of roadways. A portion of GUE-4 is acknowledged in Section 4.10, *Hydrology and Water Quality*, of the EIR as being within the FEMA-mapped floodway and an additional portion is within the FEMA-mapped 100-year flood hazard area. However, as analyzed under Impact HWQ-4, "[f]or the sites partially within the 100-year floodplain, development would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. This includes the prohibition of fill in County-identified special flood hazard areas (refer to Section 7B-12 of the Sonoma County Code of Ordinances), and requiring review and approval of proposed drainage facilities by Permit Sonoma. Rezoning Sites that are within the Floodway Combining District (F1) or Floodplain Combining District (F2) would be required to comply with County requirements as stated in Articles 56 and 58, respectively, of the Sonoma County of Ordinances. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. Therefore, increased flooding on adjacent parcels to the Rezoning Sites would not occur because of the project."

Response 270.3

The commenter states that the current sewer system in Guerneville cannot keep up with current residents. The commenter states that the sewage infrastructure north of Main Street would need to be evaluated, removed, and redone.

Please refer to Master Response UTIL regarding wastewater infrastructure availability. Please refer to Master Response EXST regarding existing conditions of wastewater infrastructure.

Response 270.4

The commenter states a concern that more residents would increase traffic coming in and going out of Guerneville and this would have a negative impact on businesses in town.

Please refer to Master Response TRA regarding traffic congestion, and Master Response EXST regarding existing conditions of roadways. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes analysis of accessibility of businesses and resorts.

Response 270.5

The commenter expresses that they are not against affordable housing, but that they do not believe Laughlin Road is an acceptable location for affordable housing from a health and safety perspective.

The commenter's opinion is noted and passed on to decision-makers for review. Please refer to Master Response HE regarding opposition to specific Rezoning Sites. Please refer to Master Response SITE regarding site selection criteria.

EIR Public Comment 271

COMMENTER: Rick Savel

DATE: February 22, 2023

Response 271.1

The commenter forwarded a letter regarding the Penngrove Sewer Zone Capacity Study from 2002, related to concerns about existing capacity issues.

This comment does not pertain to the contents or adequacy of the Draft EIR. No response is required. Please refer to Master Response EXST regarding existing infrastructure.

4 Summary of Public Hearing Comments

Public comments received during the February 2, 2023, Planning Commission meeting are summarized and responded to below.

Response 1

The commenters ask if sites surrounding the selected Rezoning Sites were given notice.

The County of Sonoma distributed a Notice of Preparation of the Draft EIR and held a public scoping meeting for input on preparation of the Draft EIR, as described in Section 1, *Introduction,* on page 1-4 of the Draft EIR. Public participation efforts undertaken for the Housing Element Update itself are detailed in the Draft Housing Element beginning on page 2 under Section 1.4, *Public Participation.* Refer to Master Response SITE for more information about property owner notification.

Response 2

The commenters ask if development at each of the proposed Rezoning Sites would include public outreach and accept public comment.

Please refer to Section 1.2 of the Draft EIR. As stated therein, the intent of the EIR is to enable future development by-right, without further discretionary approvals. If future development projects are proposed on the Rezoning Sites that require a discretionary action (e.g., a future project is not consistent with the zoning or land use designation and requires a zoning or General Plan amendment), then additional CEQA analysis may be required. However, the project would not modify the County's review process for future development projects on the Rezoning Sites. Existing processes, including public notification, opportunities for public involvement, and County discretionary actions would remain.

Response 3

The commenters ask if development of each of the proposed Rezoning Sites would be by-right.

Development proposed at each of the Rezoning Sites would be required to be consistent with the zoning code. If the proposed development is consistent, then the only review required for the development would be the design review, which would not be discretionary.

Response 4

The commenters ask if a density bonus would trigger discretionary review. The commenter asks if there are any conditions that would trigger additional environmental review of a Rezoning Site.

The state's density bonus law requires the County to grant, upon request, a density bonus and incentives or concessions to a residential development application that proposes five or more units and for which the developer agrees to construct at least the minimum required number of affordable, senior, student, or other qualifying units, or agrees to donate land for such housing.

Each development facilitated by the project on Rezoning Sites, regardless of whether it takes advantage of a density bonus, would be subject to administrative review to determine consistency with the project as analyzed in the EIR. If additional analysis and mitigation is required, it would be implemented as a

condition for the proposed development. Generally speaking, if proposed development is consistent with the EIR for the proposed project then additional environmental review would not be required. However, development on a Rezoning Site would be required to do additional studies if required in the EIR, such as a biological resources screening and assessment as required by BIO-1, an architectural history evaluation as required by CUL-1, and/or an archaeological resources study as required by CUL-3. The County would also review for adherence to County code and policies and implementation of any applicable mitigation measures adopted as standards of approval or other enforceable development standard.

Response 5

The commenters ask how a development proposal would be treated if the proposed development had a density lower than that of a Rezoning Site. The commenters ask if there is a minimum density requirement.

New development applications on a Rezoning Site would be required to meet the minimum density based on the requirements outlined in the zoning code, within the developable area for that site. Please refer to Response 112.6 regarding future development of the Rezoning Sites to the minimum density. . Final density at each project site will depend on the development proposed and site-specific factors.

Response 6

The commenters express concerns about the existing sewer and water systems.

This comment has been noted. Please refer to Master Response UTIL.

Response 7

The commenters express concern regarding wildfire and flood risk and associated emergency evacuation.

This comment has been noted. Please refer to Master Response FIRE and Master Response EMG.

Response 8

The commenters express concern regarding impacts to aesthetics and community character.

This comment has been noted. Please refer to Section 4.1, *Aesthetics,* of the Draft EIR for a detailed analysis of potential impacts to aesthetics. As stated therein, the proposed project may impact the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Response 9

The commenters express concern regarding existing infrastructure near each of the Rezoning Sites. The commenters express concern regarding the lack of existing services and infrastructure such as medical centers, gas stations, grocery stores, and other commercial services.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions or lack thereof of services and infrastructure.

Response 10

The commenters express concern regarding future population growth and how that growth may impact fire protection, police protection, and schools.

This comment has been noted. Please refer to Section 4.15, *Public Services and Recreation,* of the Draft EIR.

As stated therein, while the project would generate additional demand for fire services, it would not substantially reduce existing response times or require the construction of new or altered fire stations and development facilitated by the project on Rezoning Sites would be required to comply with existing regulations regarding fire safety. Additionally, the increased population would generate a need for 12 additional police officers throughout the county, with no more than three at any one station. The Draft EIR is required to analyze environmental impacts associated with the construction of new police and/or fire facilities, and an additional three officers in any given station throughout the county would not require additional facilities to be built. Therefore, impacts to fire and police services would be less than significant.

As stated under Impact PS-3 beginning on page 4.15-13, existing laws would require future project applicant(s) of any development facilitated by the project on Rezoning Sites to pay school impact fees at the time building permits are issued. These fees are used by Sonoma County School Districts to mitigate impacts associated with long-term operation and maintenance of school facilities. The applicant's fees would be determined at the time of the building permit issuance and would reflect the most current fee amount requested by the applicable district. The payment of school developer fees is considered adequate mitigation of schools impacts under CEQA. Therefore, impacts to schools are considered less than significant without mitigation.

Response 11

The commenters express concern regarding the placement of each Rezoning Site and opposition to the proposed Rezoning Sites.

This comment has been noted. For additional information regarding Rezoning Site selection or criteria, please refer to Master Response SITE. For concerns regarding opposition to the Housing Element or selected Rezoning Sites, please refer to Master Response HE.

Response 12

The commenters express concern regarding increased traffic, road safety, and pedestrian safety.

For concerns regarding traffic, please refer to Master Response TRA.

Please refer to Impact TRA-2 in Section 4.16, *Transportation,* of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

5 Revisions to the Draft EIR

Chapter 5 presents specific changes to the text of the Draft EIR that are being made in response to comments received or to make corrections. In no case do these revisions result in a greater number of impacts or impacts of a substantially greater severity than those set forth in the Draft EIR. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with underlined and deleted text is indicated with ~~strikeout~~. Page numbers correspond to the page numbers of the Draft EIR.

Executive Summary

Page ES-1

The Housing Element Update would rezone 59 urban sites located in designated Urban Service Areas throughout unincorporated Sonoma County, listed in Table 2-1, for by-right, ~~medium-density~~ high-density housing[1]. In addition, 2~~0~~5 additional inventory sites do not require rezoning~~would not be rezoned~~ under implementation of the project.

footnote 1:

> By-right high-density~~medium-density~~ housing means that no discretionary land use approvals for the development of ~~medium-density~~ zoning-consistent housing would be required on the sites. ~~Design~~ Objective design review approval is required for all multifamily or mixed-use housing development with more than 3 units.

Page ES-2:

Rezoning Sites analyzed for rezoning to R2 (Medium-Density Residential), with a base density of 10 to 11 units per acre and assuming application of the County's Rental Housing Opportunity Area program, which automatically doubles a site's density for projects that include at least 40 percent of units as affordable to lower income households, as well as rezoning to R3, with a base density of 20 units per acre, and were assumed to be rezoned to allow a density of 20 to 22 units per acre, respectively.

Beginning on page ES-5, Table ES-1:

Impact	Mitigation Measure (s)	Residual Impact
Agriculture and Forestry Resources		
Impact AG-3. The project would rezone some sites that are adjacent to agricultural uses, and may indirectly impact those uses.	**AG-1 Interim Agricultural Buffers**. Development facilitated by the project on the Rezoning Sites adjacent to active agricultural operations shall provide fencing and a minimum buffer of 200 feet to the agricultural operations, consistent with 26-88-040(f) of the Sonoma County Zoning Code. If this distance is not practical due to project design or features, a minimum 100-foot buffer is acceptable if it complies with all of the requirements for a reduced buffer and a vegetative screen is provided as specified in Section 26-88-040(f).	Less than significant
Air Quality		
Impact AQ-2. Project construction would temporarily increase air pollutant emissions, possibly	**AQ-1 Basic Construction Mitigation Measures.** All development facilitated by the project on the Rezoning Sites (regardless of whether the development is under the	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
creating localized areas of unhealthy air pollution levels or air quality nuisances.	jurisdiction of the NSCAPCD or the BAAQMD) shall be required to reduce construction emissions of reactive organic gases, nitrogen oxides, and particulate matter (PM_{10} and $PM_{2.5}$) by implementing the BAAQMD's Basic Construction Mitigation Measures (described below) or equivalent, expanded, or modified measures based on project and site-specific conditions. 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day, with priority given to the use of recycled water for this activity. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping shall be prohibited. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. 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. 6. 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. 7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator. 8. A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. **AQ-2 Additional Construction Mitigation Measures.** In addition to implementation of Mitigation Measure AQ-1, for any project <u>on the Rezoning Sites</u> (regardless of whether the development is under the jurisdiction of the NSCAPCD or the BAAQMD) that meets the following conditions and as listed in Table 4.3-6, the County shall condition development facilitated by the project to implement BAAQMD CEQA Air Quality Guidelines' Additional Construction Mitigation Measures: 1. Exceed the BAAQMD construction screening threshold of a change in allowable dwelling units of 114 dwelling units for single-family residences or 240 dwelling units for multi-family residences 2. Would result in a change in allowable dwelling units of more than 38 units	

Impact	Mitigation Measure (s)	Residual Impact
	3. Would require demolition or simultaneous occurrence of more than two construction phases 4. Simultaneous construction of more than one land use type (e.g., a mixed-use project involving commercial and residential) 5. Extensive material transport of more than 10,000 cubic yards In addition to implementation of Mitigation Measure AQ-1, for any Rezoning Sites that meet the criteria listed above, the following measures (or equivalent, expanded, or modified measures based on project- and site-specific conditions) shall be implemented throughout construction of the project: 1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe. 2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. 3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks shall have at maximum 50 percent air porosity. 4. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. 5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. 6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site. 7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12-inch compacted layer of wood chips, mulch, or gravel. 8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent. 9. Minimizing the idling time of diesel powered construction equipment to two minutes. 10. The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NO_X reduction and 45 percent PM reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices	

Impact	Mitigation Measure (s)	Residual Impact
	such as particulate filters, and/or other options as such become available. 11. Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings). 12. Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NO_x and PM. 13. Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines.	
Biological Resources		
Impact BIO-1. Future development facilitated by the project could impact special status species and their habitat during construction and/or operation.	**BIO-1 Biological Resources Screening and Assessment.** For projects <u>on the Rezoning Sites</u> in the BSAs that would require ground disturbance through clearing/grading or vegetation trimming, the project applicant shall engage a qualified biologist (having the appropriate education and experience level) to perform a preliminary Biological Resources Screening and Assessment to determine whether the project has any potential to impact special status biological resources, inclusive of special status plants and animals, sensitive vegetation communities, jurisdictional waters (including creeks, drainages, streams, ponds, vernal pools, riparian areas and other wetlands), critical habitat, wildlife movement area, or biological resources protected under local or regional (City or County) ordinances or an existing Habitat Conservation Plan (HCP) or Natural Community Conservation Plan, including the Santa Rosa Plain Conservation Strategy. If it is determined that the project has no potential to impact biological resources, no further action is required. If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 500 feet around the project footprint, and to determine the potential impacts to those resources. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, state, and/or federal agencies. If the project would have the potential to impact these resources, the following mitigation measures (Mitigation Measures BIO-2 through BIO-12) shall be incorporated, as applicable, to reduce impacts to a less than significant. Pending the results of the project-specific biological analysis, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, NMFS, CDFW, and/or other local, state, and federal agencies may be required. Note that specific surveys described in the mitigation measures below may be completed as part of the project-specific biological analysis where suitable habitat is present.	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	BIO-2 Special Status Plant Species Surveys. If the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) determines that there is potential for ~~significant~~ impacts to federally or state-listed plants or ~~regional population level impacts to~~ species with a CRPR of 1B or 2B from project development, a qualified biologist shall complete surveys for special status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). Surveys shall be conducted following CDFW's 2018 Protocol for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities and, as applicable, the Santa Rosa Plain Conservation Strategy Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain, including, but not limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts, such as altering off-site hydrological conditions where these species may be present, or any formal updates of these protocols. The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species identified in the project-specific biological analysis. All plant surveys shall be conducted by a qualified biologist during the blooming season prior to initial ground disturbance. More than one year of surveys may be required to establish that plants are absent, and the above Santa Rosa Plain Conservation Strategy Appendix D requires a minimum of two years of surveys, which shall be implemented unless otherwise approved in writing by CDFW. All special status plant species identified on site shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the County, and the CDFW and/or USFWS, as appropriate, for review and/or approval. The project shall obtain written approval of the survey reports from CDFW prior to the start of construction, unless otherwise approved in writing by CDFW. If any special-status plants are observed, the Project shall: 1) avoid all direct and indirect impacts to the special-status plants, and 2) prepare and implement an avoidance plan that is approved in writing by CDFW prior to Project start. If CESA listed plants are observed and impacts cannot be avoided, the Project shall obtain a CESA ITP from CDFW. For impacts to federal Endangered Species Act (ESA) listed plants, the Project shall obtain authorization from USFWS.	

Impact	Mitigation Measure (s)	Residual Impact
	BIO-3 Special Status Plant Species Avoidance, Minimization, and Mitigation. If federally and/or state-listed or CRPR 1B or 2 species are found during special status plant surveys (pursuant to Mitigation Measure BIO-2), and would be directly impacted, or there would be a population-level impact to non-listed sensitive species, then the project shall be re-designed to avoid impacting those plant species. Rare and listed plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm. For projects on Rezoning Sites in BSAs located within the Santa Rosa Plain Area, protocol rare plant surveys shall be conducted, and impacts to suitable rare plant habitat mitigated, in accordance with the 2007 USFWS Santa Rosa Plain Programmatic Biological Opinion, as amended in 2020. **BIO-4 Restoration, ~~and~~ Monitoring, and Habitat Compensation** Development and/or restoration activities shall be conducted in accordance with a site-specific Habitat Restoration Plan. If federally or state-listed plants or non-listed special status CRPR 1B and 2 plant populations cannot be avoided, and will be impacted by development, all impacts shall be mitigated by the applicant at a ratio not lower than 1:1 and to be determined by the County (in coordination with CDFW and USFWS as ~~and if~~ applicable) for each species as a component of habitat restoration, unless otherwise approved in writing by CDFW. For impacts to state-listed plants, habitat compensation at a minimum 1:1 mitigation to impact ratio shall be provided, which may include either the purchase of credits at a CDFW-approved mitigation or conservation bank or purchasing appropriate habitat and conserving it in perpetuity through a conservation easement and management plan, which shall be prepared, funded, and implemented by the project proponent in perpetuity, unless otherwise approved in writing by CDFW. A qualified biologist shall prepare and submit a restoration plan to the County and CDFW for review and approval. (Note: if a federally and/or state-listed plant species will be impacted, the restoration plan shall be submitted to the USFWS and/or CDFW for review, and federal and/or state take authorization ~~may~~ will be obtained from ~~required by~~ these agencies.) The restoration plan shall include, at a minimum, the following components […] **BIO-5 Endangered/Threatened Species Habitat Assessments and Protocol Surveys.** Specific habitat assessments and survey protocols are established for several federally- and state-listed endangered or threatened species. If the results of the project-specific biological analysis determine that suitable habitat may be present for any such species, protocol habitat assessments/surveys shall	

Impact	Mitigation Measure (s)	Residual Impact
	be completed in accordance with CDFW, NMFS, and/or USFWS protocols prior to issuance of any construction permits. If projects are located within the Santa Rosa Plain Area, surveys shall be conducted for CTS in accordance with the Santa Rosa Plain Conservation Strategy (2005) with prior written approval from CDFW and USFWS. Due to numerous documented occurrences of CTS in the Santa Rosa Plain in conjunction with the documented dispersal distances for the species of up to 1.3 miles, it has been established that CTS are present within many grassland and vernal pool habitats within the Santa Rosa Plain rendering surveys unnecessary, and therefore any protocol CTS surveys shall be approved in writing by CDFW and USFWS prior to conducting the survey and habitat compensation for impacts to CTS habitat shall be provided by the Project pursuant to the Santa Rosa Plain Conservation Strategy even if survey results are negative, unless otherwise approved in writing by CDFW and USFWS. If impacts to grassland or vernal pool habitat will occur, the Project shall consult with CDFW to determine if a CESA ITP for CTS is warranted. If CESA listed animal species such as CTS cannot be avoided, the Project shall obtain a CESA ITP from CDFW prior to Project construction. For impacts to ESA listed wildlife species such as CTS, the Project shall obtain authorization from USFWS. While often consistent with the Santa Rosa Plain Conservation Strategy, the CESA ITP habitat compensation requirements may differ from it based on a site-specific analysis. If through consultation with the CDFW, NMFS, and/or USFWS it is determined that protocol habitat assessments/surveys are not required, the applicant shall complete and document this consultation and submit it to the County prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they understand the protocol requirements and shall hire a qualified biologist to conduct protocol surveys. **BIO-6 Endangered/Threatened Animal Species Avoidance and Minimization.** The following measures shall be applied to aquatic and/or terrestrial animal species as determined by the project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1. 1. Ground disturbance shall be limited to the minimum necessary to complete the project. A qualified biologist shall flag the project limits of disturbance. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance. 2. All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and October 31 to avoid impacts to sensitive aquatic species. Any work outside these dates would require project-specific approval from	

Impact	Mitigation Measure (s)	Residual Impact
	the County and may be subject to regulatory agency approval. 3. All projects occurring within or adjacent to sensitive habitats that may support federally and/or state-listed endangered/threatened species shall have a CDFW- and/or USFWS-approved biologist present during all initial ground disturbing/vegetation clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed, said biologist shall conduct daily pre-activity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the CDFW, NMFS, and/or USFWS, said biologist may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are fully implemented. 4. No endangered/threatened species shall be captured and relocated without express permission from the CDFW, NMFS, and/or USFWS. 5. If at any time during project construction an endangered/threatened species enters the construction site or otherwise may be impacted by the project, all project activities shall cease. A CDFW/USFWS-approved biologist shall document the occurrence and consult with the CDFW and USFWS, as appropriate, to determine whether it was safe for project activities to resume. 6. For all projects occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete. 7. All vehicle maintenance/fueling/staging shall occur not less than 100 feet from any riparian habitat or water body, including seasonal wetland features. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies. 8. No equipment shall be permitted to enter wetted portions of any affected drainage channel. 9. If project activities could degrade water quality, water quality sampling shall be implemented to identify the pre-project baseline, and to monitor during construction for comparison to the baseline. 10. If water is to be diverted around work sites, the applicant shall submit a diversion plan (depending upon the	

Impact	Mitigation Measure (s)	Residual Impact
	species that may be present) to the CDFW, RWQCB, USFWS, and/or NMFS for their review and approval prior to the start of any construction activities (including staging and mobilization). If pumps are used, all intakes shall be completely screened with wire mesh not larger than five millimeters to prevent animals from entering the pump system. 11. At the end of each workday, excavations shall be secured with cover or a ramp provided to prevent wildlife entrapment. 12. All trenches, pipes, culverts, or similar structures shall be inspected for animals prior to burying, capping, moving, or filling. 13. The CDFW/USFWS-approved biologist shall remove invasive aquatic species such as bullfrogs and crayfish from suitable aquatic habitat whenever observed and shall dispatch them in a humane manner and dispose of properly. 14. Considering the potential for projects to impact federally and state-listed species and their habitat, the applicant shall contact the CDFW and USFWS to identify mitigation banks within Sonoma County during project development. If the results of the project-specific biological analysis (Mitigation Measure BIO-1) determine that impacts to federally and state threatened or endangered species habitat are expected, the applicant shall explore species-appropriate mitigation bank(s) servicing the region for purchase of mitigation credits. If projects are located within the Santa Rosa Plain Area, mitigation for impacts to CTS shall be implemented in accordance with the Santa Rosa Plain Conservation Strategy (2005). 15. For projects occurring in the Petaluma BSA (PET-1 through PET-4), prior to grading and construction in natural areas of containing suitable upland habitat, a qualified biologist shall conduct a preconstruction survey for CTS. The survey shall include a transect survey over the entire project disturbance footprint (including access and staging areas), and mapping of burrows that are potentially suitable for salamander occupancy. If any CTS are detected, no work shall be conducted until the individual leaves the site of their own accord, unless federal and state "take" authorization has been issued for CTS relocation. Typical preconstruction survey procedures, such as burrow scoping and burrow collapse, cannot be conducted without federal and state permits. If any life stage of CTS is found within the survey area, the applicant shall consult with the USFWS and CDFW to determine the appropriate course of action to comply with the FESA and CESA, if permits are not already in place at the time of construction. **BIO-7 Non-Listed Special Status Animal Species Avoidance and Minimization.** The project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) shall	

Impact	Mitigation Measure (s)	Residual Impact
	identify some or all the below measures that will be required and applicable to the individual project: 1. For non-listed special status terrestrial amphibians and reptiles, a qualified biologist shall complete coverboard surveys within 14 days of the start of construction. The coverboards shall be at least four feet by four feet and constructed of untreated plywood placed flat on the ground as determined by the project-specific biological assessment (pursuant Mitigation Measure BIO-1). The qualified biologist shall check the coverboards once per week for each week after placement up until the start of vegetation removal. The biologist shall capture all non-listed special status and common animals found under the coverboards and shall place them in five-gallon buckets for transportation to relocation sites. The qualified biologist shall review all relocation sites and those sites shall consist of suitable habitat. Relocation sites shall be as close to the capture site as possible but far enough away to ensure the animal(s) is not harmed by project construction. Relocation shall occur on the same day as capture. The biologist shall submit CNDDB Field Survey Forms to the CFDW for all special status animal species observed. 2. Prior to construction, a qualified biologist shall conduct a survey of existing buildings to determine if bats are present. The survey shall be conducted during the non-breeding season (November through March). The biologist shall have access to all structures and interior attics, as needed. If a colony of bats is found roosting in any structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.). 3. If bats are roosting in the building during the daytime but are not part of an active maternity colony, then exclusion measures must include one-way valves that allow bats to get out but are designed so that the bats may not re-enter the structure. Maternal bat colonies shall not be disturbed. 4. A qualified biologist shall conduct pre-construction clearance surveys within 14 days of the start of construction (including staging and mobilization). The surveys shall cover the entire disturbance footprint plus a minimum 200-foot buffer, and shall identify all special status animal species that may occur on-site. All non-listed special status species shall be relocated from the site either through direct capture or through passive exclusion. The biologist shall submit a report of the pre-construction survey to the County for their review and approval prior to the start of construction. 5. A qualified biologist shall be present during all initial ground-disturbing activities, including vegetation removal to recover special status animal species unearthed by construction activities. 6. Project activities shall be restricted to daylight hours.	

Impact	Mitigation Measure (s)	Residual Impact
	7. Upon completion of the project, a qualified biologist shall prepare a Final Compliance Report documenting all compliance activities implemented for the project, including the pre-construction survey results. The report shall be submitted to the County within 30 days of completion of the project. 8. If special status bat species may be present and impacted by the project, a qualified biologist shall conduct, within 30 days of the start of construction, presence/absence surveys for special status bats in consultation with the CDFW where suitable roosting habitat is present. Surveys shall be conducted using acoustic detectors and by searching tree cavities, crevices, and other areas where bats may roost. If active roosts are located, exclusion devices such as netting shall be installed to discourage bats from occupying the site. If a qualified biologist determines a roost is used by a large number of bats (large hibernaculum), bat boxes shall be installed near the project site. The number of bat boxes installed will depend on the size of the hibernaculum and shall be determined through consultation with CDFW. If a maternity colony has become established, all construction activities shall be postponed within a 500-foot buffer around the maternity colony until it is determined by a qualified biologist that the young have dispersed. Once it has been determined that the roost is clear of bats, the roost shall be removed immediately. **BIO-8 Western Pond Turtle Avoidance and Minimization.** For projects located on Rezoning Sites in the Penngrove BSA (PEN-1 through PEN-9), a qualified biologist shall conduct pre-construction clearance surveys for western pond turtle within 14 days prior to the start of construction (including staging and mobilization) in areas of suitable habitat. The biologist shall flag limits of disturbance for each construction phase. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance. If western pond turtles are observed, they shall be allowed to leave the site on their own. **BIO-9 American Badger Avoidance and Minimization.** For projects located on Rezoning Sites in the Petaluma BSA (PET-1 through PET-4), a qualified biologist shall conduct surveys of the grassland habitat on-site to identify any American badger burrows/dens. These surveys shall be conducted not more than 14 days prior to the start of construction. Impacts to active badger dens shall be avoided by establishing exclusion zones around all active badger dens, within which construction related activities shall be prohibited until denning activities are complete or the den is abandoned. A qualified biologist shall monitor each den once per week in order to track the status of the den and to determine when a den area has been cleared for construction.	

Impact	Mitigation Measure (s)	Residual Impact
	BIO-10 Pre-construction Surveys for Nesting Birds for Construction Occurring within Nesting Season. For projects on Rezoning Sites that require construction, grading, the removal of trees or vegetation, or other project-related improvements, construction activities shall occur outside of the nesting season (September 16 to January 31), and no mitigation activity is required. If construction activities must occur during the nesting season (February 1 to September 15), a qualified biologist shall conduct surveys for nesting birds ~~covered by the CGFC no more than~~ within 14 days prior to project activities ~~vegetation removal~~ and shall conduct additional surveys if there is a lapse of 14 days or more in construction activities. The surveys shall include the entire disturbance area plus at least a ~~200~~ 500-foot buffer around the project site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of ~~50~~ 250 feet for non-raptor bird species and at least ~~150~~ 500 feet for raptor species, unless determined otherwise by the qualified biologist. Buffer distances for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distances shall be specified to protect the bird's normal behavior thereby preventing nesting failure or abandonment. The buffer distance recommendation shall be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The qualified biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer is established. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. The biologist shall submit a report of these preconstruction nesting bird surveys to the County to document compliance within 30 days of its completion. **BIO-11 Worker Environmental Awareness Program.** If potential impacts to special status species are identified in the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), prior to initiation of construction activities (including staging and mobilization), all personnel associated with project construction shall	

Impact	Mitigation Measure (s)	Residual Impact
	attend Worker Environmental Awareness Program training, conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the BSAs for the project. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of projects. All employees shall sign a form documenting provided by the trainer indicating they have attended the Worker Environmental Awareness Program and understand the information presented to them. The form shall be submitted to the County to document compliance. **BIO-12 Invasive Weed Prevention and Management Program.** For those projects <u>on Rezoning Sites</u> where activity would occur within or adjacent to sensitive habitats, as determined by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), prior to start of construction a qualified biologist shall develop an Invasive Weed Prevention and Management Plan to prevent invasion of native habitat by non-native plant species. A list of target species shall be included, along with measures for early detection and eradication. All disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas. In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six weeks since ground disturbing activities ceased. If exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a qualified biologist and in accordance with the restoration plan. Landscape species shall not include noxious, invasive, and/or non-native plant species that are recognized on the federal Noxious Weed List, California Noxious Weeds List, and/or California Invasive Plant Council Moderate and High Risk Lists.	
Impact BIO-3. Future development facilitated by the project could impact jurisdictional state or federally protected wetlands during construction and/or operation.	**BIO-15 Jurisdictional Delineation.** If potentially jurisdictional wetlands are identified by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), a qualified biologist shall complete a jurisdictional delineation. The jurisdictional delineation shall determine the extent of the jurisdiction for CDFW, USACE, and/or RWQCB, and shall be conducted in accordance with the requirement set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the County, USACE, RWQCB, and CDFW, as appropriate, for review and approval. Jurisdictional areas shall be avoided to the maximum extent possible. If jurisdictional areas are expected to be impacted, then the	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	RWQCB would require a Waste Discharge Requirement permit and/or Section 401 Water Quality Certification (depending upon whether the feature falls under federal jurisdiction). If CDFW asserts its jurisdictional authority, then a Lake or Streambed Alteration Agreement pursuant to Section 1600 et seq. of the CFGC would also be required prior to construction within the areas of CDFW jurisdiction. If the USACE asserts its authority, then a permit pursuant to Section 404 of the CWA would be required. Furthermore, a compensatory mitigation program shall be implemented by the applicant in accordance with Mitigation Measure BIO-4 and the measures set forth by the regulatory agencies during the permitting process. Compensatory mitigations for all permanent impacts to waters of the U.S. and waters of the state shall be completed at a ratio as required in applicable permits. All temporary impacts to waters of the U.S. and waters of the state shall be fully restored to natural condition. **BIO-16 General Avoidance and Minimization.** Projects shall be designed to avoid potential jurisdictional features identified in jurisdictional delineation reports. Projects <u>on Rezoning Sites</u> that may impact jurisdictional features shall provide the County with a report detailing how all identified jurisdictional features will be avoided, including groundwater draw down. 1. Any material/spoils generated from project activities shall be located away from jurisdictional areas or special status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls (non- monofilament), covers, sand/gravel bags, and straw bale barriers, as appropriate. 2. Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank. 3. Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative will be notified.	
Cultural Resources		
Impact CUL-1. The project has the potential to cause a significant impact on a historic resource if development facilitated by the project would cause a substantial adverse change in the significance of that resource.	**CUL-1 Architectural History Evaluation.** For any future project <u>on a Rezoning Site that is</u> ~~proposed~~ on or adjacent to a property that includes buildings, structures, objects, sites, landscape/site plans, or other features that are 45 years of age or older at the time of or permit application, the project applicant shall hire a qualified architectural historian to prepare an historical resources evaluation. The qualified architectural historian or historian shall meet the Secretary of the Interior's (SOI) Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an	Significant and unavoidable

Impact	Mitigation Measure (s)	Residual Impact
	intensive-level evaluation in accordance with the guidelines and best practices recommended by the State Office of Historic Preservation to identify any potential historical resources in the proposed project area. Under the guidelines, properties 45 years of age or older shall be evaluated within their historic context and documented in a technical report and on Department of Parks and Recreation Series 523 forms. The report will be submitted to the County for review prior to any permit issuance. If no historic resources are identified, no further analysis is warranted. If historic resources are identified by the Architectural History Evaluation, the project shall be required to implement Mitigation Measure CUL-2. **CUL-2 Architectural History Mitigation.** If historical resources are identified in an area proposed for redevelopment as the result of the process described in Mitigation Measure CUL-1, the project applicant shall reduce impacts. Application of mitigation shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g. preservation in place). In conjunction with any project that may affect the historical resource, the project applicant shall provide a report identifying and specifying the treatment of character-defining features and construction activities to the County for review and approval, prior to permit issuance, to avoid or substantially reduce the severity of the proposed activity on the historical qualities of the resource. Any and all features and construction activities shall become Conditions of Approval for the project and shall be implemented prior to issuance of construction (demolition and grading) permits. Mitigation measures may include but are not limited to compliance with the Secretary of the Interior's Standards for Treatment of Historic Properties and documentation of the historical resource in the form of a Historic American Building Survey (HABS)-like report. The HABS report shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements.	
Impact CUL-2. Development facilitated by the project has the potential to cause a substantial adverse change in the significance of an archaeological resource, including those that qualify as historical resources.	**CUL-3 Phase I Archaeological Resource Study.** Prior to project approval, the project applicant shall investigate the potential to disturb archaeological resources. If the project will involve any ground disturbance, a Phase I cultural resources study shall be performed by a qualified professional meeting the SOI's PQS for archaeology (National Park Service 1983). If a project would solely involve the refurbishment of an existing building and no ground disturbance would occur, this measure would not be required. A Phase I cultural resources study shall include a pedestrian survey of the project site and sufficient background research and field sampling to determine whether archaeological resources may be present. Archival research shall include a records search of the Northwest Information Center no more than two years old and a Sacred Lands File search with the NAHC. The Phase I technical report documenting the study shall include	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	recommendations that must be implemented prior to and/or during construction to avoid or reduce impacts on archaeological resources, to the extent that the resource's physical constituents are preserved or their destruction is offset by the recovery of scientifically consequential information. The report shall be submitted to the County for review and approval, prior to the issuance of any grading or construction permits, to ensure that the identification effort is reasonable and meets professional standards in cultural resources management. Recommendations in the Phase I technical report shall be made Conditions of Approval and shall be implemented throughout all ground disturbance activities. **CUL-4 Extended Phase I Testing.** For any projects on a Rezoning Site that is proposed within 100 feet of a known archaeological site and/or in areas identified as sensitive by the Phase I study (Mitigation Measure CUL-3), the project applicant shall retain a qualified archaeologist to conduct an Extended Phase I (XPI) study to determine the presence/absence and extent of archaeological resources on the project site. XPI testing shall comprise a series of shovel test pits and/or hand augured units and/or mechanical trenching to establish the boundaries of archaeological site(s) on the project site. If the boundaries of the archaeological site are already well understood from previous archaeological work and is clearly interpretable as such by a qualified cultural resources professional, an XPI will not be required. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s) and any XPI work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4. All archaeological excavation shall be conducted by a qualified archaeologist(s) under the direction of a principal investigator meeting the SOI's PQS for archaeology (National Park Service 1983). If an XPI report is prepared, it shall be submitted to Sonoma County for review and approval prior to the issuance of any grading or construction permits. Recommendations contained therein shall be implemented for all ground disturbance activities. **CUL-5 Archaeological Site Avoidance.** Any identified archaeological sites (determined after implementing Mitigation Measures CUL-3 and/or CUL-4) shall be avoided by project-related construction activities. A barrier (temporary fencing) and flagging shall be placed between the work location and any resources within 60 feet of a work location to minimize the potential for inadvertent impacts. **CUL-6 Phase II Site Evaluation.** If the results of any Phase I and/or XPI (Mitigation Measures CUL-3 and/or CUL-4) indicate the presence of archaeological resources that cannot be avoided by the project (Mitigation Measure CUL-5) and that have not been adequately evaluated for CRHR	

Impact	Mitigation Measure (s)	Residual Impact
	listing at the project site, the qualified archaeologist will conduct a Phase II investigation to determine if intact deposits remain and if they may be eligible for the CRHR or qualify as unique archaeological resources. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s) and any Phase II work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4. A Phase II evaluation shall include any necessary archival research to identify significant historical associations and mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit. The sample excavation will characterize the nature of the sites, define the artifact and feature contents, determine horizontal and vertical boundaries, and retrieve representative samples of artifacts and other remains. If the archeologist and, if applicable, a Native American monitor (see Mitigation Measure TCR-4) or other interested tribal representative determine it is appropriate, cultural materials collected from the site shall be processed and analyzed in a laboratory according to standard archaeological procedures. The age of the materials shall be determined using radiocarbon dating and/or other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards. The significance of the sites shall be evaluated according to the criteria of the CRHR. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation publication "Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)." The report shall be submitted to Sonoma County for review and approval prior to the issuance of any grading or construction permits. Recommendations in the Phase II report shall be implemented for all ground disturbance activities. **CUL-7 Phase III Data Recovery.** If the results of the Phase II site evaluation (Mitigation Measure CUL-6) yield resources that meet CRHR significance standards and if the resource cannot be avoided by project construction in accordance with Mitigation Measure CUL-5, the project applicant shall ensure that all recommendations for mitigation of archaeological impacts are incorporated into the final design and approved by the County prior to construction. Any necessary Phase III data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the SOI standards for archaeology according to a research design reviewed and approved by the County prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the California Office of Historic Preservation Planning Bulletin 5 (1991), Guidelines	

Impact		
	for Archaeological Research Design, or the latest edition thereof. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s) and any Phase III work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4. As applicable, the final Phase III Data Recovery reports shall be submitted to Sonoma County prior to issuance of any grading or construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities. **CUL-8 Cultural Resources Monitoring.** If recommended by Phase I, XPI, Phase II, or Phase III studies (Mitigation Measures CUL-3, CUL-4, CUL-6, and/or CUL-7), the project applicant shall retain a qualified archaeologist to monitor project-related, ground-disturbing activities. If archaeological resources are encountered during ground-disturbing activities, Mitigation Measures CUL-5 through CUL-7 shall be implemented, as appropriate. The archaeological monitor shall coordinate with any Native American monitor as required by Mitigation Measure TCR-4. **CUL-9 Unanticipated Discovery of Archaeological Resources.** If archaeological resources are encountered during ground-disturbing activities, work within 60 feet shall be halted and the project applicant shall retain an archaeologist meeting the SOI's PQS for archaeology (National Park Service 1983) immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of CCR Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. If the resource is of Native American origin, implementation of Mitigation Measures TCR-1 through TCR-4 may be required. Any reports required to document and/or evaluate unanticipated discoveries shall be submitted to the County for review and approval. Recommendations contained therein shall be implemented throughout the remainder of ground disturbance activities.	
Geology and Soils		
Impact GEO-6. Development facilitated by the project may directly or indirectly destroy a unique paleontological resource or site or unique geologic feature during ground disturbing activities.	**GEO-1 Paleontological Review of Project Plans.** For projects with proposed ground-disturbing activity on Rezoning Sites, the project applicant shall retain a Qualified Professional Paleontologist to review proposed ground disturbance associated with development to:	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	1. Assess if the project will require paleontological monitoring; 2. If monitoring is required, to develop a project-specific Paleontological Resource Mitigation and Monitoring Program (PRMMP) as outlined in Mitigation Measure GEO-2; 3. Draft the Paleontological Worker Environmental Awareness Program as outlined in Mitigation Measure GEO-3; and 4. Define within a project specific PRMMP under what specific ground disturbing activity paleontological monitoring will be required and the procedures for collection and curation of recovered fossils, as described in Mitigation Measures GEO-4, GEO-5, and GEO-6. The Qualified Paleontologist shall base the assessment of monitoring requirements on the location and depth of ground disturbing activity in the context of the paleontological potential and potential impacts outlined in this section. A qualified professional paleontologist is defined by the SVP standards as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least two years (SVP 2010). The County shall review and approve the assessment before grading permits are issued. **GEO-2 Paleontological Resources Mitigation and Monitoring Program.** For those projects <u>on Rezoning Sites</u> deemed to require a PRMMP under Mitigation Measure GEO-1 above, the Qualified Paleontologist shall prepare a PRMMP for submission to the County prior to the issuance of grading permits. The PRMMP shall include a pre-construction paleontological site assessment and develop procedures and protocol for paleontological monitoring and recordation. Monitoring shall be conducted by a qualified paleontological monitor who meets the minimum qualifications per standards set forth by the SVP. The PRMMP procedures and protocols for paleontological monitoring and recordation shall include: 1. Location and type of ground disturbance requiring paleontological monitoring. 2. Timing and duration of paleontological monitoring. 3. Procedures for work stoppage and fossil collection. 4. The type and extent of data that should be collected with recovered fossils. 5. Identify an appropriate curatorial institution. 6. Identify the minimum qualifications for qualified paleontologists and paleontological monitors. 7. Identify the conditions under which modifications to the monitoring schedule can be implemented. 8. Details to be included in the final monitoring report.	

Impact	Mitigation Measure (s)	Residual Impact

shall be submitted to the County for review and approval as to adequacy.

GEO-3 Paleontological Worker Environmental Awareness Program (WEAP). Prior to any ground disturbance on ~~within~~ Rezoning Sites underlain by geologic units with high paleontological resource potential, the applicant shall incorporate information on paleontological resources into the Project's Worker Environmental Awareness Training (WEAP) materials, or a stand-alone Paleontological Resources WEAP shall be submitted to the County for review and approval. The Qualified Paleontologist or his or her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff if fossils are discovered by construction staff. The Paleontological WEAP training shall be fulfilled simultaneously with the overall WEAP training, or at the first preconstruction meeting at which a Qualified Paleontologist attends prior to ground disturbance. Printed literature (handouts) shall accompany the initial training. Following the initial WEAP training, all new workers and contractors must be trained prior to conducting ground disturbance work. A sign-in sheet for workers who have completed the training shall be submitted to the County upon completion of WEAP administration.

GEO-4 Paleontological Monitoring. Paleontological monitoring shall only be required for those ground-disturbing activities identified under Mitigation Measure GEO-1, where construction activities (i.e., grading, trenching, foundation work) are proposed in previously undisturbed (i.e., intact) sediments with high paleontological sensitivities. Monitoring shall be conducted by a qualified professional paleontologist (as defined above) or by a qualified paleontological monitor (as defined below) under the supervision of the qualified professional paleontologist. Monitoring may be discontinued on the recommendation of the qualified professional paleontologist if they determine that sediments are likely too young, or conditions are such that fossil preservation would have been unlikely, or that fossils present have little potential scientific value. The monitoring depth required for each of the Rezoning Sites is provided in Table 4.7-3, in addition to the associated geologic unit.

Table 4.7-3 Rezoning Sites Subject to Mitigation

Potential Rezone Site(s)	Sensitive Geologic Unit(s)	Recommended Monitoring
GEY-1 through GEY-3, GUE-2 through GUE-4, LAR-1 through LAR-8, SAN-1, SAN-3, SAN-5, SAN-10	Quaternary young alluvium (Q, Qal)	None

Impact	Mitigation Measure (s)		Residual Impact
	GEY-4	Quaternary young alluvium (Q, Qal) Early Cretaceous to Late Jurassic Great Valley Complex (KJgvc)	None
	GUE-1	Quaternary old alluvial and marine terrace deposits (Qt)	All excavations within native (intact) sediments
	FOR-1 through FOR-6, GRA-1, GRA-3 through GRA-5, PET-1 through PET-3	Wilson Grove Formation (Twg, Pwg)	All excavations within native (intact) sediments
	GRA-2	Quaternary young alluvium (Qal)	None
	SAN-2, SAN-4, SAN-6 through SAN-9, AGU-1 through AGU-3, SON-1 through SON-4	Quaternary old alluvium (Qo)	All excavations within native (intact) sediments
	GLE-1, GLE-2	Huichica and Glen Ellen Formations (QT)	All excavations within native (intact) sediments
	PEN-1 through PEN-9	Petaluma Formation (Pp)	All excavations within native (intact) sediments
	PET-4	Wilson Grove Formation (Twg, Pwg) Pliocene to Miocene Sonoma Volcanics (Psv, Tsb) mapped within the southeast corner	All excavations within native (intact) sediments None

The following outlines minimum monitor qualifications and procedures for fossil discovery and treatment:

1. **Monitoring.** Paleontological monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources and meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor. The Qualified Paleontologist will determine the duration and timing of the monitoring based on the location and extent of proposed ground disturbance. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the surface or at depth, they may recommend that monitoring be reduced to periodic spot-

Impact	Mitigation Measure (s)	Residual Impact
	checking or cease entirely. Refer to Table 4.7-2 and Table 4.7-3 for a paleontological resource potential summary and recommendations for each of the 59 Rezoning Sites. 2. **Fossil Discoveries.** In the event of a fossil discovery by the paleontological monitor or construction personnel, all work in the immediate vicinity of the find shall cease. A Qualified Paleontologist shall evaluate the find before restarting construction activity in the area. If the Qualified Paleontologist determines that the fossil(s) is (are) scientifically significant; including identifiable specimens of vertebrate fossils, uncommon invertebrate, plant, and trace fossils; the Qualified Paleontologist (or paleontological monitor) shall recover them following standard field procedures for collecting paleontological as outlined in the PRMMP prepared for the project. 3. **Salvage of Fossils.** Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the Qualified Paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. If fossils are discovered, the Qualified Paleontologist (or Paleontological Monitor) shall recover them as specified in the project's PRMMP. **GEO-5 Preparation and Curation of Recovered Fossils.** Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the University of California Museum of Paleontology), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Paleontologist. **GEO-6 Final Paleontological Mitigation Report.** Upon completion of ground disturbing activity (and curation of fossils if necessary) the Qualified Paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated. The report shall be submitted to the County prior to occupancy permits. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.	
Greenhouse Gas Emissions		
Impact GHG-1. Development facilitated by the Housing Element	**GHG-1: Comply with BAAQMD Project-Level Land Use Thresholds.** Individual residential projects facilitated by the Housing Element Update project on Rezoning Sites shall comply with the following BAAQMD thresholds for land use	Significant and Unavoidable

Impact	Mitigation Measure (s)	Residual Impact
Update would not meet State GHG goals for 2030 or 2045.	projects as defined in the BAAQMD CEQA *Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, published April 2022, or its later adopted successor. Projects on the Rezoning Sites shall include, at a minimum, the following design elements: 1. Buildings a. The project shall not include natural gas appliances or natural gas plumbing. 2. Transportation a. The project shall achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2. As noted in the BAAQMD CEQA *Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, a project designed and built to incorporate these design elements would contribute its fair share to achieve California's long-term climate goals, and an agency reviewing the project under CEQA can conclude that the project would not make a cumulatively considerable contribution to global climate change. If the County adopts a GHG reduction strategy that meets the criteria under CEQA Guidelines Section 15183.5(b), projects may comply with that GHG reduction strategy in lieu of implementing the BAAQMD project-level land use thresholds stated above.	
Noise		
Impact NOI-1. Construction activities associated with development facilitated by the project could result in noise level increases that would exceed applicable construction noise standards at nearby noise sensitive receivers. Operational noise impacts from HVAC units and generators would potentially exceed County standards if located near noise-sensitive land uses. These would be significant impacts and mitigation measures would be required.	**NOI-1 General Construction Activities Noise Reduction Measures.** If construction activities occur during nighttime hours as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation, within 0.5 mile of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), the following measures shall be implemented: 1. Nighttime construction noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m. 2. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis. 3. The analysis of nighttime construction activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider the type of construction equipment to be used and the potential noise levels at noise-sensitive receivers located within 0.5 mile of the Rezoning Site. 4. Provided the nighttime construction noise analysis determines that nighttime noise levels will not exceed 45 dBA L50, 50 dBA L25, 55 dBA L08, or 60 dBA L02 between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures.	Less than significant

Impact	Mitigation Measure (s)	Residual Impact

5. Provided the nighttime construction noise analysis determines that nighttime noise levels would exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers or performing activities at a further distance from the noise-sensitive land use.

NOI-2 Pile Driver Noise and Vibration Reduction Measures. If pile driving activities occur within 2.8 miles of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), or, during daytime or nighttime hours, within 160 feet of a vibration-sensitive receiver (residences, research and advanced technology equipment), the following measures shall be implemented:

1. Daytime (7 a.m. to 10 p.m.)
    a. Pile Driving Vibration
        i. Use of a pile driver shall not occur within 160 feet of a vibration-sensitive receiver;
        ii. Daytime pile driving vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers
2. Nighttime (10 p.m. to 7 a.m.):
    a. Pile Driving Noise
        i. Nighttime pile driving noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m.
        ii. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis.
        iii. The analysis of nighttime pile driving activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider the type of pile driver to be used and potential noise levels at noise-sensitive receivers located within 15,000 feet of the Rezoning Site.
        iv. Provided the analysis concludes that noise levels will not exceed 45 dBA L_{50}, 50 dBA L_{25}, 55 dBA L_{08}, or 60 dBA L_{02} between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures.
        v. Provided the analysis concludes that pile driving noise levels exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers to reduce noise levels.
    b. Pile Driving Vibration

Impact	Mitigation Measure (s)	Residual Impact

i. Use of a pile driver shall not occur within 160 feet of a vibration-sensitive receiver.
ii. Nighttime pile driving vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers.
iii. The project applicant shall retain a qualified consultant to prepare a project-specific construction vibration impact analysis.
iv. The analysis of nighttime pile driving vibration shall be completed in accordance with industry standards. The analysis shall consider the type of pile driver to be used and potential vibration levels at vibration-sensitive receivers located within 160 feet of the Rezoning Site.
v. Provided the analysis concludes vibration levels do not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, construction may proceed without additional measures.
vi. Provided the analysis concludes that pile driving vibration levels exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, additional measures shall be implemented to reduce vibration levels below the standard. These measures may include, but not be limited to, pre-drilling pile holes, utilizing a vibratory pile driver, or performing pile driving at a further distance from the noise-sensitive land use to reduce vibration levels.

NOI-3 Breaker Noise Reduction Measures. If construction activities use a breaker noise during nighttime hours as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation, within 0.5 mile of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), one of the following measures shall be implemented:

1. Nighttime breaker noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m.
2. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis.
3. The analysis of nighttime breaker activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider type of breaker used and other factors of the environment and the potential noise levels at noise-sensitive receivers located within 0.5 mile of the Rezoning Site.

Impact	Mitigation Measure (s)	Residual Impact
	4. Provided the nighttime breaker noise analysis determines that nighttime noise levels will not exceed 45 dBA L_{50}, 50 dBA L_{25}, 55 dBA L_{08}, or 60 dBA L_{02} between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures. 5. Provided the nighttime breaker noise analysis determines that nighttime noise levels would exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers or performing breaking at a further distance from the noise-sensitive land use. **NOI-4 Blasting Noise and Vibration Reduction Measures.** If construction activities using blasting occurs during construction ~~of~~ on a Rezoning Site, the following measure shall be implemented: 1. Daytime (7 a.m. to 10 p.m.) a. Blasting Vibration i. Daytime blasting vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers 2. Nighttime (as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation: a. Blasting Noise ii. Nighttime blasting noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m. iii. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis. iv. The analysis of nighttime blasting activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider the blasting plan and potential noise levels at noise-sensitive receivers located within 0.25 mile of the Rezoning Site. v. Provided the analysis concludes that noise levels will not exceed 45 dBA L_{50}, 50 dBA L_{25}, 55 dBA L_{08}, or 60 dBA L_{02} between the hours of 10 p.m. to 7 a.m. construction may proceed without additional measures. vi. Provided the analysis concludes that pile driving noise levels exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers to reduce noise levels. b. Blasting Vibration	

Impact	Mitigation Measure (s)	Residual Impact

i. Nighttime blasting vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers within 0.25 mile feet of the Rezoning Site.

ii. The project applicant shall retain a qualified consultant to prepare a project-specific construction vibration impact analysis.

iii. The analysis of nighttime blasting vibration shall be completed in accordance with industry standards. The analysis shall consider the blasting plan and potential vibration levels at vibration-sensitive receivers located within 0.25 mile of the Rezoning Site.

iv. Provided the analysis concludes vibration levels do not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, blasting may proceed without additional measures.

v. Provided the analysis concludes that pile driving vibration levels exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, additional measures shall be implemented to reduce vibration levels below the standard. These measures may include, but not be limited to, blasting mats shall be implemented to reduce vibration levels below the threshold.

NOI-5 HVAC Noise Reduction Measures. For any individual project on a Rezoning Site that would place one or more HVAC unit(s) within 30 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of the HVAC unit(s) shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses, listed in Table 4.13 4. The analysis shall be completed in accordance with the County's current Guidelines for the Preparation of Noise Analysis. Noise control measures shall include, but are not limited to, the selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.

NOI-6 Generator Noise Reduction Measures. If an individual project on a Rezoning Site would place permanent backup generators within 300 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of generators shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses, listed in Table 4.13 4. The analysis shall be completed in accordance with the County's current Guidelines for the Preparation of Noise Analysis.

Impact	Mitigation Measure (s)	Residual Impact
	Project specific noise reduction measures shall be implemented into the design plan during construction by the project applicant. Noise control measures that could be implemented include, but are not limited to, the selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.	
Tribal Cultural Resources		
Impact TCR-1. Development facilitated by the project has the potential to impact tribal cultural resources.	**TCR-1 Tribal Cultural Resources Consultation.** If during the implementation of Mitigation Measure CUL-1, archival research results in the identification of an association between a historical built-environment resource and a local (traditionally and culturally affiliated) California Native American tribe, the qualified architectural historian or historian shall confer with the local California Native American tribe(s) on the implementation of Mitigation Measure CUL-2. Throughout the implementation of Mitigation Measures CUL-3 through CUL-9, the qualified archaeologist retained to implement the measures shall confer with local California Native American tribe(s) on the identification and treatment of tribal cultural resources and/or resources of Native American origin not yet determined to be tribal cultural resources through AB 52 consultation. If, during the implementation of Mitigation Measures CUL-3 through CUL-9, a resource of Native American origin is identified, the County shall be notified immediately in order to open consultation with the appropriate local California Native American tribe(s) to discuss whether the resource meets the definition of a tribal cultural resource. **TCR-2 Avoidance of Tribal Cultural Resources.** Development facilitated by the project <u>on Rezoning Sites</u> shall be designed to avoid known tribal cultural resources. Any tribal cultural resource within 60 feet of planned construction activities shall be fenced off to ensure avoidance. The feasibility of avoidance of tribal cultural resources shall be determined by the County and applicant in consultation with local (traditionally and culturally affiliated) California Native American tribe(s). **TCR-3 Tribal Cultural Resources Plan.** A tribal cultural resources Plan shall be required for Rezoning Sites identified as potentially sensitive for tribal cultural resources during consultation with local (traditionally and culturally affiliated) California Native American tribe(s) during the implementation of TCR-1 and/or by the qualified archaeologist during the implementation of CUL-3 through CUL-9. Prior to any development facilitated by the project that would include ground disturbance, the project applicant or its consultant shall prepare a tribal cultural resources treatment plan to be implemented in the event an unanticipated archaeological resource that may be considered a tribal cultural resource is identified during construction. The plan shall include any necessary monitoring requirements, suspension of all earth-disturbing work in the vicinity of the find, avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	outline the appropriate treatment of the resource in coordination with the local Native Americans and, if applicable, a qualified archaeologist. Examples of appropriate treatment for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, and heritage recovery. As appropriate, the tribal cultural resources treatment plan may be combined with any Extended Phase I, Phase II, and/or Phase III work plans or archaeological monitoring plans prepared for work carried out during the implementation of Mitigation Measures CUL-4, CUL-6, CUL-7, or CUL-8. The plan shall be reviewed and approved by the County and the appropriate local California Native American tribe(s) prior to construction to confirm compliance with this measure. **TCR-4 Native American Monitoring.** For Rezoning Sites identified as potentially sensitive for tribal cultural resources through consultation with local California Native American tribe(s) during the implementation of TCR-1, and/or identified as sensitive for cultural resources of Native American origin by the qualified archaeologist during the implementation of CUL-3 through CUL-9, the project applicant shall retain a traditionally and culturally affiliated Native American monitor to observe all ground disturbance, including archaeological excavation, associated with development facilitated by the project. Monitoring methods and requirements shall be outlined in a tribal cultural resources treatment plan prepared under Mitigation Measure TCR-3. In the event of a discovery of tribal cultural resources, the steps identified in the tribal cultural resources plan prepared under Mitigation Measure TCR-3 shall be implemented. **TCR-5 Sensitive Location of Human Remains.** For any development facilitated by the project <u>on Rezoning Sites</u> where human remains are expected to be present based on the results of tribal consultation during the implementation of TCR-1 and/or as identified by the qualified archaeologist, the County shall consult with local California Native American tribe(s) on the decision to employ a canine forensics team. If appropriate, the County shall require the use of a canine forensics team to attempt to identify human remains in a noninvasive way (e.g., non-excavation) for the purpose of avoidance, if avoidance is feasible (see Mitigation Measure TCR-2). Any requirements for the use of a canine forensics team shall be documented in the tribal cultural resources treatment plan prepared under Mitigation Measure TCR-3. Pending the results of any canine investigations, the tribal cultural resources treatment plan may require revision or an addendum to reflect additional recommendations or requirements if human remains are present.	
Utilities		
Impact UTIL-1. Impacts related to stormwater drainage, electric	**UTIL-1 Water and Wastewater Provider Capacity.** Future development proposed on the following sites shall be	Significant and Unavoidable

Impact	Mitigation Measure (s)	Residual Impact
power, natural gas, and telecommunication infrastructure would be less than significant. Impacts related to water and wastewater facilities would be significant due to Rezoning Sites that are not located adjacent to existing wastewater collection infrastructure; impacts would be less than significant with implementation of mitigation measures. However, water supply impacts would be significant and unavoidable, even with implementation of mitigation measures.	required to demonstrate that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary improvements to serve a Rezoning Site will be made prior to occupancy: 1. Rezoning Sites that need to demonstrate capacity from the applicable water service provider: GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4. 2. Rezoning Sites that need to demonstrate capacity from the applicable wastewater service provider GEY-1, GUE-2, GUE-3, LAR-1 through LAR-8, FOR-1, FOR-2, FOR-6, GRA-4, SAN-6, SAN-7, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4. 3. Rezoning Site GRA-4 shall be annexed into the Graton Community Services District prior to development of the site. The required documentation shall be provided to the County during the plan review and permit approval process for projects on the above-listed Rezoning Sites.	
Wildfire		
Impact WFR-2. The project includes Rezoning Sites that are in or near Moderate, High, and Very High FHSZs. Development facilitated by the project would expose project occupants and structures to wildfire risks for sites located in or near (within 2 miles of) SRAs or Very High FHSZs.	**WFR-1 Construction Wildfire Risk Reduction.** The County of Sonoma shall require the following measures during project construction on Rezoning Sites: 1. Construction activities with potential to ignite wildfires shall be prohibited during red-flag warnings issued by the National Weather Service for the site. Example activities include welding and grinding outside of enclosed buildings. 2. Fire extinguishers shall be available onsite during project construction. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher. 3. Construction equipment powered by internal combustion engines shall be equipped with spark arresters. The spark arresters shall be maintained pursuant to manufacturer recommendations to ensure adequate performance. At the County's discretion, additional wildfire risk reduction requirements may be required during construction. The County shall review and approve the project-specific methods to be employed prior to building permit approval. **WFR-2 Landscape Plan Wildfire Risk Reduction.** Project landscape plans for projects on Rezoning Sites shall include fire-resistant vegetation native to Sonoma County and/or the local microclimate of the site and prohibit the use of fire-prone species, especially non-native, invasive species. **WFR-3 New Structure Locations.** Prior to finalizing site plans, proposed structure locations shall, to the extent feasible given site constraints, meet the following criteria:	Significant and Unavoidable

Impact	Mitigation Measure (s)	Residual Impact
	1. Located outside of known landslide-susceptible areas; and 2. Located at least 50 feet from sloped hillsides. If the location meets the above criteria, no additional measures are necessary. If the location is within a known landslide area or within 50 feet of a sloped hillside, structural engineering features shall be incorporated into the design of the structure to reduce the risk of damage to the structure from post-fire slope instability resulting in landslides or flooding. These features shall be recommended by a qualified engineer and approved by the County prior to the building permit approval.	

Section 2, Project Description

Page 2-4:

"In 2020, Permit Sonoma initiated the EIR process for the Rezoning Sites for Housing Project."

Page 2-5:

Program 15d would revise the by-right allowance for cottage housing development from three units to four units per parcel before a use permit is required.

The Housing Element contains various other programs, including Program 4c, which states the County has identified the existing County administrative center campus as able to accommodate future housing. Implementation of this program would be subject to future CEQA review. In addition, Program 4b states the County will rezone the 30.32 acres of land, located at Guerneville Road and Lance Drive, within an unincorporated island in the City of Santa Rosa to match the prezoning and the North Station Area Specific Plan adopted by the City following certification of an EIR for the North Station Area Specific Plan. Implementation of this program will also be done in compliance with CEQA.

Page 2-5:

"As shown in Table 2-1, Sonoma County's RHNA allocation for the 2023-2031 planning period is 3,824 units, which is distributed among four income categories (ABAG 2022~~1~~). For the last (5th) RHNA cycle, the County's final unit allocation was 515 units.

Page 2-6:

Table 2-1 RHNA Allocation and Percentage of Income Distribution for Sonoma County

Income Level	Percent of Area Median Income	Units	Percent
Very Low	0-50%	1,024	27%
Low	51-80%	584	15%
Moderate	81-120%	627	16%
Above Moderate	>120%	1,589	42%
Total	--	3,824	**100%**

Source: ABAG 2022~~1~~

… Sonoma County has identified 79 total sites proposed for the 6th cycle Housing Element site inventory that would satisfy the RHNA allocation… All 59 Rezoning Sites are within General Plan-designated Urban Service Areas,[1] and, if near incorporated areas, within voter-approved Urban Growth Boundaries.[2]

Page 2-7, Table 2-2:

Site ID	Site Address	Assessor's Parcel Number	Nearest Community	Corresponding Figure No.	Rezone Site?
GEY-1	21837 Geyserville Avenue	140-180-035	Geyserville	2-3~~2~~ 2	Yes
GEY-2	No address ~~21404 Geyserville Avenue~~	140-150-0~~08~~22, 140-150-023, 140-150-024, 140-150-025, 140-150-026, 140-150-027	Geyserville	2-3~~2~~ 2	Yes
GEY-3	21413 Geyserville Avenue	140-150-004	Geyserville	2-3~~2~~ 2	Yes
GEY-4	21421 Geyserville Avenue	140-150-001	Geyserville	2-3~~2~~ 2	Yes
GEY-5	80 Highway 128	140-100-004	Geyserville	2-3~~2~~ 2	No
GEY-6	21322 Geyserville Avenue	140-150-012	Geyserville	2-3~~2~~ 2	No
GEY-7	Geyser Ridge	140-160-011	Geyserville	2-3~~2~~ 2	No
GUE-1	14156 Sunset Avenue	070-070-040	Guerneville	2-4~~2~~ 3	Yes
GUE-2	16450 Laughlin Road	069-270-002	Guerneville	2-4~~2~~ 3	Yes
GUE-3	16500 Cutten Court	069-280-043	Guerneville	2-4~~2~~ 3	Yes
GUE-4	16050 Laughlin Road	069-230-007	Guerneville	2-4~~2~~ 3	Yes
GUE-5	16451 River Road	071-180-014	Guerneville	2-4~~2~~ 3	No
GUE-6	17081 CA-116	071-200-003	Guerneville	2-4~~2~~ 3	No
LAR-1	5146 Old Redwood Highway	039-320-051	Larkfield	2-5~~2~~ 4	Yes
LAR-2	201 Wikiup Drive	039-040-040	Larkfield	2-5~~2~~ 4	Yes
LAR-3	1 Airport Boulevard	039-025-060	Larkfield	2-5~~2~~ 4	Yes
LAR-4	245 Airport Boulevard	039-025-026	Larkfield	2-5~~2~~ 4	Yes
LAR-5	175 Airport Boulevard	039-025-028	Larkfield	2-5~~2~~ 4	Yes
LAR-6	145 Wikiup Drive	039-040-035	Larkfield	2-5~~2~~ 4	Yes
LAR-7	5495 Old Redwood Highway	039-380-018	Larkfield	2-5~~2~~ 4	Yes
LAR-8	5224 Old Redwood Highway	039-390-022	Larkfield	2-5~~2~~ 4	Yes
LAR-9	5200 Fulton Road	039-025-053	Larkfield	2-5~~2~~ 4	No
LAR-10	5368 Fulton Road	039-380-027	Larkfield	2-5~~2~~ 4	No
FOR-1	6555 Covey Road	083-073-017	Forestville	2-6~~2~~ 5	Yes
FOR-2	6898 Nolan Road	083-120-062	Forestville	2-6~~2~~ 5	Yes
FOR-3	~~6220 Highway 116 N~~ 6194 Forestville Street	084-020-004	Forestville	2-6~~2~~ 5	Yes
FOR-4	6090 Van Keppel Road[1]	083-073-010	Forestville	2-6~~2~~ 5	Yes
FOR-5	6475 Packing House Road	084-020-003	Forestville	2-6~~2~~ 5	Yes
FOR-6	6250 Forestville Street	084-020-011	Forestville	2-6~~2~~ 5	Yes
FOR-7	Mirabel Road and Highway 116	083-090-085	Forestville	2-6~~2~~ 5	No

Site ID	Site Address	Assessor's Parcel Number	Nearest Community	Corresponding Figure No.	Rezone Site?
GRA-1	9001 Donald Street	130-165-001	Graton	2-7~~2-6~~	Yes
GRA-2	3400 Ross Road	130-090-009	Graton	2-7~~2-6~~	Yes
GRA-3	3155 Frei Road	130-180-079	Graton	2-7~~2-6~~	Yes
GRA-4	3280 Hicks Road	130-146-003	Graton	2-7~~2-6~~	Yes
GRA-5	8525 Graton Road	130-176-013	Graton	2-7~~2-6~~	Yes
SAN-1	3525 Brooks Avenue	134-132-057	South Santa Rosa	2-8~~2-7~~	Yes
SAN-2	298 W Robles Avenue	134-111-068	South Santa Rosa	2-8~~2-7~~	Yes
SAN-3	3569 Brooks Avenue	134-132-056	South Santa Rosa	2-8~~2-7~~	Yes
SAN-4	3345 Santa Rosa Avenue	043-153-021	South Santa Rosa	2-8~~2-7~~	Yes
SAN-5	3509 Brooks Avenue	134-132-034	South Santa Rosa	2-8~~2-7~~	Yes
SAN-6	3824 Dutton Avenue	134-072-040	South Santa Rosa	2-8~~2-7~~	Yes
SAN-7	3280 Dutton Avenue	134-072-038	South Santa Rosa	2-8~~2-7~~	Yes
SAN-8	3427 Moorland Avenue	134-111-020	South Santa Rosa	2-8~~2-7~~	Yes
SAN-9	150 Todd Road	134-171-059	South Santa Rosa	2-8~~2-7~~	Yes
SAN-10	4020 Santa Rosa Avenue	134-192-016	South Santa Rosa	2-8~~2-7~~	Yes
SAN-11	3372 Santa Rosa Avenue	044-101-023	Santa Rosa	2-8~~2-7~~	No
SAN-12	358 E Robles Avenue	134-132-022	Santa Rosa	2-8~~2-7~~	No
SAN-13	~~3847 Santa Rosa Avenue~~ 3855 Santa Rosa Avenue	134-181-046	Santa Rosa	2-8~~2-7~~	No
SAN-14	~~3847 Santa Rosa Avenue~~ 3845 Santa Rosa Avenue	134-181-047	Santa Rosa	2-8~~2-7~~	No
SAN-15	3454 Santa Rosa Avenue	134-132-017	Santa Rosa	2-8~~2-7~~	No
SAN-16	~~3445 Brooks Avenue~~ 3452 Brooks Avenue	134-132-067	Santa Rosa	2-8~~2-7~~	No
SAN-17	388 E Robles Avenue	134-132-025	Santa Rosa	2-8~~2-7~~	No
SAN-18	No Address	036-111-009	Santa Rosa	2-8	No
SAN-19	No Address	036-111-010	Santa Rosa	2-8	No
SAN-20	No Address	036-111-016	Santa Rosa	2-8	No
GLE-1	950 & 987 Carquinez Avenue 136651 & 13675 Arnold Drive	054-290-057	Glen Ellen	2-9~~2-8~~	Yes
GLE-2	No Address	054-290-084	Glen Ellen	2-9~~2-8~~	Yes
GLE-3	15000 Arnold Dr	054-090-001	Glen Ellen	2-9	
GLE-4	14785 Arnold Dr	054-150-005	Glen Ellen	2-9	
AGU-1	188 Academy Lane	056-531-005	Agua Caliente	2-10~~2-9~~	Yes
AGU-2	211 Old Maple Avenue	056-531-006	Agua Caliente	2-10~~2-9~~	Yes
AGU-3	18621 Railroad Avenue	052-272-011	Agua Caliente	2-10~~2-9~~	Yes
AGU-4	17881 Riverside Drive	133-150-038	Agua Caliente	2-10~~2-9~~	No
PEN-1	10078 Main Street	047-174-009	Penngrove	2-11~~2-10~~	Yes

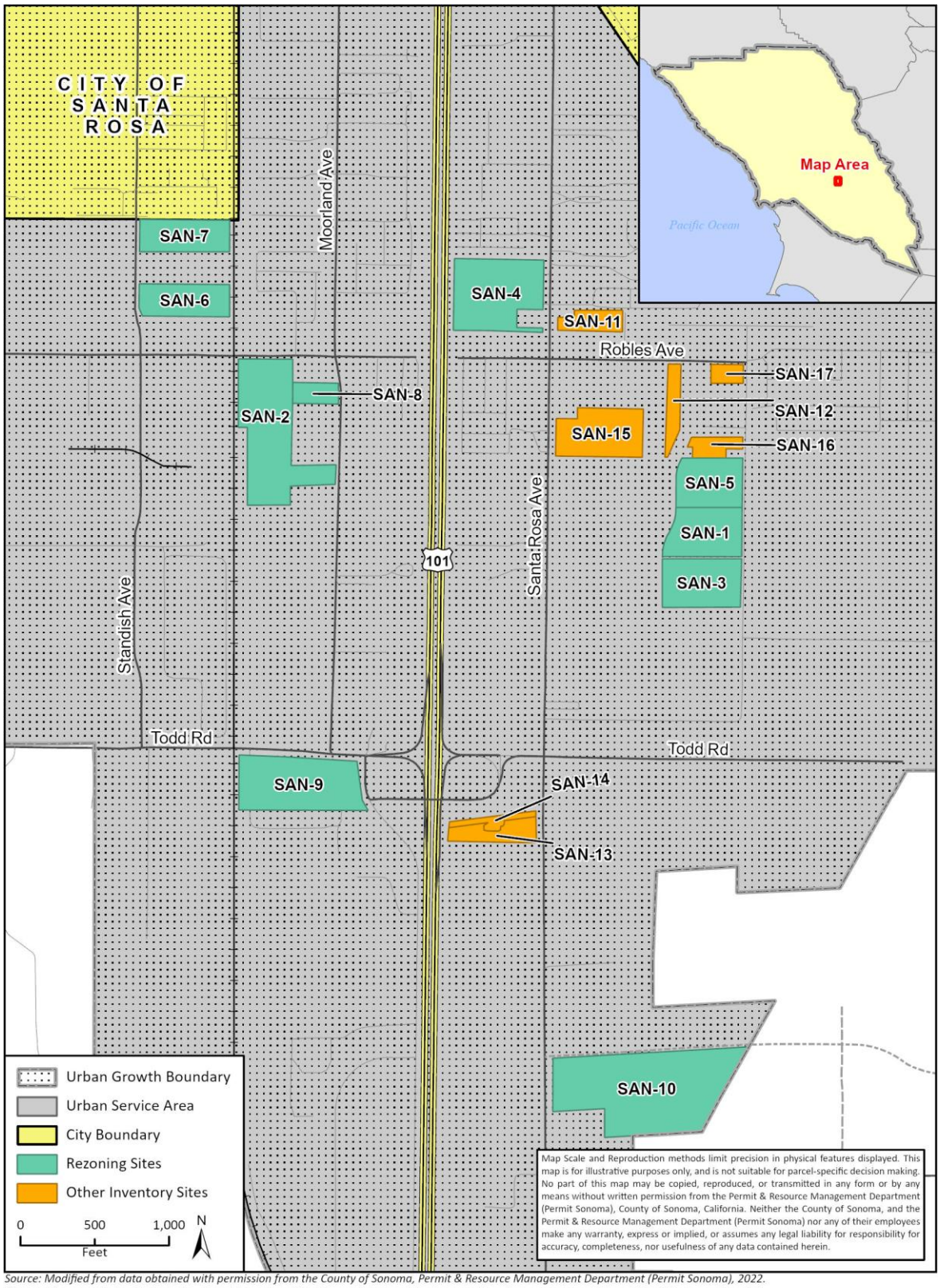
Site ID	Site Address	Assessor's Parcel Number	Nearest Community	Corresponding Figure No.	Rezone Site?
PEN-2	635 Goodwin Avenue ~~No Address~~	047-152-020	Penngrove	2-11~~2-10~~	Yes
PEN-3	10070, 10078, 11790 Main Street	047-174-008	Penngrove	2-11~~2-10~~	Yes
PEN-4	635 Goodwin Avenue ~~No Address~~	047-152-019	Penngrove	2-11~~2-10~~	Yes
PEN-5	No address ~~361 Woodward Avenue~~	047-173-028, 047-173-029~~011~~	Penngrove	2-11~~2-10~~	Yes
PEN-6	355 Adobe Road	047-091-013	Penngrove	2-11~~2-10~~	Yes
PEN-7	220 Hatchery Road	047-153-004	Penngrove	2-11~~2-10~~	Yes
PEN-8	202 ~~206 & 11790~~ Main Street	047-166-023	Penngrove	2-11~~2-10~~	Yes
PEN-9	11830 Main Street	047-166-025	Penngrove	2-11~~2-10~~	Yes
PEN-10	10004 Main Street	047-173-016	Penngrove	2-11~~2-10~~	No
PEN-11	5500 Old Redwood Highway	047-213-009	Penngrove	2-11~~2-10~~	No
PEN-12	Old Redwood Highway	047-213-010	Penngrove	2-11~~2-10~~	No
PET-1	1085 Bodega Avenue	019-090-003	Petaluma	2-12~~2-11~~	Yes
PET-2	1105 Bodega Avenue	019-090-053	Petaluma	2-12~~2-11~~	Yes
PET-3	1155 Bodega Avenue	019-090-004	Petaluma	2-12~~2-11~~	Yes
PET-4	1002 Bodega Avenue	019-090-058	Petaluma	2-12~~2-11~~	Yes
SON-1	20549 Broadway	128-311-015	Sonoma	2-13~~2-12~~	Yes
SON-2	20561 & 20531 Broadway	128-311-016	Sonoma	2-13~~2-12~~	Yes
SON-3	20535 & 20539 Broadway	128-311-014	Sonoma	2-13~~2-12~~	Yes
SON-4	20563 Broadway	128-311-017	Sonoma	2-13~~2-12~~	Yes
ELD-1	15577 Brookview Dr	054-381-010	Eldridge	2-14~~2-13~~	No

[1] An address of 6325 Van Keppel Road is also associated with this property, as an address correction was filed in January 2023.

Page 2-9:

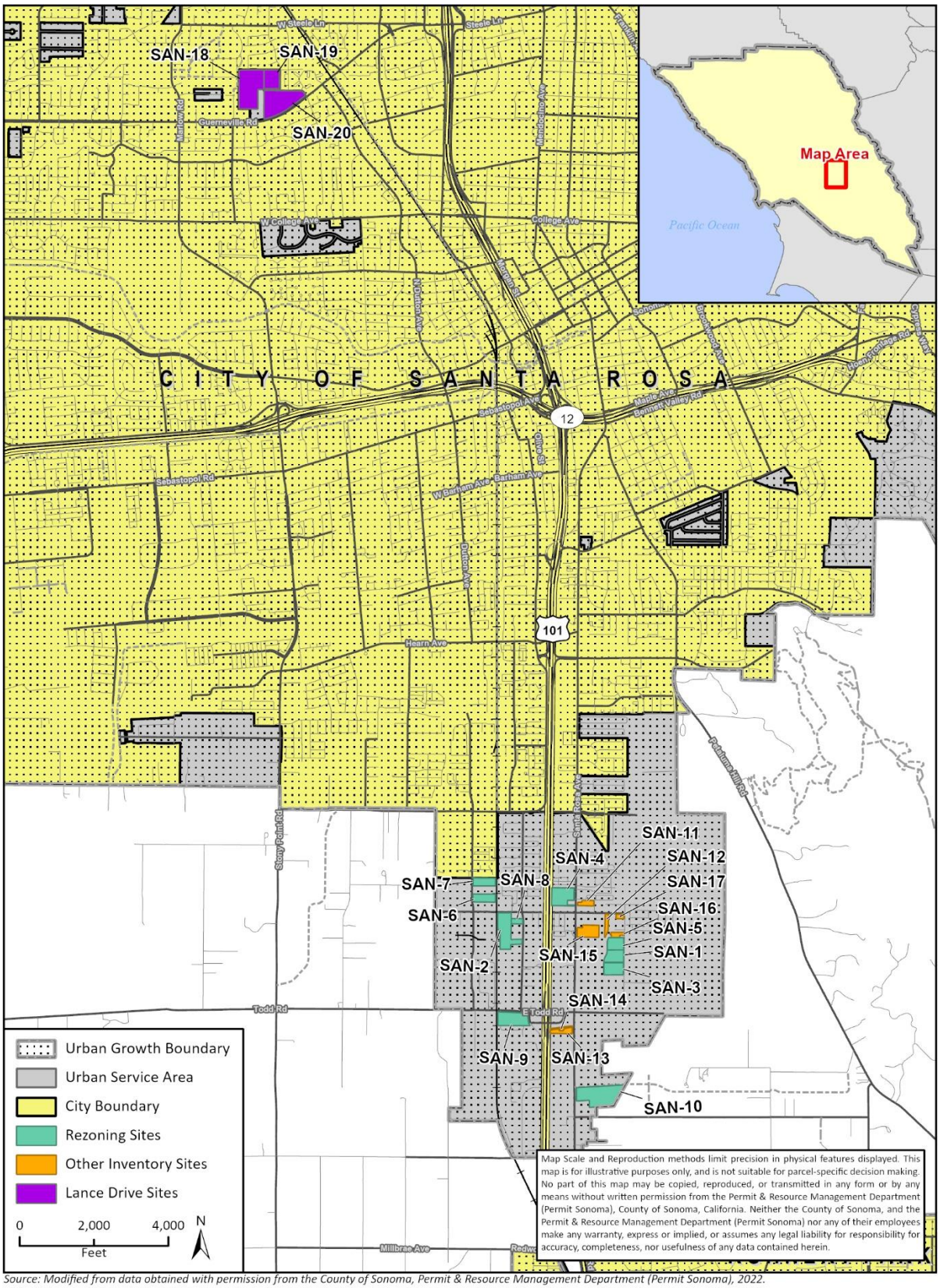
The Sonoma County Housing Element Update would rezone up to 59 urban sites in General Plan-designated Urban Service Areas throughout unincorporated Sonoma County (as identified in Table 2-2) for by-right, ~~medium~~high-density housing. By-right, ~~medium~~high-density housing means that no discretionary land use approvals and no CEQA review would be required for the development of ~~medium~~high-density (up to 24 units per acre) housing on the sites. Design review approval for consistency with objective design standards is required for all multi-family or mixed-use housing development of more than three units.

Page 2-16, Figure 2-8:



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma), 2022.
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri.

(figure removed)



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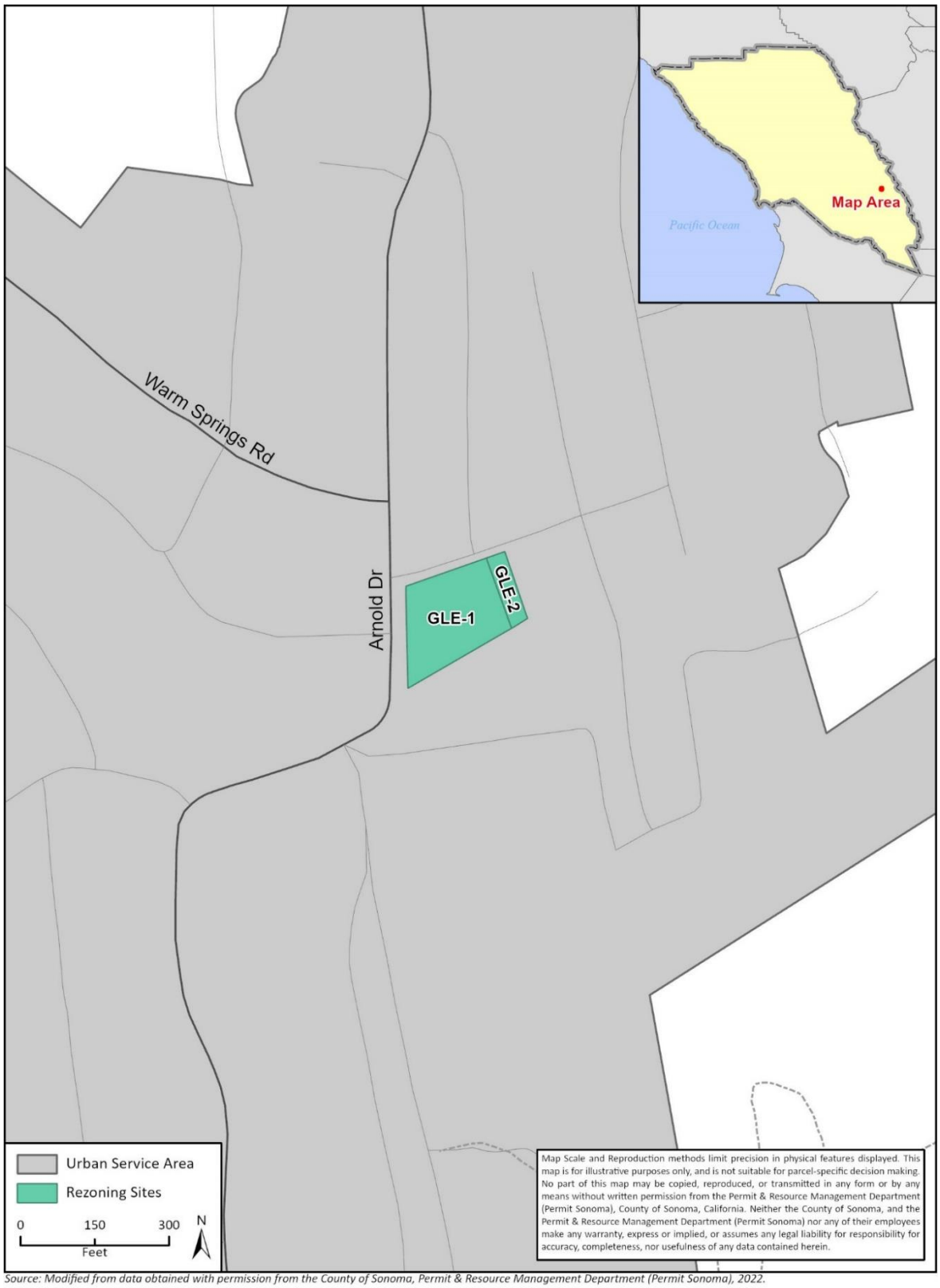
Page 2-17, Figure 2-9:



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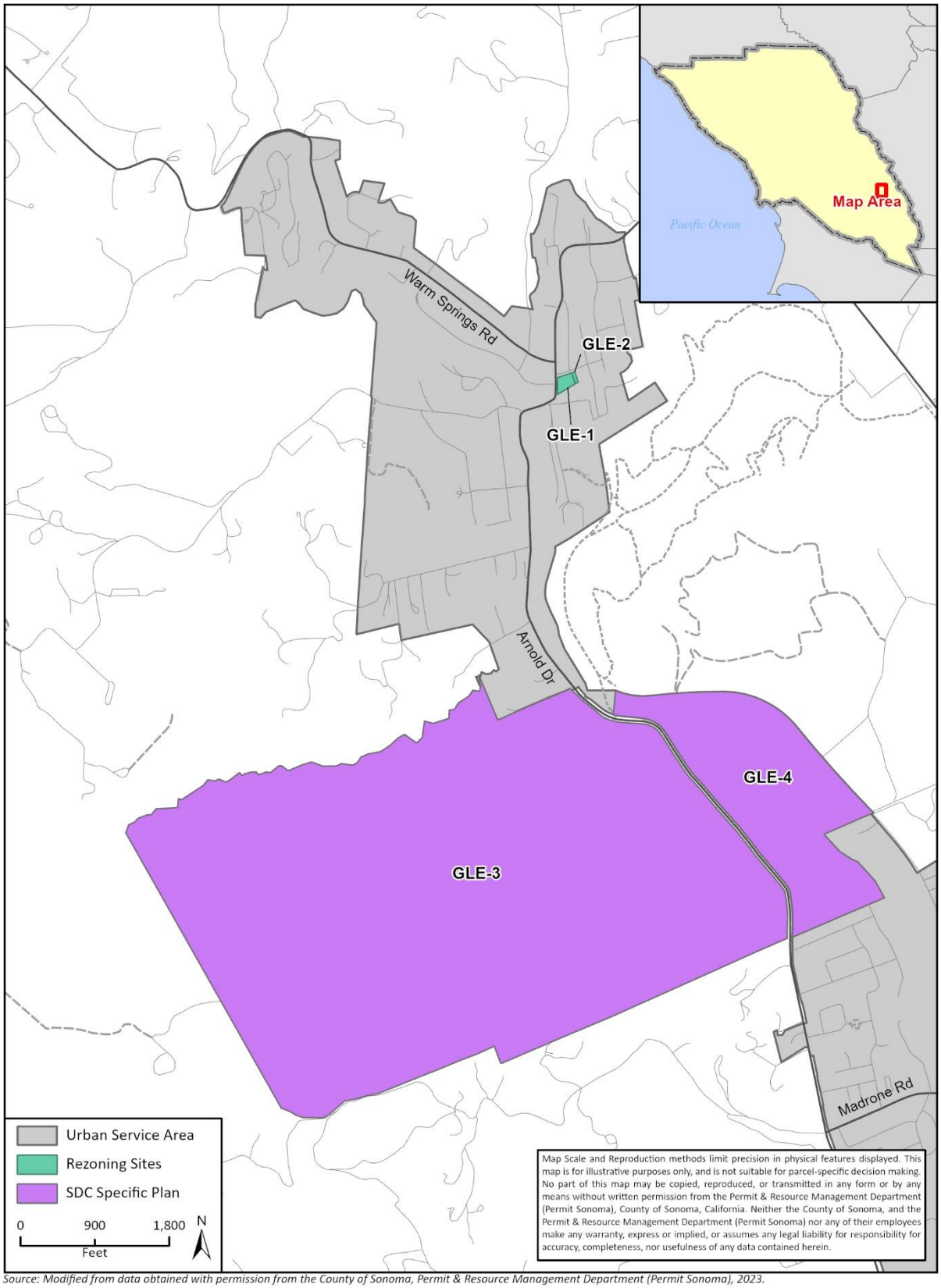

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(figure added)

Page 2-23:

For purposes of the environmental analysis, sites were analyzed for rezoning to R2, with a base density of 10 or 11 units per acre and assuming application of the Rental Housing Opportunity Program, as well as rezoning to R3 with a density of 20 units per acre; both were assumed to be rezoned to allow a density of 20 or 22 units per acre, respectively, which represents the maximum buildout potential utilizing the County's Rental Housing Opportunity Area program, which automatically doubles the site density for projects proposing to include at least 40 percent of units as affordable. Sites analyzed for rezoning to add the WH Combining District were assumed to allow a density of 20-24 units per acre, the maximum allowed in this district.

Page 2-23, Table 2-3:

Site(s)	Proposed Modification to General Plan Land Use Designation and Density[1] (units/acre)	Proposed New Base Zoning Districts and/or Addition of WH Combining District	~~Maximum~~Number of dwelling units allowed per acre[2]
GEY-1	UR 20 ~~10~~	R3 ~~R2~~	20
GEY-2	UR 10	R2	20
GEY-3	UR 20~~10~~	R3 ~~R2~~	20
GEY-4	UR 20~~10~~	R3 ~~R2~~	20
GUE-1	UR 20~~10~~	R3 ~~R2~~	20
GUE-2	UR 20~~10~~	R3 ~~R2~~	20
GUE-3	UR 20~~10~~	R3 ~~R2~~	20
GUE-4	UR 20~~10~~	R3 ~~R2~~	20
LAR-1	UR 20~~11~~	R3 ~~R2~~	20 ~~22~~
LAR-2	UR 20~~11~~	R3 ~~R2~~	20~~22~~
LAR-3	UR 20~~11~~	R3 ~~R2~~	20~~22~~
LAR-4	UR 20~~11~~	R3 ~~R2~~	20~~22~~
LAR-5	UR 20~~11~~	R3 ~~R2~~	20~~22~~
LAR-6	UR 20~~11~~	R3 ~~R2~~	20~~22~~
LAR-7	UR 20	R3 ~~R2~~	20~~22~~
LAR-8	No change	Add WH	24
FOR-1	UR 20 ~~No change~~	R3~~Add WH~~	20~~24~~
FOR-2	UR 20~~10~~	R3 ~~R2~~	20
FOR-3	UR 20~~10~~	R3 ~~R2~~	20
FOR-4	UR 20~~10~~	R3 ~~R2~~	20
FOR-5	UR 20~~10~~	R3 ~~R2~~	20
FOR-6	UR 20~~10~~	R3 ~~R2~~	20
GRA-1	UR 20~~10~~	R3 ~~R2~~	20
GRA-2	No change	Add WH	24
GRA-3	UR 20~~10~~	R3 ~~R2~~	20
GRA-4	UR 20~~10~~	R3 ~~R2~~	20
GRA-5	UR 20~~10~~	R3 ~~R2~~	20
SAN-1	UR 20~~10~~	R3 ~~R2~~	20
SAN-2	LI	M1, Add WH	24

Site(s)	Proposed Modification to General Plan Land Use Designation and Density[1] (units/acre)	Proposed New Base Zoning Districts and/or Addition of WH Combining District	~~Maximum~~Number of dwelling units allowed per acre[2]
SAN-3	UR 20~~10~~	R3 ~~R2~~	20
SAN-4	LC	LC, Add WH	24
SAN-5	UR 20~~10~~	R3 ~~R2~~	20
SAN-6	No change	Add WH	24
SAN-7	No change	Add WH	24
SAN-8	UR 20~~10~~	R3 ~~R2~~	20
SAN-9	No change	Add WH	24
SAN-10	No change	Add WH	24
GLE-1	No change	Add WH	24
GLE-2	No change	Add WH	24
AGU-1	UR 20~~10~~	R3 ~~R2~~	20
AGU-2	UR 20~~10~~	R3 ~~R2~~	20
AGU-3	UR 20~~10~~	R3 ~~R2~~	20
PEN-1	LC	Add WH	24
PEN-2	UR 20~~10~~	R3 ~~R2~~	20
PEN-3	LC	Add WH	24
PEN-4	UR 20~~10~~	R3 ~~R2~~	20
PEN-5	No change	Add WH	24
PEN-6	UR 20~~10~~	R3 ~~R2~~	20
PEN-7	UR 20~~10~~	R3 ~~R2~~	20
PEN-8	No change	C2, Add WH	24
PEN-9	No change	C2, Add WH	24
PET-1	UR 10	R2	20
PET-2	UR 10	R2	20
PET-3	No change	Add WH	24
PET-4	UR 10	R2	20
SON-1	UR 20~~10~~	R3 ~~R2~~	20
SON-2	UR 20~~10~~	R3 ~~R2~~	20
SON-3	UR 20~~10~~	R3 ~~R2~~	20
SON-4	UR 20~~10~~	R3 ~~R2~~	20

[1] Commercial land use designations do not have associated residential density.

~~[2] The Rental Housing Opportunity Area Program doubles site density for projects with 40 percent affordable units.~~

General Plan Land Use Designations: UR = Urban Residential, LC = Limited Commercial

Zoning Districts: R~~2~~3 = High ~~Medium~~ Density Residential District, WH = Workforce Housing Combining District

Page 2-25:

Table 2-5 identifies the dwelling unit and population buildout potential of the 25~~20~~ additional inventory sites that ~~would not be rezoned~~ do not require rezoning under implementation of the project. If all 59 sites are chosen to move forward in the Housing Element Update as studied under this EIR, project

implementation could increase the housing availability in the County to accommodate up to 3,312 additional dwelling units and approximately 8,246 additional people.[8] The remaining 569 dwelling units required in the County under the 6th cycle RHNA would be accommodated by currently planned and approved units in development, in addition to the number of accessory dwelling units expected to be built in the County through 2031. For the purposes of this EIR, accessory dwelling units are exempt under CEQA and are consistent with the General Plan and zoning as provided in state law, including density.

Table 5-1 Housing Unit and Population Buildout Potential for Rezoning Sites

Rezoning Site	Allowable Dwelling Units Under Current Designation	~~Total~~ Allowable Dwelling Units Under Proposed Designation	Change in ~~Total~~Allowable Dwelling Units (Buildout Potential)	~~Total~~ Population Under Current Designation[1]	~~Total~~ Population Under Proposed Designation[1]	Change in Buildout Population Potential

Page 2-28, Table 2-5:

Other Inventory Site	~~Total~~ Allowable Dwelling Units	Total Population Potential ~~(Based on Maximum Capacity)~~
GEY-5	12	10
GEY-6	12	17
GEY-7	9	10
GUE-5	10	20
GUE-6	10	11
LAR-9	22	66
LAR-10	10	10
FOR-7	10	8
SAN-11	26	32
SAN-12	40	44
SAN-13	10	15
SAN-14	10	7
SAN-15	26	106
SAN-16	40	38
SAN-17	40	30
SAN-18[1]	18-30[2]	324
SAN-19[1]	18	87
SAN-20[1]	30	345
GLE-3	30	200[3]
GLE-4	30	200[3]
AGU-4	10	13
PEN-10	12	16
PEN-11	10	10

[8] Calculation based on 2.6 persons per household in unincorporated Sonoma County (California Department of Finance 2022). See Table 4.14-2 in Section 4.14, *Population and Housing*, for more detail.

Other Inventory Site	~~Total~~ Allowable Dwelling Units	Total Population Potential
PEN-12	10	38
ELD-1	8	10
Total	**337**	**511**

Notes:

[1] Sites included in the North Santa Rosa Station Area Specific Plan, which was adopted in September 2012 and covered in a separate EIR. These sites would require rezoning by the County to match the current City zoning, but this would not change the number of dwelling units allowed.

[2] Site is split-zoned with 6 acres at a density of 30 du/ac and 8 acres at 18 du/ac.

[3] Based on 200-unit buildout projected in Housing Element. Project covered in separate EIR certified December 2022.

Section 4, Environmental Impact Analysis

Page 4-1:

…As detailed in Section 2.6, *Project Characteristics*, these sites would be located within census-designated urbanized areas and urban service areas that are zoned R1 and located outside of both the high and very high fire hazard severity zones. The updated Housing Element also includes a program for rezoning under Senate Bill (SB) 10. Senate Bill 10 provides a streamlined process for local governments to increase residential density up to 10 dwelling units per parcel on eligible parcels, provided the parcel is qualifies under SB 10 as a transit-rich or urban infill site. The Housing Element proposes to allow sites within census-designated urbanized areas or urban clusters and urban service areas that are zoned R1 (Low-Density Residential) and located outside of both the High and Very High Wildfire Hazard Severity Zones to allow additional units based on parcel size. ~~Under the policy detailed in the Housing Element and allowed by SB 10, parcels that meet these criteria would be allowed to build a maximum of X du if they are between 10,000 square feet and 20,000 square feet in size, and a maximum of X du if they are above 20,000 square feet in size.~~ There are over 2,000 sites in unincorporated Sonoma County between 10,000 and 20,000 square feet in size that fit these criteria and 1,000 sites in unincorporated Sonoma County above 20,000 square feet in size that fit these criteria….

Section 4.1, Aesthetics

Page 4.1-12:

Figure 4.1-5a GUE-2 Looking North from Laughlin Road

Figure 4.1-5b ~~GUE-2 and~~ GUE-3 Looking Westward from Cutten Avenue

Source: Google Earth 2020

Page 4.1-19:

Figure 4.1-15 FOR-5 from Packing House Road Looking Southeast

(figure deleted)

(figure added)

Figure 4.1-16 FOR-6 from Forestville Street Looking Southwest

(figure deleted)

(figure added)

Page 4.1-18:

…Views of the ridgelines and open spaces are not visible from the streets looking across the lot due to existing residential development, relatively flat topography, and mature vegetation on all sides (Figure 4.1-14)….

Page 4.1-18:

On Mirabel Road, the Forestville Youth Park ~~a school~~ is directly across the street from FOR-2… FOR-4 is situated east of FOR-1 in an area accessible only by ~~unpaved roads~~ a private driveway off Van Keppel Road.

Page 4.1-18:

…They are situated close to the roadway and are landscape in a varied but unified manner. ~~On Mirabel Road, a school is directly across the street from FOR-2.~~ The residential development on Mirabel Road features a less unified design than that on Giusti Road…

Page 4.1-34:

Figure 4.1-2SAN-10 Viewed from the Southern Boundary, Looking East ~~North~~

Page 4.1-46:

Goal OSRC-6: Preserve the unique rural and natural character of Sonoma County for residents, businesses, visitors, and future generations.

~~**Objective OSRC-6.2:** Establish Rural Character as a primary criterion for review of discretionary projects, but not including administrative design review for single family homes on existing lots outside of Urban Service Areas.~~

~~Policy OSRC-6a: Develop design guidelines for discretionary projects in rural areas, but not including administrative design review for single family homes on existing lots, that protect and reflect the rural character of Sonoma County. Use the following general design principles until these Design Guidelines are adopted, while assuring that Design Guidelines for agricultural support uses on agricultural lands are consistent with Policy AR-9h of the Agricultural Resources Element.~~

~~(1) New structures blend into the surrounding landscape, rather than stand out.~~

~~(2) Landscaping is included and is designed to blend in with the character of the area.~~

~~(3) Paved areas are minimized and allow for informal parking areas.~~

~~(4) Adequate space is provided for natural site amenities.~~

~~(5) Exterior lighting and signage are minimized.~~

Page 4.1-51 through 4.1-53, Table 4.1-6:

Table 4.1-6 Site Impacts and Recommended Mitigation Summary

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
GEY-1	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
GEY-2	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
GEY-3	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
GEY-4	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
GUE-1	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
GUE-2	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
GUE-3	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
GUE-4	Moderate	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
LAR-1	Low	Co-Dominant	Less than significant	~~AES-1,~~ AES-2~~, AES-3, AES-4~~
LAR-2	Low	Co-Dominant	Less than significant	AES-2~~5~~
LAR-3	Low	Co-Dominant	Less than significant	AES-2~~5~~
LAR-4	Low	Co-Dominant	Less than significant	AES-2~~5~~
LAR-5	Low	Co-Dominant	Less than significant	AES-2~~5~~
LAR-6	Low	Co-Dominant	Less than significant	AES-2~~5~~
LAR-7	Moderate	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
LAR-8	Low	Co-Dominant	Less than significant	AES-2~~5~~
FOR-1	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
FOR-2	Moderate	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
FOR-3	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
FOR-4	Moderate	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
FOR-5	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
FOR-6	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
GRA-1	Low	Co-Dominant	Less than significant	AES-2~~5~~
GRA-2	Low	Co-Dominant	Less than significant	AES-2~~5~~
GRA-3	High	Co-Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
GRA-4	Moderate	Co-Dominant	Less than significant	AES-2~~AES-5~~

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
GRA-5	High	Co-Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
SAN-1	Low	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
SAN-2	Low	Co-Dominant	Less than significant	AES-2~~5~~
SAN-3	Low	Dominant	Less than significant	AES-2~~5~~
SAN-4	Low	Co-Dominant	Less than significant	AES-2~~5~~
SAN-5	Low	Dominant	Less than significant	AES-2~~5~~
SAN-6	Low	Co-Dominant	Less than significant	AES-2~~5~~
SAN-7	Low	Co-Dominant	Less than significant	AES-2~~5~~
SAN-8	Low	Co-Dominant	Less than significant	AES-2~~5~~
SAN-9	Low	Co-Dominant	Less than significant	AES-2~~5~~
SAN-10	Low	Co-Dominant	Less than significant	AES-2~~5~~
GLE-1	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
GLE-2	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
AGU-1	Moderate	Co-Dominant	Less than significant	~~AES-1,~~ AES-2~~, AES-5~~
AGU-2	Moderate	Co-Dominant	Less than significant	~~AES-1,~~ AES-2~~, AES-5~~
AGU-3	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
PEN-1	High	Co-Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PEN-2	Moderate	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PEN-3	High	Co-Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PEN-4	Moderate	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PEN-5	High	Co-Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PEN-6	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
PEN-7	Moderate	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PEN-8	High	Co-Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PEN-9	High	Co-Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PET-1	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PET-2	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
PET-3	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
PET-4	High	Dominant	Significant	AES-1, AES-2~~, AES-3, AES-4, AES-5~~
SON-1	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
SON-2	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
SON-3	Moderate	Co-Dominant	Less than significant	AES-2~~5~~
SON-4	Moderate	Co-Dominant	Less than significant	AES-2~~5~~

*The potential impact statement listed in this table coincides with the impact evaluation decision matrix in the County's Visual Assessment Guidelines (2019) and does not apply to every CEQA issue for every site. Potentially significant impacts are indicated for specific sites and mitigation measures reiterated by CEQA issue area.

Section 4.4, Agriculture and Forestry Resources

Page 4.2-17:

Mitigation Measure AG-1 Interim Agricultural Buffers

Development facilitated by the project on the Rezoning Sites adjacent to active agricultural operations shall provide fencing and a minimum buffer of 200 feet to the agricultural operations, consistent with 26-88-040(f) of the Sonoma County Zoning Code. If this distance is not practical due to project design or features, a minimum 100-foot buffer is acceptable if it complies with all of the requirements for a reduced buffer and a vegetative screen is provided as specified in Section 26-88-040(f).

Section 4.3, Air Quality

Page 4.3-9:

Policy OSRC-16h**:** Require that development within the BAAQMD that generates high numbers of vehicle trips, such as shopping centers and business parks, incorporate air quality mitigation measures in their design.

Policy OSRC-16i**:** Ensure that any proposed new sources of toxic air contaminants or odors provide adequate buffers to protect sensitive receptors and comply with applicable health standards. Promote land use compatibility for new development by using buffering techniques such as landscaping, setbacks, and screening in areas where such land uses abut one another.

~~Policy OSRC-16j: Require consideration of odor impacts when evaluating discretionary land uses and development projects near wastewater treatment plant or similar uses.~~

~~Policy OSRC-16k: Require that discretionary projects involving sensitive receptors (facilities or land uses that include members of the population sensitive to the effects of air pollutants such as children, the elderly, and people with illnesses) proposed near the Highway 101 corridor include an analysis of mobile source toxic air contaminant health risks. Project review should, if necessary, identify design mitigation measures to reduce health risks to acceptable levels.~~

Policy OSRC-16l**:** Work with the applicable Air Quality districts to adopt a diesel particulate ordinance. The ordinance should prioritize on site over off site mitigation of diesel particulate emissions to protect neighboring sensitive receptors from these emissions.

Policy OSRC-16m**:** Provide education and outreach to the public regarding the Air Quality Districts' "Spare the Air" Programs.

Page 4.3-19:

AQ-1 Basic Construction Mitigation Measures

All development facilitated by the project on the Rezoning Sites (regardless of whether the development is under the jurisdiction of the SFBAAB or the BAAQMD) shall be required to reduce construction emissions of reactive organic gases, nitrogen oxides, and particulate matter (PM_{10} and $PM_{2.5}$) by implementing the BAAQMD's Basic Construction Mitigation Measures (described below) or equivalent, expanded, or modified measures based on project and site-specific conditions.

AQ-2 Additional Construction Mitigation Measures

In addition to implementation of Mitigation Measure AQ-1, for any project on the Rezoning Sites (regardless of whether the development is under the jurisdiction of the SFBAAB or the BAAQMD) that meets the following conditions and as listed in **Error! Reference source not found.**, the County shall c ondition development facilitated by the project to implement BAAQMD CEQA Air Quality Guidelines' Additional Construction Mitigation Measures:

Section 4.4, Biological Resources

Page 4.4-25-26:

~~Policy OSRC-7k: Require the identification, preservation and protection of native trees and woodlands in the design of discretionary projects, and, to the maximum extent practicable, minimize the removal of native trees and fragmentation of woodlands, require any trees removed to be replaced, preferably on the site, and provide permanent protection of other existing woodlands where replacement planting does not provide adequate mitigation.~~

~~Policy OSRC-7o: Encourage the use of native plant species in landscaping. For discretionary projects, require the use of native or compatible non-native species for landscaping where consistent with fire safety. Prohibit the use of invasive exotic species.~~

~~Policy OSRC-8i: As part of the environmental review process, refer discretionary permit applications near streams to CDFG and other agencies responsible for natural resource protection.~~

Page 4.4-30:

BIO-2 Special Status Plant Species Surveys

If the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) determines that there is potential for ~~significant~~ impacts to federally or state-listed plants or ~~regional population level impacts to~~ species with a CRPR of 1B or 2B from project development, a qualified biologist shall complete surveys for special status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). Surveys shall be conducted following CDFW's 2018 Protocol for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities and, as applicable, the Santa Rosa Plain Conservation Strategy Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain, including, but not limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts, such as altering off-site hydrological conditions where these species may be present, or any formal updates of these protocols. The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species identified in the project-specific biological analysis. All plant surveys shall be conducted by a qualified biologist during the blooming season prior to initial ground disturbance. More than one year of surveys may be required to establish that plants are absent, and the above Santa Rosa Plain Conservation Strategy Appendix D requires a minimum of two years of surveys, which shall be implemented unless otherwise approved in writing by CDFW. All special status plant species identified on site shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the County, and the CDFW and/or USFWS, as appropriate, for review and/or approval. The project shall

obtain written approval of the survey reports from CDFW prior to the start of construction, unless otherwise approved in writing by CDFW. If any special-status plants are observed, the Project shall: 1) avoid all direct and indirect impacts to the special-status plants, and 2) prepare and implement an avoidance plan that is approved in writing by CDFW prior to Project start. If CESA listed plants are observed and impacts cannot be avoided, the Project shall obtain a CESA ITP from CDFW. For impacts to federal Endangered Species Act (ESA) listed plants, the Project shall obtain authorization from USFWS.

Page 4.4-30:

BIO-3 Special Status Plant Species Avoidance, Minimization, and Mitigation

If federally and/or state-listed or CRPR 1B or 2 species are found during special status plant surveys (pursuant to Mitigation Measure BIO-2), and would be directly impacted, or there would be a population-level impact to non-listed sensitive species, then the project shall be re-designed to avoid impacting those plant species. Rare and listed plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm.

For projects on Rezoning Sites in BSAs located within the Santa Rosa Plain Area, protocol rare plant surveys shall be conducted, and impacts to suitable rare plant habitat mitigated, in accordance with the 2007 USFWS Santa Rosa Plain Programmatic Biological Opinion, as amended in 2020.

BIO-4 Restoration, ~~and~~ Monitoring, and Habitat Compensation

Development and/or restoration activities shall be conducted in accordance with a site-specific Habitat Restoration Plan. If federally or state-listed plants or non-listed special status CRPR 1B and 2 plant populations cannot be avoided, and will be impacted by development, all impacts shall be mitigated by the applicant at a ratio not lower than 1:1 and to be determined by the County (in coordination with CDFW and USFWS as ~~and if~~ applicable) for each species as a component of habitat restoration, unless otherwise approved in writing by CDFW. For impacts to state-listed plants, habitat compensation at a minimum 1:1 mitigation to impact ratio shall be provided, which may include either the purchase of credits at a CDFW-approved mitigation or conservation bank or purchasing appropriate habitat and conserving it in perpetuity through a conservation easement and management plan, which shall be prepared, funded, and implemented by the project proponent in perpetuity, unless otherwise approved in writing by CDFW. A qualified biologist shall prepare and submit a restoration plan to the County and CDFW for review and approval. (Note: if a federally and/or state-listed plant species will be impacted, the restoration plan shall be submitted to the USFWS and/or CDFW for review, and federal and/or state take authorization ~~may~~ will be obtained from ~~required by~~ these agencies.) The restoration plan shall include, at a minimum, the following components […]

Page 4.4-31:

BIO-5 Endangered/Threatened Species Habitat Assessments and Protocol Surveys, CDFW and USFWS Authorization and Habitat Compensation

Specific habitat assessments and survey protocols are established for several federally- and state-listed endangered or threatened species. If the results of the project-specific biological analysis determine that suitable habitat may be present for any such species, protocol habitat

assessments/surveys shall be completed in accordance with CDFW, NMFS, and/or USFWS protocols prior to issuance of any construction permits. If projects are located within the Santa Rosa Plain Area, surveys shall be conducted for CTS in accordance with the Santa Rosa Plain Conservation Strategy (2005) with prior written approval from CDFW and USFWS. Due to numerous documented occurrences of CTS in the Santa Rosa Plain in conjunction with the documented dispersal distances for the species of up to 1.3 miles, it has been established that CTS are present within many grassland and vernal pool habitats within the Santa Rosa Plain rendering surveys unnecessary, and therefore any protocol CTS surveys shall be approved in writing by CDFW and USFWS prior to conducting the survey and habitat compensation for impacts to CTS habitat shall be provided by the Project pursuant to the Santa Rosa Plain Conservation Strategy even if survey results are negative, unless otherwise approved in writing by CDFW and USFWS. If impacts to grassland or vernal pool habitat will occur, the Project shall consult with CDFW to determine if a CESA ITP for CTS is warranted. If CESA listed animal species such as CTS cannot be avoided, the Project shall obtain a CESA ITP from CDFW prior to Project construction. For impacts to ESA listed wildlife species such as CTS, the Project shall obtain authorization from USFWS. While often consistent with the Santa Rosa Plain Conservation Strategy, the CESA ITP habitat compensation requirements may differ from it based on a site-specific analysis. If through consultation with the CDFW, NMFS, and/or USFWS it is determined that protocol habitat assessments/surveys are not required, the applicant shall complete and document this consultation and submit it to the County prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they understand the protocol requirements and shall hire a qualified biologist to conduct protocol surveys.

Page 4.4-34 through 36:

BIO-9 American Badger Avoidance And Minimization

For projects located on Rezoning Sites in the Petaluma BSA (PET-1 through PET-4), a qualified biologist shall conduct surveys of the grassland habitat on-site to identify any American badger burrows/dens. These surveys shall be conducted not more than 14 days prior to the start of construction. Impacts to active badger dens shall be avoided by establishing exclusion zones around all active badger dens, within which construction related activities shall be prohibited until denning activities are complete or the den is abandoned. A qualified biologist shall monitor each den once per week in order to track the status of the den and to determine when a den area has been cleared for construction.

BIO-10 Pre-Construction Surveys for Nesting Birds for Construction Occurring within Nesting Season

For projects that require construction, grading, the removal of trees or vegetation, or other project-related improvements, construction activities shall occur outside of the nesting season (September 16 to January 31), and no mitigation activity is required. If construction activities must occur during the nesting season (February 1 to September 15), a qualified biologist shall conduct surveys for nesting birds ~~covered by the CGFC no more than~~ within 14 days prior to project activities ~~vegetation removal~~ and shall conduct additional surveys if there is a lapse of 14 days or more in construction activities. The surveys shall include the entire disturbance area plus at least a ~~200~~ 500-foot buffer

around the project site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of ~~50~~ 250 feet for non-raptor bird species and at least ~~150~~ 500 feet for raptor species, unless determined otherwise by the qualified biologist. Buffer distances for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distances shall be specified to protect the bird's normal behavior thereby preventing nesting failure or abandonment. The buffer distance recommendation shall be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The qualified biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer is established. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. The biologist shall submit a report of these preconstruction nesting bird surveys to the County to document compliance within 30 days of its completion.

…

BIO-12 Invasive Weed Prevention and Management Program

For those projects on Rezoning Sites where activity would occur within or adjacent to sensitive habitats, as determined by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), prior to start of construction a qualified biologist shall develop an Invasive Weed Prevention and Management Plan to prevent invasion of native habitat by non-native plant species. A list of target species shall be included, along with measures for early detection and eradication. All disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas. In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six weeks since ground disturbing activities ceased. If exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a qualified biologist and in accordance with the restoration plan. Landscape species shall not include noxious, invasive, and/or non-native plant species that are recognized on the federal Noxious Weed List, California Noxious Weeds List, and/or California Invasive Plant Council Moderate and High Risk Lists.

Page 4.4-37:

BIO-14 Permitting and Restoration for Impacts to Sensitive Natural Communities, Waters, and Wetlands

Impacts to sensitive natural communities (including riparian areas and waters of the state or waters of the U.S. under the jurisdiction of the CDFW, USFWS, ~~or~~ RWQCB, or USACE) shall require that the Project: 1) submit an LSA Notification to CDFW (for impacts to streams or lakes and associated riparian habitat) and comply with the Final LSA Agreement, and 2) obtain authorization from

RWQCB and the USACE (for impacts to Waters of the U.S. or State including wetlands pursuant to the Clean Water Act). Impacts shall be mitigated as required by agency permits and at a minimum 1:1 mitigation impact ratio through the funding of the acquisition and in-perpetuity management of similar habitat, in-kind credits purchased from a conservation or mitigation bank, or on-site or off-site habitat restoration based on area and linear distance for permanent impacts, unless otherwise approved in writing by the agencies. Temporary impacts shall be restored on-site. The applicant shall provide funding and management of off-site mitigation lands through purchase of credits from an existing, approved mitigation bank or land purchased by the County and placed into a conservation easement or other covenant restricting development (e.g., deed restriction). Internal mitigation lands (internal to the Rezoning Sites), or in lieu funding sufficient to acquire lands, shall provide habitat at a minimum 1:1 ratio for impacted lands, comparable to habitat to be impacted by individual project activity. The applicant shall submit documentation of mitigation funds to the County. Please be advised that CDFW may not accept in-lieu fees as an appropriate method to mitigate impacts to streams or lakes and associated riparian habitat.

1. **Restoration and Monitoring**. If sensitive natural communities cannot be avoided and will be impacted by future projects, a compensatory mitigation program shall be implemented by the applicant in accordance with Mitigation Measure BIO-4 and the measures set forth by the regulatory agencies during the permitting process. All temporary impacts to sensitive natural communities shall be fully restored to natural condition.
2. **Sudden Oak Death**. The applicant shall inspect all nursery plants used in restoration for sudden oak death. Vegetation debris shall be disposed of properly and vehicles and equipment shall be free of soil and vegetation debris before entering natural habitats. Pruning tools shall be sanitized.

Habitat restoration shall occur in the same calendar year as the impact onsite or as close to the site as possible within the same stream or watershed and may consist of restoration or enhancement of riparian habitat. If mitigation is not possible within the same stream or watershed, mitigation ratios may increase at the discretion of CDFW.

To mitigate for the removal of trees, replacement trees shall be planted at the below minimum replacement to removal ratios:

- 1:1 for removal of non-native trees;
- 1:1 for removal of native trees other than oak (Quercus sp.) up to 3 inches diameter at breast height (DBH);
- 3:1 for removal of native trees other than oak 4 to 6 inches DBH;
- 6:1 for removal of native trees other than oak greater than 6 inches DBH;
- 4:1 for removal of oak trees up to 6 inches DBH;
- 5:1 for removal of oak trees greater than 6 inches to 15 inches DBH; and
- 10:1 for removal of oak trees greater than 15 inches in diameter

Replacement tree plantings shall consist of five-gallon or greater saplings and locally-collected seeds, stakes, or other suitable nursery stock as appropriate, and shall be native species to the area adapted to the lighting, soil, and hydrological conditions at the replanting site. If acorns are used for oak tree replanting, each planting will include a minimum of three acorns planted at an approximately two-inch depth to minimize predation risk. Large acorns shall be selected for

plantings. Replacement oaks shall come from nursery stock grown from locally-sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they are planted.

The project proponent shall monitor and maintain, as necessary, all plants for five years to ensure successful revegetation. Planted trees and other vegetation shall each have a minimum of 85 percent survival at the end of five years. If revegetation survival and/or cover requirements do not meet established goals as determined by CDFW, the project proponent is responsible for replacement planting, additional watering, weeding, invasive exotic eradication, or any other practice, to achieve these requirements. Replacement plants shall be monitored with the same survival and growth requirements for five years after planting.

Section 4.5, Cultural Resources

Page 4.5-12:

CUL-1 Architectural History Evaluation

For any future project on a Rezoning Site that is ~~proposed~~ on or adjacent to a property that includes buildings, structures, objects, sites, landscape/site plans, or other features that are 45 years of age or older at the time of or permit application, the project applicant shall hire a qualified architectural historian to prepare an historical resources evaluation. […]

Page 4.5-13:

CUL-4 Extended Phase I Testing

For any projects on a Rezoning Site that is proposed within 100 feet of a known archaeological site and/or in areas identified as sensitive by the Phase I study (Mitigation Measure CUL-3), the project applicant shall retain a qualified archaeologist to conduct an Extended Phase I (XPI) study to determine the presence/absence and extent of archaeological resources on the project site. […]

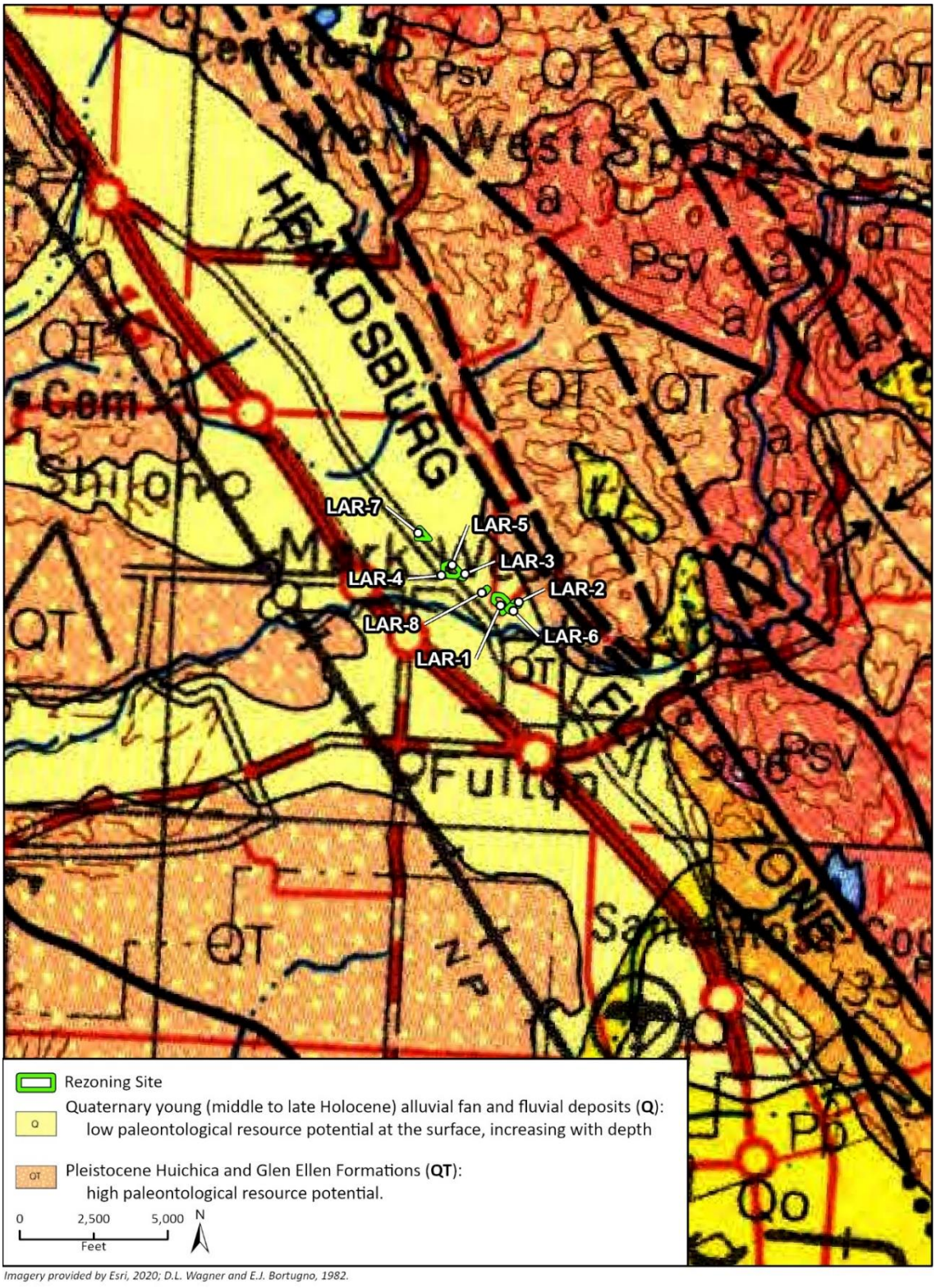
Section 4.6, Energy

Table 4.6-4, page 4.6-13, revised rows only:

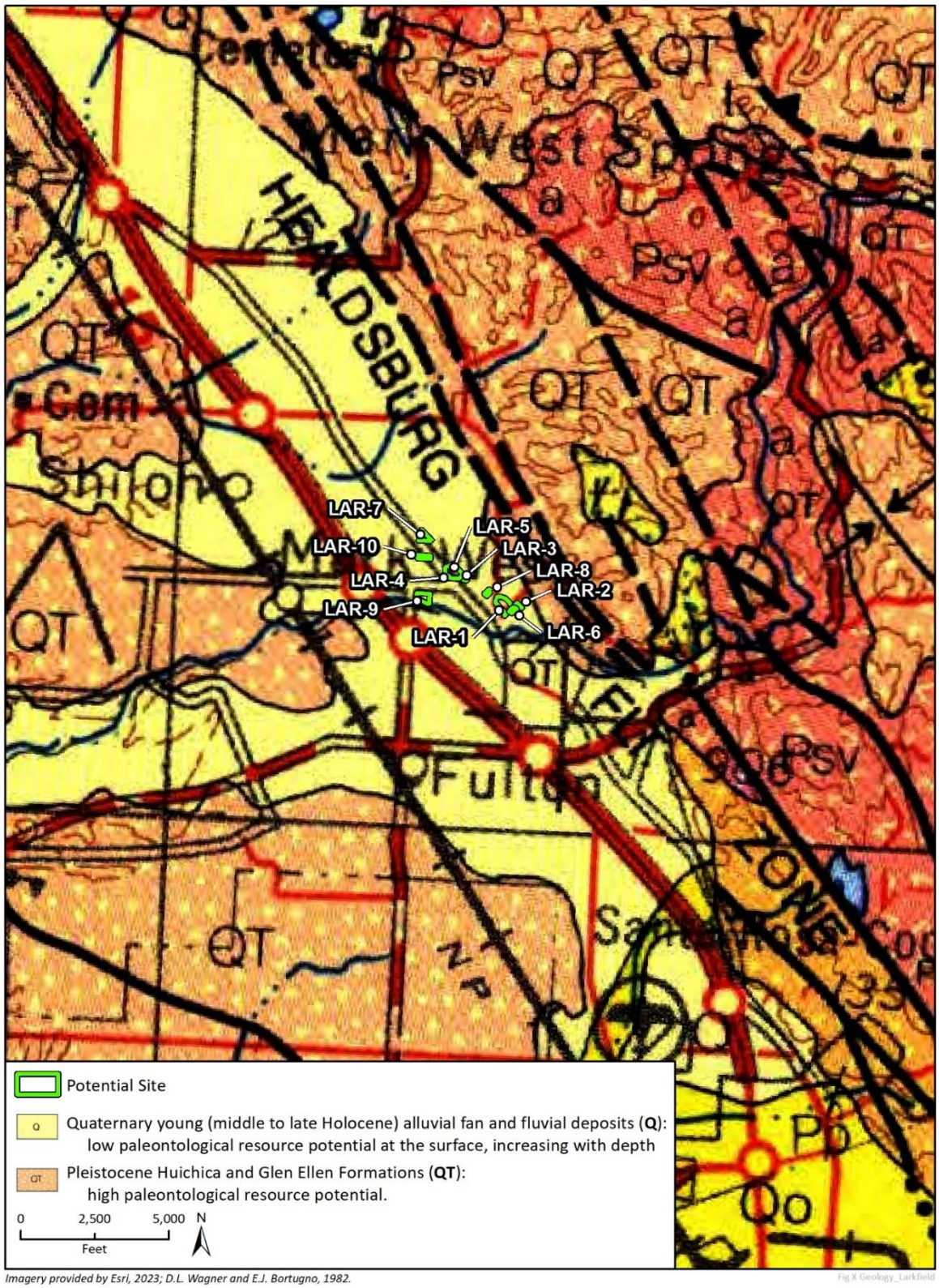
Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
AB 1007: State Alternative Fuels Plans. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality. **Bioenergy Action Plan, EO S-06-06.** The EO establishes the following targets to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050.	**Consistent**. The project would result in a rezoning of sites for ~~medium-density~~ high-density housing in the Unincorporated County and would not interfere with or obstruct the production of biofuels in California. Vehicles used by future residents would be fueled by gasoline and diesel fuels blended with ethanol and biodiesel fuels as required by CARB regulations. Therefore, the project would not conflict with or obstruct implementation of the Bioenergy Action Plan or the State Alternative Fuels Plan.

Section 4.7, Geology and Soils

Figure 4.7-5 is revised as follows on page 4.7-11:



(figure removed)



(figure added)

Page 4.7-29:

GEO-1 Paleontological Review of Project Plans

For projects with proposed ground-disturbing activity on Rezoning Sites, the project applicant shall retain a Qualified Professional Paleontologist to review proposed ground disturbance associated with development to[…]

GEO-2 Paleontological Resources Mitigation and Monitoring Program

For those projects on Rezoning Sites deemed to require a PRMMP under Mitigation Measure GEO-1 above, the Qualified Paleontologist shall prepare a PRMMP for submission to the County prior to the issuance of grading permits. […]

Page 4.7-30:

GEO-3 Paleontological Worker Environmental Awareness Program (WEAP)

Prior to any ground disturbance on ~~within~~ Rezoning Sites underlain by geologic units with high paleontological resource potential, the applicant shall incorporate information on paleontological resources into the Project's Worker Environmental Awareness Training (WEAP) materials, or a stand-alone Paleontological Resources WEAP shall be submitted to the County for review and approval. […]

Section 4.8, Greenhouse Gas Emissions

Page 4.8-19:

GHG-1 Comply With BAAQMD Project-Level Land Use Thresholds

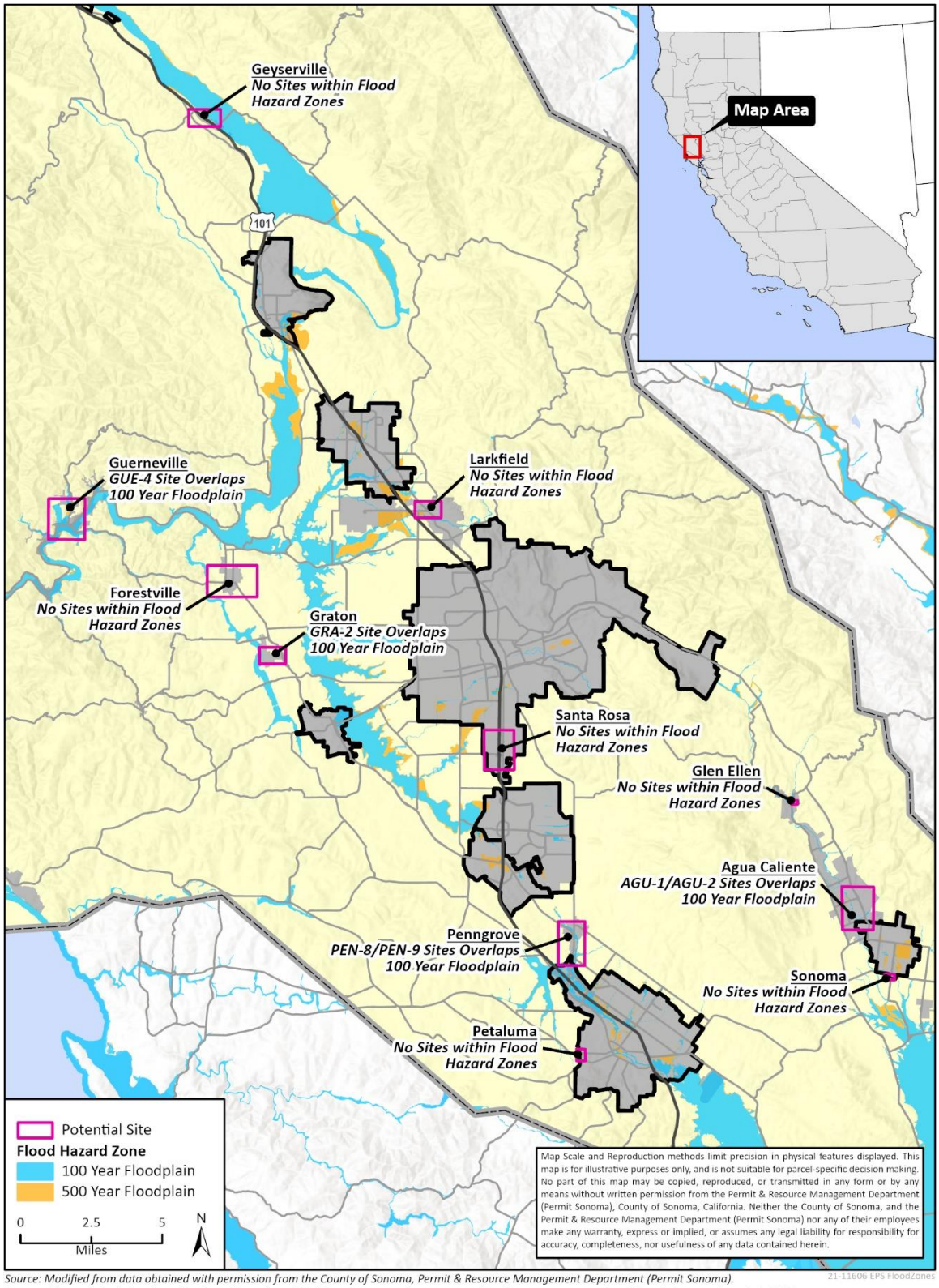
Individual residential projects facilitated by the Housing Element Update project on Rezoning Sites shall comply with the following BAAQMD thresholds for land use projects as defined in the BAAQMD *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, published April 2022, or its later adopted successor. Projects on the Rezoning Sites shall include, at a minimum, the following design elements:[…]

Section 4.10, Hydrology and Water Quality

Page 4.10-9:

> As shown therein, the following sites are partially within the 100-year floodplain: GUE-3, GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, ~~and~~ PEN-9, and LAR-9.

Page 4.10-10, Figure 4.10-4:



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri; FEMA.

(figure removed)

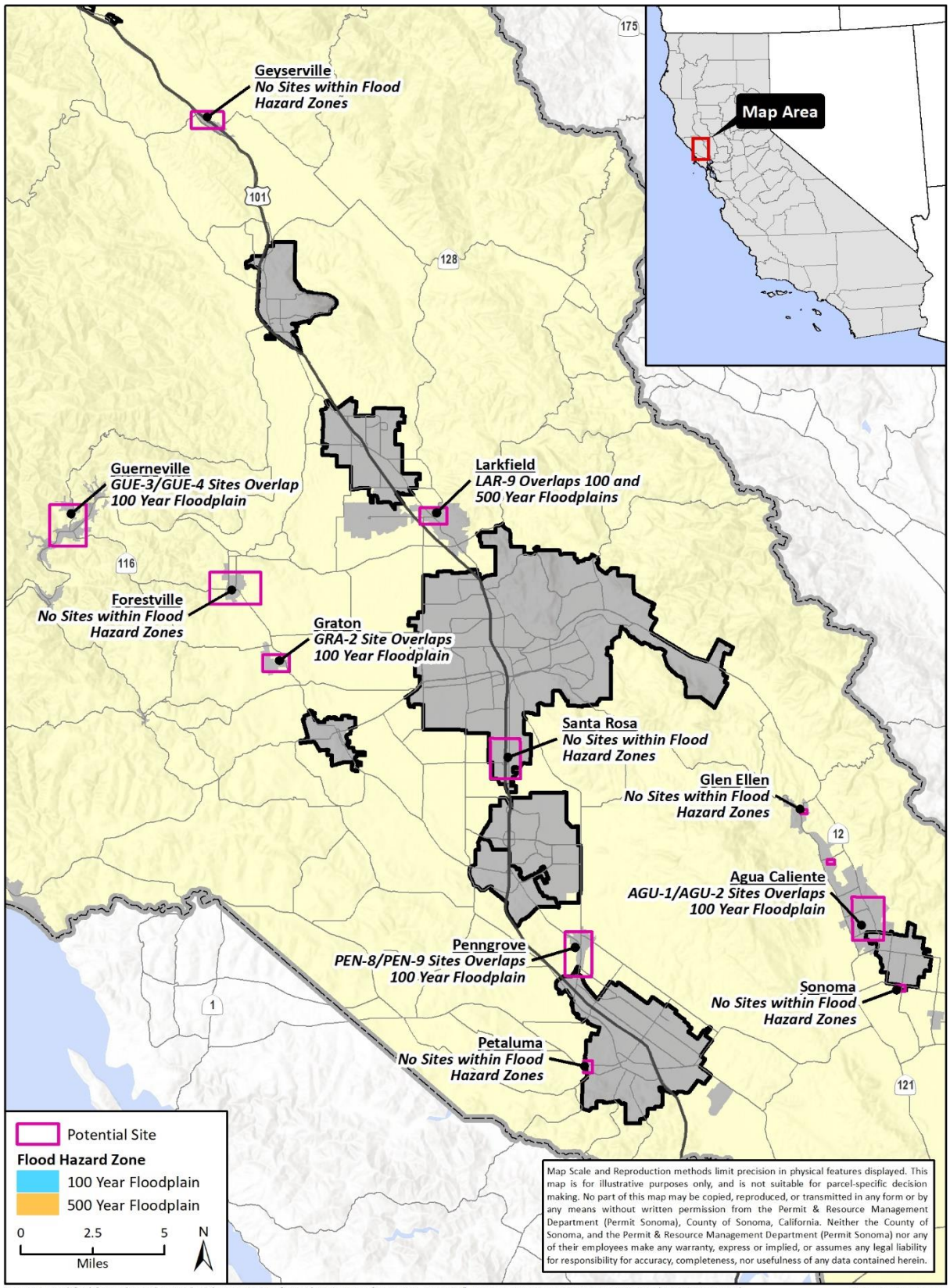


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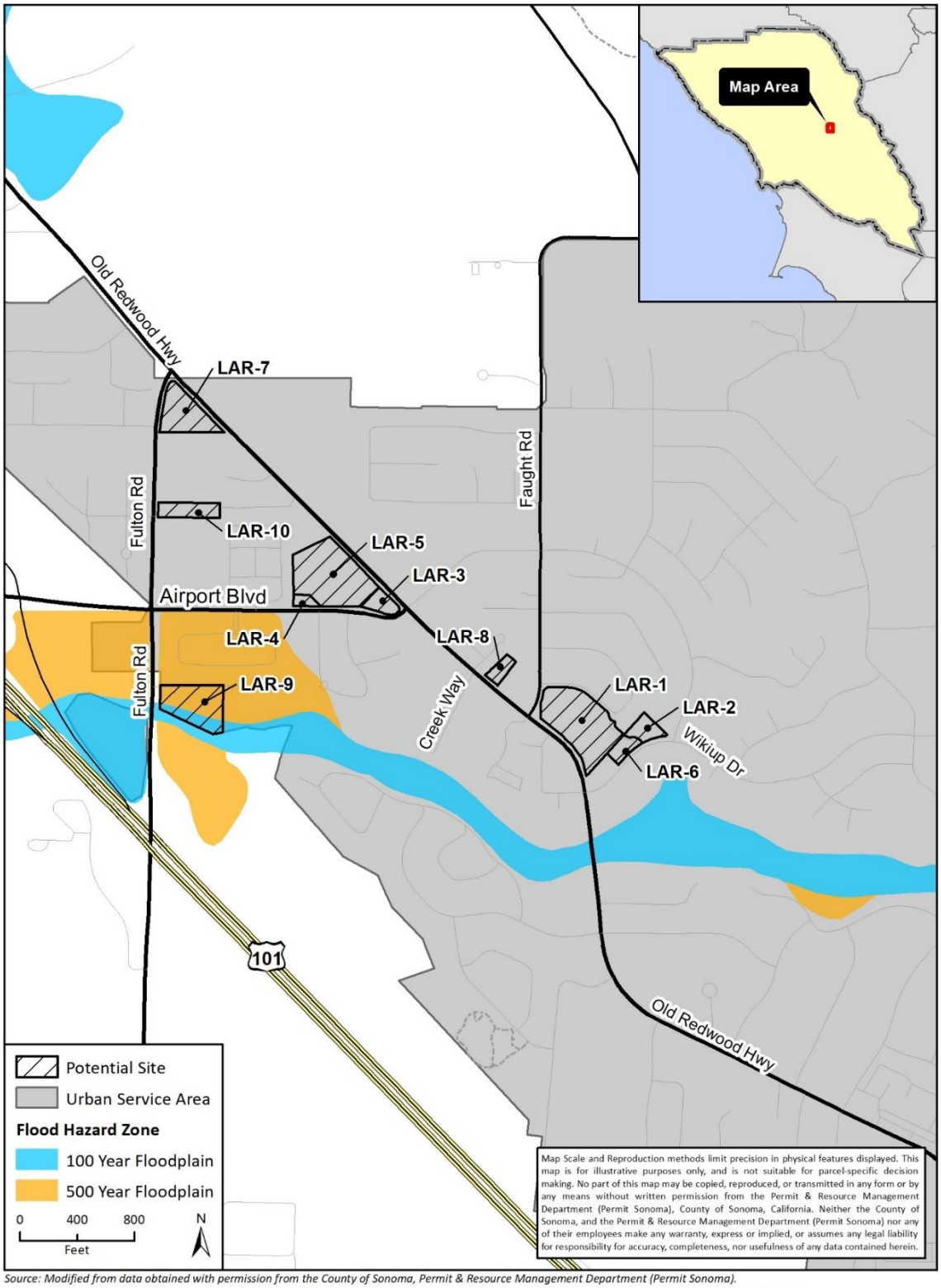
Fig 4.10-1 Flood Zones

(figure added)

The following figure is added immediately preceding page 4.10-15:

Figure 4.10-9 FEMA Floodplain Map – Larkfield



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri; FEMA.

Page 4.10-21:

Section 26-56, F2 Floodplain Combining District (applies to GUE-3, GUE-4, GRA-2, AGU-1, AGU-2, ~~and~~ PEN-8, and PEN-9), …

Page 4.10-28:

As stated in Section 4.10.1, *Environmental Setting*, the following Rezoning Sites are partially within a 100-year flood hazard area: GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, ~~and~~ PEN-9, and LAR-9. Development facilitated by the project would not impede or redirect flood flows on the remaining Rezoning Sites For the sites partially within the 100-year floodplain, development would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. General Plan Goal PS-2. ~~This includes achieving zero net fill within these sites following development, avoiding fill in areas that retain flood waters, and requiring review and approval of proposed drainage facilities by Permit Sonoma.~~ Rezoning Sites that are within the Floodway Combining District (F1) or Floodplain Combining District (F2) would be required to comply with County Zoning Code requirements as stated in Articles 56 and 58, respectively, in Chapter 26 of the Sonoma County Code. This includes the prohibition of fill in County-identified special flood hazard areas (refer to Section7B-12 of the Sonoma County Code), and requiring review and approval of proposed drainage facilities by Permit Sonoma. Under Sonoma County Code Sec. 7B-12, encroachment within adopted floodways, including fill, new construction, substantial improvements, and other development, is not permitted unless it has been demonstrated through hydrologic and hydraulic analysis performed in accordance with standard engineering practice and certified by a registered professional engineer or architect licensed in the state of California that the proposed encroachments shall not result in any increase in flood levels during the occurrence of the base flood discharge. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. Therefore, increased flooding on adjacent parcels to the Rezoning Sites would not occur because of the project.

Section 4.11, Land Use and Planning

Page 4.11-20:

Objective LU-19.1: Avoid extension of Petaluma's Urban Service Boundary and limit urban residential development to the Urban Service Area when annexed by the City.

Policy LU-19a: Use zoning to avoid new urban uses within the Petaluma Urban Service Area prior to annexation by Petaluma.

~~Policy LU-19b: Refer to the City of Petaluma for review and comment any application for discretionary projects within one mile of the Urban Service Boundary.~~

Page 4.11-22:

Objective CT-1.8: Improve demand for transit by development of a growth management strategy encouraging projects in urbanized areas that decrease distance between jobs and housing, increase the stock of affordable housing, and increase density.

Policy CT-1b: Focus commute and through traffic onto Highway 101. Designate major arterial routes to serve primarily as connectors between urban areas.

Policy CT-1c: Work with the Cities to provide locations for jobs, housing, shopping, and coordination of location of transit along the Highway 101 corridor to reduce the volume of traffic on east/west corridors.

Policy CT-1d: Work with the Cities to provide jobs, housing, shopping, and coordination of local transit along the SMART passenger rail corridor to reduce the need for automobile travel to and from work and shopping centers.

Policy CT-1e: Support development, implementation, and operation of a passenger rail system and contiguous north south pedestrian and bicycle path along the SMART passenger rail corridor including the funding necessary to support a multi-modal feeder system.

Policy CT-1k: Encourage development that reduces VMT, decreases distances between jobs and housing, reduces traffic impacts, and improves housing affordability.

~~Policy CT-2f: Require discretionary development projects to provide bicycle and pedestrian improvements and gap closures necessary for safe and convenient bicycle and pedestrian travel between the project and the public transit system.~~

~~Policy CT-2v: Require discretionary development projects, where nexus is identified, to provide crossing enhancements at bus stops, recognizing that many transit riders have to cross the street on one of the two-way commutes.~~

Policy CT-2w: Increase the convenience and comfort of transit riders by providing more amenities at bus stops, including adequately-sized all-weather surfaces for waiting, shelters, trash cans, bike racks, and pedestrian-sized lighting. Required that these improvements be provided as part of nearby public or private development projects.

Page 4.11-31

The proposed project would help meet the County's RHNA allocation, as well as the County's desire to provide higher-density housing throughout the unincorporated areas. The project provides the opportunity for future development of ~~medium~~high-density housing, which is supportive of the County's goal and policies. As outlined above in Table 4.11-3, the project would be substantially consistent with the County General Plan as a whole.

Page 4.11-35 through 4.11-38, Table 4.11-3 (revised rows only):

General Plan Policy	Discussion
Objective LU-20.1: Seek to jointly coordinate and monitor development within the City of Sonoma and the unincorporated Urban Service Area. Discourage urban development within Sonoma's Urban Service Boundary until annexation by the city (excluding parcels within the Sonoma Valley Redevelopment Area). Policy LU-20a: Avoid urban residential and commercial development within Sonoma's Urban Growth Boundary until annexed by the City. Policy LU-20b: In general, encourage annexation by the city prior to urban development on parcels that are within the Sonoma Valley Sanitation District and within the city's primary Sphere of Influence. Require annexation for urban residential development in this area. Parcels within the Sonoma Valley Redevelopment Area are exempt from these policies. Policy LU-20c: Establish procedures for joint City/County review of major projects within the City and the County. Continue to utilize the Sonoma Valley Citizen's Advisory Commission as an advisory body to the two jurisdictions for this purpose.	**Partially Consistent.** SON-1 through SON-4 are located in the City of Sonoma's Urban Service Area and are within the Sonoma Valley Sanitation District and the city's primary sphere of influence. While urban development on these sites is discouraged prior to annexation into the city boundaries, the project does not propose development on these sites at this time but rezoning to allow for ~~medium~~high-density residential development. This would not conflict with these objectives and policies. Per these policies, future proposed development on SON-1 through SON-4 would be required to annex into the city prior to development. However, the project would facilitate urban residential development prior to annexation.
Goal LU-6: Diversify new residential development types and densities. Include a range of urban densities and housing types in some unincorporated communities, and lower density in rural communities. In rural areas, housing types and densities should meet the needs of agricultural and resource users and provide limited residential development on large parcels. **Objective LU-6.1**: Provide opportunities for a range of urban housing types and densities in unincorporated communities, while retaining the character of these communities. **Objective LU-6.2**: Limit residential density to a maximum of one dwelling per acre in unincorporated communities with public water but without sewer systems. **Objective LU-6.6**: Encourage the development of adequate housing for farm workers and farm family members. Site specific environmental factors shall be considered in making decisions on development permits. Site specific factors which create health or safety problems or result in unmitigated significant environmental impacts may at times reduce densities that are allowed by the Land Use Map and zoning. Policy LU-6i: Provide expanded opportunities for a mix of residential and commercial or industrial use in Urban Service Areas.	**Consistent.** The project would encourage higher-density housing in Urban Service Areas that currently contain or are located near single-family housing. This would introduce new residential development types and densities, per Goal LU-6, and would ~~utilize the AH Combining District to~~ increase affordable housing in Urban Service Areas, per Objective LU-6.6 and Policy LU-6h. As stated in Section 4.18, *Utilities and Service Systems*, the Rezoning Sites are within areas where public water and public sewer connections are available in the general vicinity although not always located directly adjacent to each Rezoning Site. Refer to Section 4.7, *Geology and Soils*; Section 4.9, *Hazards and Hazardous Materials*; and Section 4.19, *Wildfire*, for a discussion of site-specific environmental factors that could create health and safety problems. As described under Impact LU-1, adjacent land to the Rezoning Sites are currently used or zoned for residential purposes. Additionally, as shown on Figure 4.11-1 through Figure 4.11-11, while the project would increase the density of residential areas within Urban Service Areas, there are opportunities for commercial development on nearby parcels in these areas, allowing for a mix of residential and commercial uses per Policy LU-6i.

General Plan Policy	Discussion
Objective LU-20.1: Seek to jointly coordinate and monitor development within the City of Sonoma and the unincorporated Urban Service Area. Discourage urban development within Sonoma's Urban Service Boundary until annexation by the city (excluding parcels within the Sonoma Valley Redevelopment Area). Policy LU-20a: Avoid urban residential and commercial development within Sonoma's Urban Growth Boundary until annexed by the City. Policy LU-20b: In general, encourage annexation by the city prior to urban development on parcels that are within the Sonoma Valley Sanitation District and within the city's primary Sphere of Influence. Require annexation for urban residential development in this area. Parcels within the Sonoma Valley Redevelopment Area are exempt from these policies. Policy LU-20c: Establish procedures for joint City/County review of major projects within the City and the County. Continue to utilize the Sonoma Valley Citizen's Advisory Commission as an advisory body to the two jurisdictions for this purpose.	**Partially Consistent.** SON-1 through SON-4 are located in the City of Sonoma's Urban Service Area and are within the Sonoma Valley Sanitation District and the city's primary sphere of influence. While urban development on these sites is discouraged prior to annexation into the city boundaries, the project does not propose development on these sites at this time but rezoning to allow for ~~medium~~high-density residential development. This would not conflict with these objectives and policies. Per these policies, future proposed development on SON-1 through SON-4 would be required to annex into the city prior to development. However, the project would facilitate urban residential development prior to annexation.
Policy LU-20gg: Land use for the Glen Ellen area, including residential densities, shall correspond with the General Plan Land Use Element for Sonoma Valley. New development in Glen Ellen shall be evaluated in the context of the following: (1) the relationship between growth and traffic congestion, (2) the boundaries and extent of Urban Service Areas, (3) the amount and location of recreation and visitor-serving commercial uses, (4) the need to upgrade existing structures and public infrastructure, and (5) the compatibility of rural development with protection of agriculture, scenic landscapes, and resources. Policy LU-20hh: All new development in the Glen Ellen area (as designated in the Glen Ellen Development and Design Guidelines) shall comply with the Glen Ellen Development and Design Guidelines, which are part of the County Development Code.	**Partially Consistent**. This Program EIR analyzes potential transportation impacts of GLE-1 and GLE-2 in Section 4.16, *Transportation*. Traffic congestion is not analyzed because it may not be considered a significant impact under CEQA. Those sites are both within the Urban Service Area for Glen Ellen and would not require expansion of or influence the boundaries of the existing Urban Service Area. **Error! Reference source not found.** shows the existing zoning o f GLE-1, GLE-2, and surrounding areas. As shown therein, the recreation and visitor-serving commercial areas would not be modified by the rezoning of these sites. Section 4.15, *Public Services and Recreation*, and Section 4.18, *Utilities and Service Systems*, analyze whether the project would require upgrades to public facilities and infrastructure. As stated therein, no upgrades to existing facilities are anticipated for GLE-1 and GLE-2. Section 4.2, *Agriculture and Forestry Resources*, and Section 4.1, *Aesthetics*, analyze the potential impacts on agricultural lands and scenic resources. Sites GLE-1 and GLE-2 do not contain prime farmland, unique farmland, farmland of statewide importance, forest land, or timberland, and are not zoned or adjacent to agricultural lands. The project does not propose development on these sites at this time but rezoning to allow for ~~medium~~high-density residential development, and future projects would continue to ~~be allowed by right and would not~~ be subject to review under the Glen Ellen Development and Design Guidelines as discussed in Section 4.1, *Aesthetics*. In addition, ~~as only~~ objective design standards would apply.

General Plan Policy	Discussion
Objective LU-20.1: Seek to jointly coordinate and monitor development within the City of Sonoma and the unincorporated Urban Service Area. Discourage urban development within Sonoma's Urban Service Boundary until annexation by the city (excluding parcels within the Sonoma Valley Redevelopment Area). Policy LU-20a: Avoid urban residential and commercial development within Sonoma's Urban Growth Boundary until annexed by the City. Policy LU-20b: In general, encourage annexation by the city prior to urban development on parcels that are within the Sonoma Valley Sanitation District and within the city's primary Sphere of Influence. Require annexation for urban residential development in this area. Parcels within the Sonoma Valley Redevelopment Area are exempt from these policies. Policy LU-20c: Establish procedures for joint City/County review of major projects within the City and the County. Continue to utilize the Sonoma Valley Citizen's Advisory Commission as an advisory body to the two jurisdictions for this purpose.	**Partially Consistent.** SON-1 through SON-4 are located in the City of Sonoma's Urban Service Area and are within the Sonoma Valley Sanitation District and the city's primary sphere of influence. While urban development on these sites is discouraged prior to annexation into the city boundaries, the project does not propose development on these sites at this time but rezoning to allow for ~~medium~~high-density residential development. This would not conflict with these objectives and policies. Per these policies, future proposed development on SON-1 through SON-4 would be required to annex into the city prior to development. However, the project would facilitate urban residential development prior to annexation.
Goal 3: Promote Production of Affordable Housing Units **Objective HE-3.1**: Eliminate unneeded regulatory constraints to the production of affordable housing. **Objective HE-3.2**: Review and revise housing programs to address changing needs, including needs that may not be met by traditional housing units. Consider the use of new community housing models and innovative types of structures and building materials to meet a wide variety of housing needs while protecting the public health and safety. **Objective HE-3.3**: Increase opportunities for the production of affordable housing. Policy HE-3j: Continue to encourage affordable "infill" projects on underutilized sites within Urban Service Areas by allowing flexibility in development standards pursuant to state density bonus law (Government Code 65915).	**Consistent.** The project would increase opportunities for the development of affordable housing throughout the Unincorporated County by rezoning sites with higher density residential zones. Identified sites are generally undeveloped or underutilized and would be zoned for ~~medium~~high-density housing following approval of the project. Per Policy HE-3l, to the extent feasible, the Rezoning Sites ~~proposed for the AH combining zoning district~~ are located within Urban Service Areas, with adequate water and sewer supplies (Section 4.18, *Utilities and Service Systems*, with implementation of Mitigation Measure UTIL-1), near transit (Section 4.16, *Transportation*), near neighborhood-serving commercial uses (most Rezoning Sites are near commercial areas, with the exception of GUE-2, GUE-3, GUE-4, and AGU-3), near schools (Section 4.15, *Public Services and Recreation*), and at safe distances from major roadways (Section 4.3, *Air Quality*).

Page 4.11-41

County Zoning Ordinance

The project would alter the zoning of the Rezoning Sites, for the future development of ~~medium~~high-density housing in the Unincorporated County. Future projects on these sites would be required to comply with the County's Zoning Ordinance specifications for the proposed zoning of the sites, which would be confirmed during the County development review process. The project would be consistent with the Zoning Ordinance. While the Draft EIR focuses on the impacts of the Rezoning Sites, adoption of

the Housing Element will trigger a variety of amendments to the zoning code, as discussed in the Housing Element.

CITY OF SONOMA GENERAL PLAN

The project includes four sites located in the City of Sonoma's sphere of influence and UGB. While urban development on these sites is discouraged prior to annexation into the City, the project does not propose development on these sites at this time but rezoning to allow for ~~medium~~high-density residential development. Per these policies, future proposed development on SON-1 through SON-4 would be encouraged to obtain annexation into the City prior to development.

Section 4.13, Noise

Page 4.13-8:

~~Policy NE-1d: Consider requiring an acoustical analysis prior to approval of any discretionary project involving a potentially significant new noise source or a noise sensitive land use in a noise impacted area. The analysis shall:~~

~~(1) Be the responsibility of the applicant,~~

~~(2) Be prepared by a qualified acoustical consultant,~~

~~(3) Include noise measurements adequate to describe local conditions,~~

~~(4) Include estimated noise levels in terms of Ldn and/or the standards of Table 4.13-4 for existing and projected future (20 years hence) conditions, based on accepted engineering data and practices, with a comparison made to the adopted policies of the Noise Element. Where low frequency noise (ex: blasting) would be generated, include assessment of noise levels and vibration using the most appropriate measuring technique to adequately characterize the impact,~~

~~(5) Recommend measures to achieve compliance with this Element. Where the noise source consists of intermittent single events, address the effects of maximum noise levels on sleep disturbance,~~

~~(6) Include estimates of noise exposure after these measures have been implemented, and~~

~~(7) Be reviewed by the Permit and Resource Management Department and found to be in compliance with PRMD guidelines for the preparation of acoustical analyses.~~

Policy NE-1e: Continue to follow building permit procedures to ensure that requirements based upon the acoustical analysis are implemented.

Page 4.13-19:

NOI-4 BLASTING NOISE AND VIBRATION REDUCTION MEASURES

If construction activities using blasting occurs during construction ~~of~~ on a Rezoning Site, the following measure shall be implemented: […]

NOI-5 HVAC NOISE REDUCTION MEASURES

For an individual project on a Rezoning Site that would place one or more HVAC unit(s) within 30 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of the HVAC unit(s) shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses […]

NOI-6 GENERATOR NOISE REDUCTION MEASURES

For an individual project on a Rezoning Site that would place one or more HVAC unit(s) within 30 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of the HVAC unit(s) shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses […]

Section 4.14, Population and Housing

Page 4.14-6:

The project proposes to update the County's existing Housing Element Update, which would result in rezoning of sites for ~~medium density~~ high density housing throughout urban service areas in the Unincorporated County

Page 4.14-9:

PH-1 Relocation Plan

In order to protect against increasing susceptibility to displacement, the County shall require replacement housing units, based on but not limited in applicability to the requirements in Government Code Section 65915(c)(3), when any new development occurs on a site in the Sites Inventory if that site meets any of the following conditions:

- Currently has residential uses or within the past five years has had residential uses that have been vacated or demolished; or
- Was subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower- or very-low income; or
- Is occupied by lower- or very low-income households.

~~For Rezoning Sites that contain existing rental housing that would displace individuals during development, the project applicant shall prepare a relocation plan similar to the requirements of Government Code Section 7260-7277. The relocation plan may include, but not be limited to:~~

1. ~~Proper notification of occupants or persons to be displaced.~~
2. ~~Provision of "comparable replacement dwelling" which means decent, safe, and sanitary; and adequate in size to accommodate the occupants.~~
3. ~~Provision of a dwelling unit that is within the financial means of the displaced person.~~
4. ~~Provision of a dwelling unit that is not subject to unreasonable adverse environmental conditions.~~

~~This measure shall apply to future development projects on Rezoning Sites that may displace individuals and is not limited to development undertaken by a public entity or development that is publicly funded. The County shall approve the relocation plan prior to project approval.~~

Section 4.15, Public Services and Recreation

Page 4.15-8:

~~Policy PF-2n: Require prior to discretionary project approval written certification that fire and related services customarily provided to comparable uses are available or will be available prior to occupancy for projects within the service area of the applicable fire agency.~~

Policy PF-2x: Utilize development fees to require that new development pay for its share of needed infrastructure as identified in existing and future Capital Improvement Plans prepared by the County.

Page 4.15-16:

To address this shortage, the County requires payment of park fees for development requiring discretionary approvals in the amount of $3,678 per residential unit prior to the issuance of a building permit (per Sonoma County Code Section 20-65); or appraisal of the property in the same manner as a subdivision which would require the payment of in-lieu park fees pursuant to Sonoma County Code Section 25-58. Future ~~in-lieu fees to fund park facilities (per SOnoma County Code Section 20-65) offsetting any impacts related to increased demand at existing recreation facilities, and~~ project applicant(s) of the Rezoning Sites would be required to pay this park fee during the permit approval process in order to offset any impacts related to increased demand at existing recreation facilities.

Section 4.16, Transportation

Page 4.16-5:

Mirabel Road, located north of Forestville, is a north to south collector with one lane in each direction. The road begins at the intersection with Highway 116 and ends at the intersection with River Road.

Page 4.16-10:

Policy CT-1k: Encourage development that reduces VMT, decreases distances between jobs and housing, reduces traffic impacts, and improves housing affordability.

~~Policy CT-2f: Require discretionary development projects to provide bicycle and pedestrian improvements and gap closures necessary for safe and convenient bicycle and pedestrian travel between the project and the public transit system.~~

~~Policy CT-2v: Require discretionary development projects, where nexus is identified, to provide crossing enhancements at bus stops, recognizing that many transit riders have to cross the street on one of the two-way commutes.~~

Policy CT-2w: Increase the convenience and comfort of transit riders by providing more amenities at bus stops, including adequately-sized all-weather surfaces for waiting, shelters, trash cans, bike

racks, and pedestrian-sized lighting. Required that these improvements be provided as part of nearby public or private development projects.

Page 4.16-18:

In addition, General Plan Policies ~~CT-2v and~~ CT-2w and CT-3xx provide for urban and community design that prioritizes pedestrian safety; General Plan Policies CT-4e and CT-4f provide roadway design requirements and allow safety improvements to be included as conditions of approval; and General Plan Policies CT-3c and CT-3d include provisions for traffic safety as part of the implementation of traffic calming measures or local community design guidelines.

Section 4.17, Tribal Cultural Resources

Page 4-17-4:

TCR-2 Avoidance of Tribal Cultural Resources

Development facilitated by the project on Rezoning Sites shall be designed to avoid known tribal cultural resources. Any tribal cultural resource within 60 feet of planned construction activities shall be fenced off to ensure avoidance. The feasibility of avoidance of tribal cultural resources shall be determined by the County and applicant in consultation with local (traditionally and culturally affiliated) California Native American tribe(s).

TCR-5 Sensitive Location of Human Remains

For any development facilitated by the project on Rezoning Sites where human remains are expected to be present based on the results of tribal consultation during the implementation of TCR-1 and/or as identified by the qualified archaeologist, the County shall consult with local California Native American tribe(s) on the decision to employ a canine forensics team. […]

Section 4.18, Utilities and Service Systems

Page 4.18-1, Table 4.18-1 (revised rows only):

Site Group	Water Provider	Water Supply Source
Larkfield	California American Water – Larkfield	California American Water, local wells ~~Unknown[1]~~

[1] Information was not provided by the agency

Source: Appendix WSS; Appendix WSA

Page 4.18-7:

Policy PF-1c: Give the highest priority for water and sewer improvement planning to those service providers whose capacity for accommodating future growth is most limited. These include the Occidental County Sanitation District, the Geyserville Water Works and Geyserville Sanitation Zone, the Sweetwater Springs Water District, Monte Rio, the Town of Windsor (water supply to the Airport Industrial Area), the California American Water Company (Larkfield-Wikiup), the Airport-Larkfield-Wikiup County Sanitation Zone, the Valley of the Moon Water District, and the Sonoma Valley Sanitation District, or any entities which may succeed these service providers.

~~Policy PF-1d: Require as part of discretionary project applications within a water or sewer service area written certification that either existing services are available or needed improvements will be made prior to occupancy.~~

Policy PF-1e: Avoid General Plan amendments that would increase demand for water supplies or wastewater treatment services in those urban areas where existing services cannot accommodate projected growth as indicated in Table LU-1 or any adopted master plan.

Page 4.18-14:

…Additionally, the wastewater capacity for sites GUE-1 through GUE-4, GRA-1 through GRA-5, and PET-1 through PET-4 is either unknown or limited. It should also be noted that Site GRA-4 would need to be annexed into the Graton Community Services District in order to receive wastewater collection treatment services.

Page 4.18-16:

UTIL-1 Water and Wastewater Provider Capacity

Future development proposed on the following sites shall be required to demonstrate that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary improvements to serve a Rezoning Site will be made prior to occupancy:

1. Rezoning Sites that need to demonstrate capacity from the applicable water service provider: GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4.
2. Rezoning Sites that need to demonstrate capacity from the applicable wastewater service provider: GEY-1, GUE-2, GUE-3, LAR-1 through LAR-8, FOR-1, FOR-2, FOR-6, GRA-4, SAN-6, SAN-7, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4.
3. Rezoning Site GRA-4 shall be annexed into the Graton Community Services District prior to development of the site.

The required documentation shall be provided to the County during the plan review and permit approval process for projects on the above-listed Rezoning Sites.

Section 4.19, Wildfire

Page 4.19-26:

…However, as evidenced by recent wildfires in the County, urban areas, particularly those on the outer edges of urban development, are also susceptible to wildfires, despite ~~the~~ having less abundant typical wildfire fuels.

Page 4.19-26:

Access to Rezoning Sites FOR-2, FOR-4, GRA-2, AGU-1, and AGU-2 currently does not meet County road standards of 20 feet in width or greater, and access to Rezoning Sites GUE-1 through GUE-3 also appear not to mee this requirement. Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways would ~~could~~ be required.

Page 4.19-27:

WFR-1 Construction Wildfire Risk Reduction

The County of Sonoma shall require the following measures during project construction on Rezoning Sites:

5. Construction activities with potential to ignite wildfires shall be prohibited during red-flag warnings issued by the National Weather Service for the site. Example activities include welding and grinding outside of enclosed buildings.
6. Fire extinguishers shall be available onsite during project construction. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher.
7. Construction equipment powered by internal combustion engines shall be equipped with spark arresters. The spark arresters shall be maintained pursuant to manufacturer recommendations to ensure adequate performance.

At the County's discretion, additional wildfire risk reduction requirements may be required during construction. The County shall review and approve the project-specific methods to be employed prior to building permit approval.

WFR-2 Landscape Plan Wildfire Risk Reduction

Project landscape plans for projects on Rezoning Sites shall include fire-resistant vegetation native to Sonoma County and/or the local microclimate of the site and prohibit the use of fire-prone species, especially non-native, invasive species.

Section 6, Alternatives

Page 6-18:

5. The County considered an alternative where development "by right" is not an integral project component. By-right means that no discretionary land use approvals would be required for the development of ~~medium-density~~ high-density housing on the Rezoning Sites. This alternative was eliminated because it would not reduce or avoid an environmental impact, as the same level of future buildout would be anticipated as under the proposed project.

Housing Element Update

Draft Environmental Impact Report

prepared for

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December 2022

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Figures

Appendices

Acronyms and Abbreviations

AASHTO	American Association of State Highway and Transportation Officials
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	asbestos-containing materials
AFY	acre-feet per year
ARM	Aggregate Resources Management
BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
BRA	Biological Resources Assessment
BSA	Biological Study Area
Btu	British thermal unit
°C	degrees Celsius
CAA	Clean Air Act
CAAQS	California ambient air quality standards
CAFE	Corporate Average Fuel Economy
Cal-Am	California American Water
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CalOES	California Office of Emergency Services
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFGC	California Fish and Game Code

CFR	Code of Federal Regulations
CGC	California Government Code
CGS	California Geological Survey
CH_4	methane
CIP	capital improvement program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CoIWMP	Countywide Integrated Waste Management Plan
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRLF	California red-legged frog
CRPR	California Rare Plant Rank
CTS	California tiger salamander
CWA	Clean Water Act
cy	cubic yards
dB	decibels
dBA	A-weighted sound pressure level
DOC	California Department of Conservation
DOF	California Department of Finance
DPM	diesel particulate matter
DPR	California Department of Pesticide Regulations
DPS	Distinct Population Segment
DTSC	Department of Toxic Substances Control
du	Dwelling unit
DWR	California Department of Water Resources
EAP	Energy Action Plan
EIA	Energy Information Administration
EIR	Environmental Impact Report
EO	Executive Order
ESU	Evolutionarily Significant Unit
EV	electric vehicle

°F	degrees Fahrenheit
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FIGR	Federated Indians of Graton Rancheria
FMMP	Farmland Mapping and Monitoring Program
FPD	fire protection district
FPPA	Farmland Protection Policy Act
FSZ	Farmland Security Zone
FTA	Federal Transit Administration
GHG	greenhouse gas
gpd	gallons per day
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
GWh	gigawatt hours
GWP	global warming potential
HABS	Historic American Building Survey
HCP	Habitat Conservation Plan
HVCAC	heating, ventilation, and air conditioning
HWCL	California Hazardous Waste Control Law
Hz	Hertz
IOU	investor-owned utility
IPCC	Intergovernmental Panel on Climate Change
kBtu	thousands of British thermal units
kWh	kilowatt-hour
LAFCO	Local Agency Formation Commission
LBP	lead-based paint
L_{dn}	Day-night average level
L_{eq}	equivalent noise level
LID	Low Impact Development
LRA	Local Responsibility Area
LUST	leaking underground storage tank

MBTA	Migratory Bird Treaty Act
$\mu g/m^3$	micrograms per cubic meter
MGD	millions of gallons per day
MMBtu	millions of British thermal units
MMT	million metric tons (gigatonne)
mph	miles per hour
MPO	metropolitan planning organization
MS4	Municipal Separate Storm Sewer System
MTC	Metropolitan Transportation Commission
NAAQS	national ambient air quality standards
NAHC	Native American Heritage Commission
NCAB	North Coast Air Basin
NMFS	National Marine Fisheries Service
NO_2	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NOC	Notice of Completion
NOD	Notice of Determination
NOP	Notice of Preparation
NO_x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
NSCAPD	Northern Sonoma County Air Pollution Control District
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PCB	polycholorinated byphenals
PG&E	Pacific Gas and Electric Company
$PM_{2.5}$	particulate matter with an aerodynamic diameter equal to or less than 2.5 microns
PM_{10}	particulate matter with an aerodynamic diameter equal to or less than 10 microns
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PQS	Professional Qualifications Standards
PRC	Public Resources Code

PRMMP	Paleontological Resource Mitigation and Monitoring Program
PSD	Prevention of Significant Deterioration
PV	solar photovoltaic
PWS	public water system
RCNM	Roadway Construction Noise Model
RCPA	Regional Climate Protection Authority
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Needs Assessment
RMS	root-mean-square
ROG	reactive organic gases
RPS	Renewable Portfolio Standard
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient
SAF Plan	State Alternative Fuels Plan
SB	Senate Bill
SCP	Sonoma Clean Power
SCS	Sustainable Communities Strategy
SCTA	Sonoma County Transportation Authority
SDWA	Safe Drinking Water Act
SEMS	Standardized Emergency Management System
SF_6	sulfur hexafluoride
SFBAAB	San Francisco Bay Area Basin
SHMP	State of California Multi-Hazard Mitigation Plan
SIP	State Implementation Plan
SMARA	Surface Mining and Reclamation Act
SMART	Sonoma-Marin Area Rail Transit
SOI	sphere of influence
SO_2	Sulfur Dioxide
SRA	State Responsibility Area
SSWD	Sweetwater Springs Water District
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
SVP	Society of Vertebrate Paleontology

TAC	toxic air contaminant
TCR	Tribal Cultural Resource
TDM	Transportation Demand Management
TMDL	total maximum daily load
tpd	tons per day
tpy	tons per year
UGB	Urban Growth Boundary
USACE	United States Army Corps of Engineers
USC	United States Code
USEPA	United States Environmental Protection Agency
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
UST	underground storage tank
UWMP	Urban Water Management Plan
VESCO	Vineyard & Orchard Development and Agricultural Grading and Draining Ordinance
VMT	vehicle miles traveled
VOC	volatile organic compound
WEAP	Worker Environmental Awareness Training
WMO	World Meteorological Organization
WQCP	Water Quality Control Plan
WUI	Wildland Urban Interface
WWTP	wastewater treatment plant
XPI	Extended Phase I

Glossary of Terms

Affordable Housing	Housing which costs no more than 30 percent of a low or very low-income household's gross monthly income. For rental housing, the residents pay up to 30 percent of gross income on full-service rent (including utilities) or the combination of rent and separate utility costs. For home ownership, residents pay up to 30 percent on the combination of mortgage payments, taxes, insurance, and utility costs.
Area Plan	Specific plans and area plans are planning documents that guide the development of a particular geographic area within the county. View the area and specific plans for various areas in Sonoma County.
Build Out	A theoretical level of development which assumes that every parcel of land will develop to the maximum allowed by a plan or zoning.
City Limits	City limits refer to the defined boundary or border of an incorporated city within Sonoma County. Areas outside city limits are unincorporated county lands.
Land Use	The occupation or utilization of land or water area for any human activity or purpose.
Local Agency Formation Commission (LAFCO)	A county commission that reviews and evaluates all proposals for the formation of special districts, incorporation of cities, annexation to special districts or cities, consolidation of districts, merger of districts with cities, and setting of spheres of influence. Each county's LAFCO is empowered to approve, disapprove, or conditionally approve these proposals.
Public Services	Infrastructure, including roads, sanitary sewers, storm drains and water mains and social services, including police, fire, health, schools, transit, recreation and libraries.
Public Utility Facility	A facility for the provision of water, light, heat, communications, power, or for sewage collection, treatment, or disposal.
Rural	A comprehensive term contrasting to urban. Those areas not intended for urban development.
Scenic Corridor	As designated in the Open Space and Resource Conservation Element of the County’s General Plan, a strip of land of high visual quality along a certain roadway.
Scenic Highway	Those roadways in Sonoma County that have been so designated by the State of California.

Sphere of Influence	The probable ultimate physical limits and service area of a local government jurisdiction as determined by LAFCO.
Unincorporated Community	Areas within the County's jurisdiction that have some or all urban services that support urban level densities.
Urban	Contrasting with rural, pertaining to uses of land typically occurring within cities, such as high density residential, commercial, and industrial uses.
Urban Growth Boundary	A voter designated limit to the urban development of a city.
Urban Service Area	The geographical area within the Urban Service Boundary that is designated for urban development in the Land Use Element of the County's General Plan.
Urban Services	The full range of public services and infrastructures including sewer, water, police and fire protection, roads and transit etc.
Urban Service Boundary	A designated limit to the urban development of the cities and unincorporated communities of the County.
Vehicle Miles Traveled (VMT)	A unit to measure vehicle travel made by a private vehicle, such as an automobile, van, pickup truck, or motorcycle. Each mile traveled is counted as one vehicle mile regardless of the number of persons in the vehicle.
Viewshed	The area visible from a defined observation point.
Williamson Act	The California Land Conservation Act of 1965 (as it may be amended from time to time) that allows counties to establish agricultural preserves through agreements with property owners to maintain agricultural uses in exchange for property tax benefits.
Zoning District	A designated section of the County for which prescribed land use requirements and building and development standards are uniform.

Executive Summary

This document is a Program Environmental Impact Report (EIR) analyzing the environmental effects of the proposed Sonoma County Housing Element Update (proposed project). This section summarizes the characteristics of the proposed project, alternatives to the proposed project, and the environmental impacts and mitigation measures associated with the proposed project.

Project Synopsis

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Project Description

This Program EIR has been prepared to examine the potential environmental effects of the Sonoma County Housing Element Update. The following is a summary of the full project description, which can be found in Section 2.0, *Project Description*.

The proposed project would update Sonoma County's current Housing Element, including goals, objectives, policies, and implementing programs. The Housing Element Update would rezone 59 urban sites located in designated Urban Service Areas throughout unincorporated Sonoma County, listed in Table 2-1, for by-right, medium-density housing[1]. In addition, 20 additional inventory sites would not be rezoned under implementation of the project. The project would also add these sites to the County's Housing Element site inventory to comply with new inventory requirements in Housing Element law. All Rezoning Sites near incorporated areas are within or adjacent to voter-approved Urban Growth Boundaries[2]. Current designations of the sites include agricultural, residential, commercial, and industrial uses. The sites include both undeveloped and developed parcels. A full list of sites, their addresses, their corresponding zoning and land use designations can be found in Table 2-2 of Section 2.0, *Project Description*.

[1] By-right medium-density housing means that no land use approvals for the development of medium-density housing would be required on the sites. Design review approval is required for all multifamily or mixed-use housing development with more than 3 units.
[2] Urban Growth Boundaries are voter designated limits to the urban development of a city.

The project includes 1) an update to the Sonoma County Housing Element; (2) a General Plan Map amendment as necessary and, where applicable, area plan amendments to change land uses and allowable densities on identified sites; (3) rezoning of sites to match new General Plan land uses or densities, or to add the Workforce Housing (WH) Combining District; and (4) this Program EIR to evaluate the potential environmental impacts of the project. The project is intended to facilitate and encourage housing development that could be developed over an 8-year period, commencing in 2023 and ending in 2031.

Project Characteristics

The proposed project would identify sites to be added to the County's General Plan Housing Element site inventory to comply with State law. The project would implement existing General Plan Policies and Programs that require the County to identify urban sites near jobs and transit which may appropriately accommodate additional housing. The project would also identify appropriate sites on which to place the WH Combining District, which would allow the development of jobs and/or housing on the same site or within walking distance from one another. The WH Combining District is an overlay added to sites with non-residential base zoning to allow for housing to be built on sites containing or adjacent to jobs.

Rezoning Sites analyzed for rezoning to R2 (Medium-Density Residential), with a base density of 10 to 11 units per acre, were assumed to be rezoned to allow a density of 20 to 22 units per acre, respectively, which represents the maximum buildout potential utilizing the County's Rental Housing Opportunity Area program, which automatically doubles a site's density for projects that include at least 40 percent of units as affordable to lower income households. Sites analyzed for rezoning to add the WH Combining District were assumed to allow a density of 24 units per acre, the maximum allowed in the WH Combining District. If all 59 sites were chosen to move forward in the rezoning project studied under this Program EIR, project implementation could increase the housing availability in the County to accommodate up to 3,312 additional dwelling units and approximately 8,246 additional people. This buildout assumption includes the dwelling unit and population buildout potential of the 20 additional inventory sites that would not be rezoned under implementation of the project.

Project Objectives

1. Meet the State required RHNA for 6th Cycle Housing Element planning period of 2023-2031
2. Bring the General Plan into conformance with recently enacted State housing law
3. Identify housing policies and programs that enable the development of additional units and the preservation of existing units, that reduce governmental constraints to building housing, and that affirmatively further fair housing
4. Identify housing sites with a collective capacity to meet the County's RHNA, with buffer capacity
5. Encourage the development of higher-density housing in the County, increasing the overall availability of housing
6. Provide housing development opportunities throughout the urban areas of the Unincorporated County near jobs, transit, services, and schools
7. Implement existing goals, objectives, and policies of the Sonoma County General Plan that focus growth in established Urban Service Areas and encourage the development of infill sites to prevent sprawl and protect agricultural land and open space

Alternatives

As required by the California Environmental Quality Act (CEQA), this Program EIR examines alternatives to the proposed project. Studied alternatives include the following three alternatives. Based on the alternatives analysis, Alternative 3 was determined to be the environmentally superior alternative.

1. Alternative 1: No Project
2. Alternative 2: Workforce Housing Combining District
3. Alternative 3: Fewer Rezoning Sites

Alternative 1 (No Project) assumes that the Housing Element Update would not take place and there would be no change in zoning or General Plan land use designations for the parcels identified by the project. Current uses on the sites would continue under this alternative, with future full buildout of the Rezoning Sites limited by the existing zoning and General Plan designations. Buildout of the Rezoning Sites under existing zoning would allow for up to 354 total housing units, housing a population of 920 residents. This alternative would not accomplish the project objectives to update the General Plan's Housing Element in compliance with State-mandated housing requirements, nor would this alternative provide more housing development opportunities in urban areas, encourage the development of additional high-density housing, or alleviate the housing shortages currently experienced in the County.

Alternative 2 (Workforce Housing Combining District) would involve amending the zoning code to allow for the placement of the WH Combining District on all the Rezoning Sites and placing the WH Combining District on all the Rezoning Sites, which would allow for both commercial development and new residences to be constructed on the Rezoning Sites. For purposes of the environmental analysis, it was assumed all 59 sites would be developed with a combination of commercial and residential uses. Buildout under this alternative would incorporate the 79 identified sites into the Housing Element site inventory but would accommodate fewer new residents. Nonetheless, the alternative would contribute to increasing housing development opportunities in unincorporated Sonoma County. It is assumed that approximately two thirds of the development proposed under the project would occur under this alternative, resulting in approximately 2,557 new dwelling units and approximately 6,281 new residents. This would result in approximately 2,203 new dwelling units and approximately 5,361 new residents more than would be developed under existing zoning. This pattern of development would allow locally serving retail uses along with residential uses at the Rezoning Sites, which would reduce the VMT for residents of those sites and surrounding areas because they would live close to some commercial uses. The commercial component of this alternative would allow for commercial uses on the ground floor with up to two stories of residential uses above. The building envelopes under this alternative would be identical to those under the proposed project, as the reduction in housing square footage would be balances by the increase in commercial square footage. This alternative would result in an update to the County’s existing Housing Element, provide housing development opportunities, encourage the development of additional workforce housing, and alleviate the housing shortage currently experienced in the County, although to a lesser extent than the proposed project. However, this alternative would not meet project objectives because no sites would be zoned exclusively for housing.

Alternative 3 (Fewer Rezoning Sites) would not include the Rezoning Sites with the most environmental constraints that would make developing sites more difficult. These Rezoning Sites would have greater environmental impacts and would be more costly to develop, thus have been removed from Alternative 3. These Rezoning Sites are described below:

1. FOR-1
2. FOR-2
3. SON-1
4. SON-2
5. SON-3
6. SON-4

These six Rezoning Sites have greater than average environmental constraints compared to the other Rezoning Sites. In particular, these sites would require off-site infrastructure water and sewer improvements to serve future development. Under this alternative, the remaining 53 Rezoning Sites would be rezoned for future development, identical to the proposed project. Development facilitated by Alternative 3 would result in approximately 2,898 new dwelling units and approximately 7,535new residents. This would add approximately 2,599 new dwelling units and approximately 6,795 new residents more than development that occurs under existing zoning.

Refer to Section 6, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

The EIR scoping process did not identify any areas of known controversy for the proposed project. Responses to the Notice of Preparation of a Draft EIR and input received at the EIR scoping meeting held by the County are summarized in Chapter 1.0, *Introduction*. However, subsequent public meetings and comments on the Housing Element have brought up issues related to population and housing, utilities and service systems, and wildfire.

Issues to be Resolved

The proposed project would require a General Plan map amendment to change land use designations and densities for identified sites, zone changes for identified sites to new zoning districts and density designations to match new General Plan densities, and, for select sites, the addition of the WH Combining District. Following hearings before the Planning Commission and the Board of Supervisors, the Board of Supervisors may certify this Program EIR and approve the project.

Summary of Impacts and Mitigation Measures

Table ES-1 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

1. **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a

Statement of Overriding Considerations to be issued if the project is approved per CEQA Guidelines Section 15093.

2. **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under CEQA Guidelines Section 15091.
3. **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
4. **No Impact:** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure (s)	Residual Impact
Aesthetics		
Impact AES-1. The proposed project would facilitate development on four sites where public views of scenic vistas are afforded. Full buildout of these sites could block public views or obstruct them.	None available.	Significant and Unavoidable
Impact AES-2. Rezoning Sites in Forestville and Graton border a State scenic highway, and Rezoning Sites in Guerneville and Glen Ellen are proximate to State scenic highways. Therefore, scenic resources could be affected if individual projects are visible from these roadways.	None available.	Significant and Unavoidable
Impact AES-3. Individual projects implemented on 25 Rezoning Sites have the potential to adversely affect public views and community aesthetic character.	**AES-1 Screening Vegetation.** Project landscape plans shall be designed with screening vegetation. Project landscape plans shall be approved by the County prior to building permit approval.	Significant and Unavoidable
Impact AES-4. Development facilitated by the project would create new sources of light or glare that could adversely affect the visual environment.	**AES-2 Exterior Lighting Requirements.** Project designs shall incorporate exterior lighting plans meeting the following minimum requirements. 1. Lighting shall be mounted low, downward casting, and fully shielded to prevent glare. 2. Lighting shall not wash out structures or any portions of the site. 3. Light fixtures shall not be located at the periphery of the property and shall not spill over onto adjacent properties or into the sky. 4. Flood lights are not permitted. 5. Parking lot fixtures shall be limited to 20 feet in height. 6. All parking lot and/or streetlight fixtures shall use full cut-off fixtures.	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	7. Lighting shall shut off automatically after businesses close and security lighting shall be motion-sensor activated. 8. Lighting plans shall be designed to meet the appropriate Lighting Zone standards from Title 24 effective October 2005 (LZ1 for dark areas, LZ2 for rural, LZ3 for urban) or successor regulations.	
Agriculture and Forestry Resources		
Impact AG-1. None of the Rezoning Sites occur on land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, development facilitated by the project would not convert these types of lands to non-agricultural use. None of the lands are under Williamson Act Contract and thus, these lands under this protection would not be converted to non-agricultural use.	None required	No impact
Impact AG-2. None of the Rezoning Sites are situated in areas zoned for timberland production (TPZ) and, therefore, development facilitated by the project would not conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production. Development facilitated by the project would not result in the loss of forest land or conversion of forest land to non-forest use.	None required	No impact
Impact AG-3. The project would rezone some sites that are adjacent to agricultural uses, and may indirectly impact those uses.	**AG-1 Interim Agricultural Buffers.** Development facilitated by the project adjacent to active agricultural operations shall provide fencing and a minimum buffer of 200 feet to the agricultural operations, consistent with 26-88-040(f) of the Sonoma County Zoning Code. If this distance is not practical due to project design or features, a minimum 100-foot buffer is acceptable if it complies with all of the requirements for a reduced buffer and a vegetative screen is provided as specified in Section 26-88-040(f).	Less than significant
Air Quality		
Impact AQ-1. The project would support the primary goals of the 2017 Clean Air Plan, would implement applicable control measures for the 2017 Clean Air Plan, and would not disrupt or hinder implementation of any 2017 Clean Air Plan control measures. The project's VMT increase would be less than the population increase.	None required.	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact AQ-2. Project construction would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution levels or air quality nuisances.	**AQ-1 Basic Construction Mitigation Measures.** All development facilitated by the project (regardless of whether the development is under the jurisdiction of the SFBAAB or the BAAQMD) shall be required to reduce construction emissions of reactive organic gases, nitrogen oxides, and particulate matter (PM_{10} and $PM_{2.5}$) by implementing the BAAQMD's Basic Construction Mitigation Measures (described below) or equivalent, expanded, or modified measures based on project and site-specific conditions. 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day, with priority given to the use of recycled water for this activity. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping shall be prohibited. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. 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. 6. 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. 7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator. 8. A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. **AQ-2 Additional Construction Mitigation Measures.** In addition to implementation of Mitigation Measure AQ-1, for any project (regardless of whether the development is under the jurisdiction of the SFBAAB or the BAAQMD) that meets the following conditions and as listed in Table 4.3-6, the County shall condition development facilitated by the project to implement BAAQMD CEQA Air Quality Guidelines' Additional Construction Mitigation Measures: 1. Exceed the BAAQMD construction screening threshold of a change in allowable dwelling units of 114 dwelling units for single-family residences or 240 dwelling units for multi-family residences	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	2. Would result in a change in allowable dwelling units of more than 38 units 3. Would require demolition or simultaneous occurrence of more than two construction phases 4. Simultaneous construction of more than one land use type (e.g., a mixed-use project involving commercial and residential) 5. Extensive material transport of more than 10,000 cubic yards In addition to implementation of Mitigation Measure AQ-1, for any Rezoning Sites that meet the criteria listed above, the following measures (or equivalent, expanded, or modified measures based on project- and site-specific conditions) shall be implemented throughout construction of the project: 1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe. 2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. 3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks shall have at maximum 50 percent air porosity. 4. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. 5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. 6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site. 7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12-inch compacted layer of wood chips, mulch, or gravel. 8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent. 9. Minimizing the idling time of diesel powered construction equipment to two minutes. 10. The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NO_X reduction and 45 percent PM reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit	

Impact	Mitigation Measure (s)	Residual Impact
	technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available. 11. Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings). 12. Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NO_x and PM. 13. Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines.	
Impact AQ-3. Development facilitated by the project would not expose sensitive receptors to substantial pollutant concentrations from CO hotspots or TACs. In addition, development facilitated by the project would not site new sensitive land uses near substantial pollutant generating land uses.	None required	Less than significant
Impact AQ-4. Implementation of the project would not create objectionable odors that could affect a substantial number of people.	None required	Less than significant
Biological Resources		
Impact BIO-1. Future development facilitated by the project could impact special status species and their habitat during construction and/or operation.	**BIO-1 Biological Resources Screening and Assessment.** For projects in the BSAs that would require ground disturbance through clearing/grading or vegetation trimming, the project applicant shall engage a qualified biologist (having the appropriate education and experience level) to perform a preliminary Biological Resources Screening and Assessment to determine whether the project has any potential to impact special status biological resources, inclusive of special status plants and animals, sensitive vegetation communities, jurisdictional waters (including creeks, drainages, streams, ponds, vernal pools, riparian areas and other wetlands), critical habitat, wildlife movement area, or biological resources protected under local or regional (City or County) ordinances or an existing Habitat Conservation Plan (HCP) or Natural Community Conservation Plan, including the Santa Rosa Plain Conservation Strategy. If it is determined that the project has no potential to impact biological resources, no further action is required. If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 500 feet around the project footprint, and to determine the potential impacts to those resources. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats,	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	and other resources judged to be sensitive by local, state, and/or federal agencies. If the project would have the potential to impact these resources, the following mitigation measures (Mitigation Measures BIO-2 through BIO-12) shall be incorporated, as applicable, to reduce impacts to a less than significant. Pending the results of the project-specific biological analysis, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, NMFS, CDFW, and/or other local, state, and federal agencies may be required. Note that specific surveys described in the mitigation measures below may be completed as part of the project-specific biological analysis where suitable habitat is present. **BIO-2 Special Status Plant Species Surveys.** If the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) determines that there is potential for significant impacts to federally or state-listed plants or regional population level impacts to species with a CRPR of 1B or 2B from project development, a qualified biologist shall complete surveys for special status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species identified in the project-specific biological analysis. All plant surveys shall be conducted by a qualified biologist during the blooming season prior to initial ground disturbance. All special status plant species identified on site shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the County, and the CDFW and/or USFWS, as appropriate, for review and/or approval. **BIO-3 Special Status Plant Species Avoidance, Minimization, and Mitigation.** If federally and/or state-listed or CRPR 1B or 2 species are found during special status plant surveys (pursuant to Mitigation Measure BIO-2), and would be directly impacted, or there would be a population-level impact to non-listed sensitive species, then the project shall be re-designed to avoid impacting those plant species. Rare and listed plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm. For projects in BSAs located within the Santa Rosa Plain Area, protocol rare plant surveys shall be conducted, and impacts to suitable rare plant habitat mitigated, in accordance with the 2007 USFWS Santa Rosa Plain Programmatic Biological Opinion, as amended in 2020.	

Impact	Mitigation Measure (s)	Residual Impact
	BIO-4 Restoration and Monitoring. Development and/or restoration activities shall be conducted in accordance with a site-specific Habitat Restoration Plan. If federally or state-listed plants or non-listed special status CRPR 1B and 2 plant populations cannot be avoided, and will be impacted by development, all impacts shall be mitigated by the applicant at a ratio not lower than 1:1 and to be determined by the County (in coordination with CDFW and USFWS as and if applicable) for each species as a component of habitat restoration. A qualified biologist shall prepare and submit a restoration plan to the County for review and approval. (Note: if a federally and/or state-listed plant species will be impacted, the restoration plan shall be submitted to the USFWS and/or CDFW for review, and federal and/or state take authorization may be required by these agencies.) The restoration plan shall include, at a minimum, the following components: 1. Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type) 2. Goal(s) of the compensatory mitigation project (type[s] and area[s]) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type[s] to be established, restored, enhanced, and/or preserved) 3. Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions, and values) 4. Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan) 5. Maintenance activities during the monitoring period, including weed removal as appropriate (activities, responsible parties, schedule) 6. Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports) 7. Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of container plants and 30 percent relative cover by vegetation type or other industry standards as determined by a qualified restoration specialist 8. An adaptive management program and remedial measures to address any shortcomings in meeting success criteria 9. Notification of completion of compensatory mitigation and agency confirmation 10. Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism)	

Impact	Mitigation Measure (s)	Residual Impact
	BIO-5 Endangered/Threatened Species Habitat Assessments and Protocol Surveys. Specific habitat assessments and survey protocols are established for several federally- and state-listed endangered or threatened species. If the results of the project-specific biological analysis determine that suitable habitat may be present for any such species, protocol habitat assessments/surveys shall be completed in accordance with CDFW, NMFS, and/or USFWS protocols prior to issuance of any construction permits. If projects are located within the Santa Rosa Plain Area, surveys shall be conducted for CTS in accordance with the Santa Rosa Plain Conservation Strategy (2005). If through consultation with the CDFW, NMFS, and/or USFWS it is determined that protocol habitat assessments/surveys are not required, the applicant shall complete and document this consultation and submit it to the County prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they understand the protocol requirements and shall hire a qualified biologist to conduct protocol surveys. **BIO-6 Endangered/Threatened Animal Species Avoidance and Minimization.** The following measures shall be applied to aquatic and/or terrestrial animal species as determined by the project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1. 1. Ground disturbance shall be limited to the minimum necessary to complete the project. A qualified biologist shall flag the project limits of disturbance. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance. 2. All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and October 31 to avoid impacts to sensitive aquatic species. Any work outside these dates would require project-specific approval from the County and may be subject to regulatory agency approval. 3. All projects occurring within or adjacent to sensitive habitats that may support federally and/or state-listed endangered/threatened species shall have a CDFW- and/or USFWS-approved biologist present during all initial ground disturbing/vegetation clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed, said biologist shall conduct daily pre-activity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the CDFW, NMFS, and/or USFWS, said biologist may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are fully implemented.	

Impact	Mitigation Measure (s)	Residual Impact
	4. No endangered/threatened species shall be captured and relocated without express permission from the CDFW, NMFS, and/or USFWS. 5. If at any time during project construction an endangered/threatened species enters the construction site or otherwise may be impacted by the project, all project activities shall cease. A CDFW/USFWS-approved biologist shall document the occurrence and consult with the CDFW and USFWS, as appropriate, to determine whether it was safe for project activities to resume. 6. For all projects occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete. 7. All vehicle maintenance/fueling/staging shall occur not less than 100 feet from any riparian habitat or water body, including seasonal wetland features. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies. 8. No equipment shall be permitted to enter wetted portions of any affected drainage channel. 9. If project activities could degrade water quality, water quality sampling shall be implemented to identify the pre-project baseline, and to monitor during construction for comparison to the baseline. 10. If water is to be diverted around work sites, the applicant shall submit a diversion plan (depending upon the species that may be present) to the CDFW, RWQCB, USFWS, and/or NMFS for their review and approval prior to the start of any construction activities (including staging and mobilization). If pumps are used, all intakes shall be completely screened with wire mesh not larger than five millimeters to prevent animals from entering the pump system. 11. At the end of each workday, excavations shall be secured with cover or a ramp provided to prevent wildlife entrapment. 12. All trenches, pipes, culverts, or similar structures shall be inspected for animals prior to burying, capping, moving, or filling. 13. The CDFW/USFWS-approved biologist shall remove invasive aquatic species such as bullfrogs and crayfish	

Impact	Mitigation Measure (s)	Residual Impact
	from suitable aquatic habitat whenever observed and shall dispatch them in a humane manner and dispose of properly. 14. Considering the potential for projects to impact federally and state-listed species and their habitat, the applicant shall contact the CDFW and USFWS to identify mitigation banks within Sonoma County during project development. If the results of the project-specific biological analysis (Mitigation Measure BIO-1) determine that impacts to federally and state threatened or endangered species habitat are expected, the applicant shall explore species-appropriate mitigation bank(s) servicing the region for purchase of mitigation credits. If projects are located within the Santa Rosa Plain Area, mitigation for impacts to CTS shall be implemented in accordance with the Santa Rosa Plain Conservation Strategy (2005). 15. For projects occurring in the Petaluma BSA (PET-1 through PET-4), prior to grading and construction in natural areas of containing suitable upland habitat, a qualified biologist shall conduct a preconstruction survey for CTS. The survey shall include a transect survey over the entire project disturbance footprint (including access and staging areas), and mapping of burrows that are potentially suitable for salamander occupancy. If any CTS are detected, no work shall be conducted until the individual leaves the site of their own accord, unless federal and state "take" authorization has been issued for CTS relocation. Typical preconstruction survey procedures, such as burrow scoping and burrow collapse, cannot be conducted without federal and state permits. If any life stage of CTS is found within the survey area, the applicant shall consult with the USFWS and CDFW to determine the appropriate course of action to comply with the FESA and CESA, if permits are not already in place at the time of construction. **BIO-7 Non-Listed Special Status Animal Species Avoidance and Minimization.** The project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) shall identify some or all the below measures that will be required and applicable to the individual project: 1. For non-listed special status terrestrial amphibians and reptiles, a qualified biologist shall complete coverboard surveys within 14 days of the start of construction. The coverboards shall be at least four feet by four feet and constructed of untreated plywood placed flat on the ground as determined by the project-specific biological assessment (pursuant Mitigation Measure BIO-1). The qualified biologist shall check the coverboards once per week for each week after placement up until the start of vegetation removal. The biologist shall capture all non-listed special status and common animals found under the coverboards and shall place them in five-gallon buckets for transportation to relocation sites. The qualified biologist shall review all relocation sites and those sites shall consist of suitable habitat. Relocation	

Impact	Mitigation Measure (s)	Residual Impact
	sites shall be as close to the capture site as possible but far enough away to ensure the animal(s) is not harmed by project construction. Relocation shall occur on the same day as capture. The biologist shall submit CNDDB Field Survey Forms to the CFDW for all special status animal species observed. 2. Prior to construction, a qualified biologist shall conduct a survey of existing buildings to determine if bats are present. The survey shall be conducted during the non-breeding season (November through March). The biologist shall have access to all structures and interior attics, as needed. If a colony of bats is found roosting in any structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.). 3. If bats are roosting in the building during the daytime but are not part of an active maternity colony, then exclusion measures must include one-way valves that allow bats to get out but are designed so that the bats may not re-enter the structure. Maternal bat colonies shall not be disturbed. 4. A qualified biologist shall conduct pre-construction clearance surveys within 14 days of the start of construction (including staging and mobilization). The surveys shall cover the entire disturbance footprint plus a minimum 200-foot buffer, and shall identify all special status animal species that may occur on-site. All non-listed special status species shall be relocated from the site either through direct capture or through passive exclusion. The biologist shall submit a report of the pre-construction survey to the County for their review and approval prior to the start of construction. 5. A qualified biologist shall be present during all initial ground-disturbing activities, including vegetation removal to recover special status animal species unearthed by construction activities. 6. Project activities shall be restricted to daylight hours. 7. Upon completion of the project, a qualified biologist shall prepare a Final Compliance Report documenting all compliance activities implemented for the project, including the pre-construction survey results. The report shall be submitted to the County within 30 days of completion of the project. 8. If special status bat species may be present and impacted by the project, a qualified biologist shall conduct, within 30 days of the start of construction, presence/absence surveys for special status bats in consultation with the CDFW where suitable roosting habitat is present. Surveys shall be conducted using acoustic detectors and by searching tree cavities, crevices, and other areas where bats may roost. If active roosts are located, exclusion devices such as netting shall be installed to discourage bats from occupying the site. If a qualified biologist determines a roost is used by a large number of bats (large hibernaculum), bat boxes shall be installed near	

Impact	Mitigation Measure (s)	Residual Impact
	the project site. The number of bat boxes installed will depend on the size of the hibernaculum and shall be determined through consultation with CDFW. If a maternity colony has become established, all construction activities shall be postponed within a 500-foot buffer around the maternity colony until it is determined by a qualified biologist that the young have dispersed. Once it has been determined that the roost is clear of bats, the roost shall be removed immediately. **BIO-8 Western Pond Turtle Avoidance and Minimization.** For projects located in the Penngrove BSA (PEN-1 through PEN-9), a qualified biologist shall conduct pre-construction clearance surveys for western pond turtle within 14 days prior to the start of construction (including staging and mobilization) in areas of suitable habitat. The biologist shall flag limits of disturbance for each construction phase. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance. If western pond turtles are observed, they shall be allowed to leave the site on their own. **BIO-9 American Badger Avoidance and Minimization.** For projects located in the Petaluma BSA (PET-1 through PET-4), a qualified biologist shall conduct surveys of the grassland habitat on-site to identify any American badger burrows/dens. These surveys shall be conducted not more than 14 days prior to the start of construction. Impacts to active badger dens shall be avoided by establishing exclusion zones around all active badger dens, within which construction related activities shall be prohibited until denning activities are complete or the den is abandoned. A qualified biologist shall monitor each den once per week in order to track the status of the den and to determine when a den area has been cleared for construction. **BIO-10 Pre-construction Surveys for Nesting Birds for Construction Occurring within Nesting Season.** For projects that require the removal of trees or vegetation, construction activities shall occur outside of the nesting season (September 16 to January 31), and no mitigation activity is required. If construction activities must occur during the nesting season (February 1 to September 15), a qualified biologist shall conduct surveys for nesting birds covered by the CGFC no more than 14 days prior to vegetation removal. The surveys shall include the entire disturbance area plus a 200-foot buffer around the site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of 50 feet for non-raptor bird species and at least 150 feet for raptor species. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the	

Impact	Mitigation Measure (s)	Residual Impact
	buffer. The biologist shall submit a report of these preconstruction nesting bird surveys to the County to document compliance within 30 days of its completion. **BIO-11 Worker Environmental Awareness Program.** If potential impacts to special status species are identified in the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), prior to initiation of construction activities (including staging and mobilization), all personnel associated with project construction shall attend Worker Environmental Awareness Program training, conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the BSAs for the project. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of projects. All employees shall sign a form documenting provided by the trainer indicating they have attended the Worker Environmental Awareness Program and understand the information presented to them. The form shall be submitted to the County to document compliance. **BIO-12 Invasive Weed Prevention and Management Program.** For those projects where activity would occur within or adjacent to sensitive habitats, as determined by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), prior to start of construction a qualified biologist shall develop an Invasive Weed Prevention and Management Plan to prevent invasion of native habitat by non-native plant species. A list of target species shall be included, along with measures for early detection and eradication. All disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas. In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six weeks since ground disturbing activities ceased. If exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a qualified biologist and in accordance with the restoration plan. Landscape species shall not include noxious, invasive, and/or non-native plant species that are recognized on the federal Noxious Weed List, California Noxious Weeds List, and/or California Invasive Plant Council Moderate and High Risk Lists.	
Impact BIO-2. Future development facilitated by the project could impact riparian habitat or sensitive natural communities during construction and/or operation.	**BIO-13 Sensitive Natural Community Avoidance.** If sensitive natural communities are identified through the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), the project shall be designed to avoid those communities to the maximum extent possible and all project elements associated with development shall be situated outside of sensitive habitats. Bright orange protective fencing installed at least 30 feet beyond the	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	extent of the sensitive natural community during construction, or other distance as approved by a qualified biologist, to protect them from harm. **BIO-14 Restoration for Impacts to Sensitive Natural Communities.** Impacts to sensitive natural communities (including riparian areas and waters of the state or waters of the U.S. under the jurisdiction of the CDFW, USFWS or RWQCB) shall be mitigated through the funding of the acquisition and in-perpetuity management of similar habitat. The applicant shall provide funding and management of off-site mitigation lands through purchase of credits from an existing, approved mitigation bank or land purchased by the County and placed into a conservation easement or other covenant restricting development (e.g., deed restriction). Internal mitigation lands (internal to the Rezoning Sites), or in lieu funding sufficient to acquire lands, shall provide habitat at a minimum 1:1 ratio for impacted lands, comparable to habitat to be impacted by individual project activity. The applicant shall submit documentation of mitigation funds to the County. 1. **Restoration and Monitoring**. If sensitive natural communities cannot be avoided and will be impacted by future projects, a compensatory mitigation program shall be implemented by the applicant in accordance with Mitigation Measure BIO-4 and the measures set forth by the regulatory agencies during the permitting process. All temporary impacts to sensitive natural communities shall be fully restored to natural condition. **2. Sudden Oak Death**. The applicant shall inspect all nursery plants used in restoration for sudden oak death. Vegetation debris shall be disposed of properly and vehicles and equipment shall be free of soil and vegetation debris before entering natural habitats. Pruning tools shall be sanitized.	
Impact BIO-3. Future development facilitated by the project could impact jurisdictional state or federally protected wetlands during construction and/or operation.	**BIO-15 Jurisdictional Delineation.** If potentially jurisdictional wetlands are identified by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), a qualified biologist shall complete a jurisdictional delineation. The jurisdictional delineation shall determine the extent of the jurisdiction for CDFW, USACE, and/or RWQCB, and shall be conducted in accordance with the requirement set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the County, USACE, RWQCB, and CDFW, as appropriate, for review and approval. Jurisdictional areas shall be avoided to the maximum extent possible. If jurisdictional areas are expected to be impacted, then the RWQCB would require a Waste Discharge Requirement permit and/or Section 401 Water Quality Certification (depending upon whether the feature falls under federal jurisdiction). If CDFW asserts its jurisdictional authority, then a Lake or Streambed Alteration Agreement pursuant to Section 1600 et seq. of the CFGC would also be required prior to construction within the areas of CDFW jurisdiction. If the USACE asserts its authority, then a permit pursuant to Section 404 of the CWA would be required. Furthermore, a	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	compensatory mitigation program shall be implemented by the applicant in accordance with Mitigation Measure BIO-4 and the measures set forth by the regulatory agencies during the permitting process. Compensatory mitigations for all permanent impacts to waters of the U.S. and waters of the state shall be completed at a ratio as required in applicable permits. All temporary impacts to waters of the U.S. and waters of the state shall be fully restored to natural condition. **BIO-16 General Avoidance and Minimization.** Projects shall be designed to avoid potential jurisdictional features identified in jurisdictional delineation reports. Projects that may impact jurisdictional features shall provide the County with a report detailing how all identified jurisdictional features will be avoided, including groundwater draw down. 1. Any material/spoils generated from project activities shall be located away from jurisdictional areas or special status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls (non- monofilament), covers, sand/gravel bags, and straw bale barriers, as appropriate. 2. Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank. 3. Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative will be notified.	
Impact BIO-4. Development facilitated by the project would not impact wildlife movement due to the location of the Rezoning Sites in areas of existing development.	None required	Less than significant
Impact BIO-5. Development facilitated by the project would be subject to the County's ordinances and requirements protecting biological resources, such as trees.	None required	Less than significant
Impact BIO-6. Development facilitated by the project within the Santa Rosa Plain Conservation Strategy Area could conflict with the Plan.	**BIO-17 Consistency with the Santa Rosa Plain Conservation Strategy.** For sites SAN-1 through SAN-10, the Biological Resources Screening and Assessment (Mitigation Measure BIO-1) shall assess projects for impacts to listed species included in the Santa Rosa Plain Conservation Strategy. Impacts to these species shall be evaluated and mitigated per the mitigation measures included in Chapter 5 of the Conservation Strategy.	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Cultural Resources		
Impact CUL-1. The project has the potential to cause a significant impact on a historic resource if development facilitated by the project would cause a substantial adverse change in the significance of that resource.	**CUL-1 Architectural History Evaluation.** For any future project proposed on or adjacent to a property that includes buildings, structures, objects, sites, landscape/site plans, or other features that are 45 years of age or older at the time of or permit application, the project applicant shall hire a qualified architectural historian to prepare an historical resources evaluation. The qualified architectural historian or historian shall meet the Secretary of the Interior's (SOI) Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices recommended by the State Office of Historic Preservation to identify any potential historical resources in the proposed project area. Under the guidelines, properties 45 years of age or older shall be evaluated within their historic context and documented in a technical report and on Department of Parks and Recreation Series 523 forms. The report will be submitted to the County for review prior to any permit issuance. If no historic resources are identified, no further analysis is warranted. If historic resources are identified by the Architectural History Evaluation, the project shall be required to implement Mitigation Measure CUL-2. **CUL-2 Architectural History Mitigation.** If historical resources are identified in an area proposed for redevelopment as the result of the process described in Mitigation Measure CUL-1, the project applicant shall reduce impacts. Application of mitigation shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g. preservation in place). In conjunction with any project that may affect the historical resource, the project applicant shall provide a report identifying and specifying the treatment of character-defining features and construction activities to the County for review and approval, prior to permit issuance, to avoid or substantially reduce the severity of the proposed activity on the historical qualities of the resource. Any and all features and construction activities shall become Conditions of Approval for the project and shall be implemented prior to issuance of construction (demolition and grading) permits. Mitigation measures may include but are not limited to compliance with the Secretary of the Interior's Standards for Treatment of Historic Properties and documentation of the historical resource in the form of a Historic American Building Survey (HABS)-like report. The HABS report shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements.	Significant and unavoidable

Impact	Mitigation Measure (s)	Residual Impact
Impact CUL-2. Development facilitated by the project has the potential to cause a substantial adverse change in the significance of an archaeological resource, including those that qualify as historical resources.	**CUL-3 Phase I Archaeological Resource Study.** Prior to project approval, the project applicant shall investigate the potential to disturb archaeological resources. If the project will involve any ground disturbance, a Phase I cultural resources study shall be performed by a qualified professional meeting the SOI's PQS for archaeology (National Park Service 1983). If a project would solely involve the refurbishment of an existing building and no ground disturbance would occur, this measure would not be required. A Phase I cultural resources study shall include a pedestrian survey of the project site and sufficient background research and field sampling to determine whether archaeological resources may be present. Archival research shall include a records search of the Northwest Information Center no more than two years old and a Sacred Lands File search with the NAHC. The Phase I technical report documenting the study shall include recommendations that must be implemented prior to and/or during construction to avoid or reduce impacts on archaeological resources, to the extent that the resource's physical constituents are preserved or their destruction is offset by the recovery of scientifically consequential information. The report shall be submitted to the County for review and approval, prior to the issuance of any grading or construction permits, to ensure that the identification effort is reasonable and meets professional standards in cultural resources management. Recommendations in the Phase I technical report shall be made Conditions of Approval and shall be implemented throughout all ground disturbance activities. **CUL-4 Extended Phase I Testing.** For any projects proposed within 100 feet of a known archaeological site and/or in areas identified as sensitive by the Phase I study (Mitigation Measure CUL-3), the project applicant shall retain a qualified archaeologist to conduct an Extended Phase I (XPI) study to determine the presence/absence and extent of archaeological resources on the project site. XPI testing shall comprise a series of shovel test pits and/or hand augured units and/or mechanical trenching to establish the boundaries of archaeological site(s) on the project site. If the boundaries of the archaeological site are already well understood from previous archaeological work and is clearly interpretable as such by a qualified cultural resources professional, an XPI will not be required. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s) and any XPI work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4. All archaeological excavation shall be conducted by a qualified archaeologist(s) under the direction of a principal investigator meeting the SOI's PQS for archaeology (National Park Service 1983). If an XPI report is prepared, it shall be submitted to Sonoma County for review and approval prior	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	to the issuance of any grading or construction permits. Recommendations contained therein shall be implemented for all ground disturbance activities. **CUL-5 Archaeological Site Avoidance.** Any identified archaeological sites (determined after implementing Mitigation Measures CUL-3 and/or CUL-4) shall be avoided by project-related construction activities. A barrier (temporary fencing) and flagging shall be placed between the work location and any resources within 60 feet of a work location to minimize the potential for inadvertent impacts. **CUL-6 Phase II Site Evaluation.** If the results of any Phase I and/or XPI (Mitigation Measures CUL-3 and/or CUL-4) indicate the presence of archaeological resources that cannot be avoided by the project (Mitigation Measure CUL-5) and that have not been adequately evaluated for CRHR listing at the project site, the qualified archaeologist will conduct a Phase II investigation to determine if intact deposits remain and if they may be eligible for the CRHR or qualify as unique archaeological resources. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s) and any Phase II work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4. A Phase II evaluation shall include any necessary archival research to identify significant historical associations and mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit. The sample excavation will characterize the nature of the sites, define the artifact and feature contents, determine horizontal and vertical boundaries, and retrieve representative samples of artifacts and other remains. If the archeologist and, if applicable, a Native American monitor (see Mitigation Measure TCR-4) or other interested tribal representative determine it is appropriate, cultural materials collected from the site shall be processed and analyzed in a laboratory according to standard archaeological procedures. The age of the materials shall be determined using radiocarbon dating and/or other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards. The significance of the sites shall be evaluated according to the criteria of the CRHR. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation publication “Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition).” The report shall be submitted to Sonoma County for review and approval prior to the issuance of any grading or construction permits. Recommendations in the Phase II report shall be implemented for all ground disturbance activities.	

Impact	Mitigation Measure (s)	Residual Impact
	CUL-7 Phase III Data Recovery. If the results of the Phase II site evaluation (Mitigation Measure CUL-6) yield resources that meet CRHR significance standards and if the resource cannot be avoided by project construction in accordance with Mitigation Measure CUL-5, the project applicant shall ensure that all recommendations for mitigation of archaeological impacts are incorporated into the final design and approved by the County prior to construction. Any necessary Phase III data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the SOI standards for archaeology according to a research design reviewed and approved by the County prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the California Office of Historic Preservation Planning Bulletin 5 (1991), Guidelines for Archaeological Research Design, or the latest edition thereof. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s) and any Phase III work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4. As applicable, the final Phase III Data Recovery reports shall be submitted to Sonoma County prior to issuance of any grading or construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities. **CUL-8 Cultural Resources Monitoring.** If recommended by Phase I, XPI, Phase II, or Phase III studies (Mitigation Measures CUL-3, CUL-4, CUL-6, and/or CUL-7), the project applicant shall retain a qualified archaeologist to monitor project-related, ground-disturbing activities. If archaeological resources are encountered during ground-disturbing activities, Mitigation Measures CUL-5 through CUL-7 shall be implemented, as appropriate. The archaeological monitor shall coordinate with any Native American monitor as required by Mitigation Measure TCR-4. **CUL-9 Unanticipated Discovery of Archaeological Resources.** If archaeological resources are encountered during ground-disturbing activities, work within 60 feet shall be halted and the project applicant shall retain an archaeologist meeting the SOI's PQS for archaeology (National Park Service 1983) immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of CCR Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. If the	

Impact	Mitigation Measure (s)	Residual Impact
	resource is of Native American origin, implementation of Mitigation Measures TCR-1 through TCR-4 may be required. Any reports required to document and/or evaluate unanticipated discoveries shall be submitted to the County for review and approval. Recommendations contained therein shall be implemented throughout the remainder of ground disturbance activities.	
Impact CUL-3. The discovery of human remains is always a possibility during ground disturbing activities. Ground disturbance associated with development facilitated by the project may disturb or damage known or unknown human remains. This impact would be less than significant with adherence to existing regulations.	None required	Less than significant
Energy		
Impact ENR-1. Development facilitated by the project would not result in a significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources.	None required	Less than significant
Impact ENR-2. Development facilitated by the project would not conflict with or obstruct an applicable renewable energy or energy efficiency plan.	None required	Less than significant
Geology and Soils		
Impact GEO-1. No Rezoning Sites are located in Alquist-Priolo Earthquake Fault Zone, and therefore development facilitated by the project would not directly or indirectly cause substantial adverse effects involving rupture of a known earthquake fault.	None required	No impact
Impact GEO-2. Development facilitated by the project could result in exposure of people or structures to a risk of loss, injury, or death from seismic events. Development facilitated by the project could be located on a geologic unit or soil that is unstable or could become unstable resulting in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. This impact would be less than significant with compliance with applicable laws and regulations.	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact GEO-3. Development facilitated by the project would include ground disturbance such as excavation and grading that would result in loose or exposed soil. This disturbed soil could be eroded by wind or during a storm event, which would result in the loss of topsoil. Adherence to existing permit requirements and County regulations would ensure this impact is less than significant.	None required	Less than significant
Impact GEO-4. Development facilitated by the project may result in the construction of structures on expansive soils, which could create a substantial risk to life or property. This impact would be less than significant with compliance with the requirements of the California Building Code.	None required	Less than significant
Impact GEO-5. Development facilitated by the project would not include septic tanks or alternative wastewater disposal systems on soils incapable of supporting such systems.	None required	No impact
Impact GEO-6. Development facilitated by the project may directly or indirectly destroy a unique paleontological resource or site or unique geologic feature during ground disturbing activities.	**GEO-1 Paleontological Review of Project Plans.** For projects with proposed ground-disturbing activity, the project applicant shall retain a Qualified Professional Paleontologist to review proposed ground disturbance associated with development to: 1. Assess if the project will require paleontological monitoring; 2. If monitoring is required, to develop a project-specific Paleontological Resource Mitigation and Monitoring Program (PRMMP) as outlined in Mitigation Measure GEO-2; 3. Draft the Paleontological Worker Environmental Awareness Program as outlined in Mitigation Measure GEO-3; and 4. Define within a project specific PRMMP under what specific ground disturbing activity paleontological monitoring will be required and the procedures for collection and curation of recovered fossils, as described in Mitigation Measures GEO-4, GEO-5, and GEO-6. The Qualified Paleontologist shall base the assessment of monitoring requirements on the location and depth of ground disturbing activity in the context of the paleontological potential and potential impacts outlined in this section. A qualified professional paleontologist is defined by the SVP standards as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least two years (SVP 2010). The County shall review and approve the assessment before grading permits are issued. **GEO-2 Paleontological Resources Mitigation and Monitoring Program.** For those projects deemed to require a PRMMP under Mitigation Measure GEO-1 above, the Qualified Paleontologist shall prepare a PRMMP for submission to the County prior to the issuance of grading permits. The PRMMP shall include a pre-construction paleontological site assessment and develop procedures and protocol for paleontological monitoring and recordation. Monitoring shall be conducted by a qualified paleontological monitor who meets the minimum qualifications per standards set forth by the SVP. The PRMMP procedures and protocols for paleontological monitoring and recordation shall include: 1. Location and type of ground disturbance requiring paleontological monitoring. 2. Timing and duration of paleontological monitoring. 3. Procedures for work stoppage and fossil collection. 4. The type and extent of data that should be collected with recovered fossils. 5. Identify an appropriate curatorial institution. 6. Identify the minimum qualifications for qualified paleontologists and paleontological monitors. 7. Identify the conditions under which modifications to the monitoring schedule can be implemented. 8. Details to be included in the final monitoring report. Prior to issuance of a grading permit, copies of the PRMMP shall be submitted to the County for review and approval as to adequacy. **GEO-3 Paleontological Worker Environmental Awareness Program (WEAP).** Prior to any ground disturbance within Rezoning Sites underlain by geologic units with high paleontological resource potential, the applicant shall incorporate information on paleontological resources into the Project's Worker Environmental Awareness Training (WEAP) materials, or a stand-alone Paleontological Resources WEAP shall be submitted to the County for review and approval. The Qualified Paleontologist or his or her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff if fossils are discovered by construction staff. The Paleontological WEAP training shall be fulfilled simultaneously with the overall WEAP training, or at the first preconstruction meeting at which a Qualified Paleontologist attends prior to ground disturbance. Printed literature (handouts) shall accompany the initial training. Following the initial WEAP training, all new workers and contractors must be trained prior to conducting ground disturbance work. A sign-in sheet for workers who have	

Impact	Mitigation Measure (s)	Residual Impact

completed the training shall be submitted to the County upon completion of WEAP administration.

GEO-4 Paleontological Monitoring. Paleontological monitoring shall only be required for those ground-disturbing activities identified under Mitigation Measure GEO-1, where construction activities (i.e., grading, trenching, foundation work) are proposed in previously undisturbed (i.e., intact) sediments with high paleontological sensitivities. Monitoring shall be conducted by a qualified professional paleontologist (as defined above) or by a qualified paleontological monitor (as defined below) under the supervision of the qualified professional paleontologist. Monitoring may be discontinued on the recommendation of the qualified professional paleontologist if they determine that sediments are likely too young, or conditions are such that fossil preservation would have been unlikely, or that fossils present have little potential scientific value. The monitoring depth required for each of the Rezoning Sites is provided in Table 4.7-3, in addition to the associated geologic unit.

Table 4.7-3 Rezoning Sites Subject to Mitigation

Potential Rezone Site(s)	Sensitive Geologic Unit(s)	Recommended Monitoring
GEY-1 through GEY-3, GUE-2 through GUE-4, LAR-1 through LAR-8, SAN-1, SAN-3, SAN-5, SAN-10	Quaternary young alluvium (Q, Qal)	None
GEY-4	Quaternary young alluvium (Q, Qal) Early Cretaceous to Late Jurassic Great Valley Complex (KJgvc)	None
GUE-1	Quaternary old alluvial and marine terrace deposits (Qt)	All excavations within native (intact) sediments
FOR-1 through FOR-6, GRA-1, GRA-3 through GRA-5, PET-1 through PET-3	Wilson Grove Formation (Twg, Pwg)	All excavations within native (intact) sediments
GRA-2	Quaternary young alluvium (Qal)	None
SAN-2, SAN-4, SAN-6 through SAN-9, AGU-1 through AGU-3, SON-1 through SON-4	Quaternary old alluvium (Qo)	All excavations within native (intact) sediments

Impact	Mitigation Measure (s)			Residual Impact
	GLE-1, GLE-2	Huichica and Glen Ellen Formations (QT)	All excavations within native (intact) sediments	
	PEN-1 through PEN-9	Petaluma Formation (Pp)	All excavations within native (intact) sediments	
	PET-4	Wilson Grove Formation (Twg, Pwg) Pliocene to Miocene Sonoma Volcanics (Psv, Tsb) mapped within the southeast corner	All excavations within native (intact) sediments None	

The following outlines minimum monitor qualifications and procedures for fossil discovery and treatment:

1. **Monitoring.** Paleontological monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources and meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor. The Qualified Paleontologist will determine the duration and timing of the monitoring based on the location and extent of proposed ground disturbance. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the surface or at depth, they may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Refer to Table 4.7-2 and Table 4.7-3 for a paleontological resource potential summary and recommendations for each of the 59 Rezoning Sites.
2. **Fossil Discoveries.** In the event of a fossil discovery by the paleontological monitor or construction personnel, all work in the immediate vicinity of the find shall cease. A Qualified Paleontologist shall evaluate the find before restarting construction activity in the area. If the Qualified Paleontologist determines that the fossil(s) is (are) scientifically significant; including identifiable specimens of vertebrate fossils, uncommon invertebrate, plant, and trace fossils; the Qualified Paleontologist (or paleontological monitor) shall recover them following standard field procedures for collecting paleontological as outlined in the PRMMP prepared for the project.
3. **Salvage of Fossils.** Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the Qualified Paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. If fossils are discovered, the Qualified Paleontologist (or

Impact	Mitigation Measure (s)	Residual Impact
	Paleontological Monitor) shall recover them as specified in the project's PRMMP. **GEO-5 Preparation and Curation of Recovered Fossils.** Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the University of California Museum of Paleontology), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Paleontologist. **GEO-6 Final Paleontological Mitigation Report.** Upon completion of ground disturbing activity (and curation of fossils if necessary) the Qualified Paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated. The report shall be submitted to the County prior to occupancy permits. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.	
Greenhouse Gas Emissions		
Impact GHG-1. Development facilitated by the Housing Element Update would not meet State GHG goals for 2030 or 2045.	**GHG-1: Comply with BAAQMD Project-Level Land Use Thresholds.** Individual residential projects facilitated by the Housing Element Update project shall comply with the following BAAQMD thresholds for land use projects as defined in the BAAQMD CEQA *Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, published April 2022, or its later adopted successor. Projects on the Rezoning Sites shall include, at a minimum, the following design elements: 1. Buildings a. The project shall not include natural gas appliances or natural gas plumbing. 2. Transportation a. The project shall achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2. As noted in the BAAQMD CEQA *Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, a project designed and built to incorporate these design elements would contribute its fair share to achieve California's long-term climate goals, and an agency reviewing the project under CEQA can conclude that the project would not make a cumulatively considerable contribution to global climate change. If the County adopts a GHG reduction strategy that meets the criteria under CEQA Guidelines Section 15183.5(b), projects may comply with that GHG reduction strategy in	Significant and Unavoidable

Impact	Mitigation Measure (s)	Residual Impact
	lieu of implementing the BAAQMD project-level land use thresholds stated above.	
Hazards and Hazardous Materials		
Impact HAZ-1. Development facilitated by the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, nor through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	None required	Less than significant
Impact HAZ-2. Development facilitated by the project could result in development on sites contaminated with hazardous materials. However, compliance with applicable regulations relating to site remediation would minimize impacts from development on contaminated sites.	None required	Less than significant
Impact HAZ-3. The Rezoning Sites are not located within two miles of an airport. Development facilitated by the project would not result in a safety hazard or excessive noise for people residing or working in or near the Rezoning Sites.	None required	No impact
Impact HAZ-4. Development facilitated by the project would not result in any physical changes that could interfere with or impair emergency response or evacuation. Therefore, the project would not result in interference with these types of adopted plans.	None required	Less than significant
Impact HAZ-5. Development facilitated by the project could expose people or structures to risk of loss, injury, or death involving wildland fires.	Refer to WFR-1: Construction Wildfire Risk Reduction; WFR-2: Landscape Plan Wildfire Risk Reduction; and WFR-3: New Structure Locations.	Significant and unavoidable
Hydrology and Water Quality		
Impact HWQ-1. Development facilitated by the project would not violate water quality standards or Waste Discharge Requirements, or otherwise substantially degrade surface or groundwater quality.	None required	Less than significant
Impact HWQ-2. Development facilitated by the project would not interfere substantially with groundwater recharge such that the	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
project may impede sustainable groundwater management of local groundwater basins.		
Impact HWQ-3. Development facilitated by the project would alter drainage patterns and increase runoff in the Rezoning Sites, but would not result in substantial erosion or siltation on or off site, result in increased flooding on or off site, exceed the capacity of existing or planned stormwater drainage systems, or generate substantial additional polluted runoff.	None required	Less than significant
Impact HWQ-4. Development facilitated by the project would alter drainage patterns on and increase runoff from the Rezoning Sites. The Rezoning Sites within an area at risk from inundation by flood hazard would be required to comply with applicable General Plan goals and policies.	None required	Less than significant
Impact HWQ-5. The Rezoning Sites are not within an area at risk from inundation by seiche or tsunami, and therefore would not be at risk of release of pollutants due to project inundation.	None required	Less than significant
Impact HWQ-6. Development facilitated by the project would comply with adopted water quality control plans and sustainable groundwater management plans applicable to the Rezoning Sites.	None required	Less than significant
Land Use and Planning		
Impact LU-1. Project implementation would provide for orderly development in the unincorporated County and would not physically divide an established community.	None required	Less than significant
Impact LU-2. The project would not result in a significant environmental impact due to a conflict with any land use plan and policy.	None required	Less than significant
Mineral Resources		
Impact MIN-1. Although mineral extraction sites occur throughout the County, none are within the Rezoning Sites.	None required	No impact

Impact	Mitigation Measure (s)	Residual Impact
Noise		
Impact NOI-1. Construction activities associated with development facilitated by the project could result in noise level increases that would exceed applicable construction noise standards at nearby noise sensitive receivers. Operational noise impacts from HVAC units and generators would potentially exceed County standards if located near noise-sensitive land uses. These would be significant impacts and mitigation measures would be required.	**NOI-1 General Construction Activities Noise Reduction Measures.** If construction activities occur during nighttime hours as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation, within 0.5 mile of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), the following measures shall be implemented: 1. Nighttime construction noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m. 2. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis. 3. The analysis of nighttime construction activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider the type of construction equipment to be used and the potential noise levels at noise-sensitive receivers located within 0.5 mile of the Rezoning Site. 4. Provided the nighttime construction noise analysis determines that nighttime noise levels will not exceed 45 dBA L50, 50 dBA L25, 55 dBA L08, or 60 dBA L02 between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures. 5. Provided the nighttime construction noise analysis determines that nighttime noise levels would exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers or performing activities at a further distance from the noise-sensitive land use. **NOI-2 Pile Driver Noise and Vibration Reduction Measures.** If pile driving activities occur within 2.8 miles of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), or, during daytime or nighttime hours, within 160 feet of a vibration-sensitive receiver (residences, research and advanced technology equipment), the following measures shall be implemented: 1. Daytime (7 a.m. to 10 p.m.) a. Pile Driving Vibration i. Use of a pile driver shall not occur within 160 feet of a vibration-sensitive receiver; ii. Daytime pile driving vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	2. Nighttime (10 p.m. to 7 a.m.): a. Pile Driving Noise i. Nighttime pile driving noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m. ii. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis. iii. The analysis of nighttime pile driving activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider the type of pile driver to be used and potential noise levels at noise-sensitive receivers located within 15,000 feet of the Rezoning Site. iv. Provided the analysis concludes that noise levels will not exceed 45 dBA L_{50}, 50 dBA L_{25}, 55 dBA L_{08}, or 60 dBA L_{02} between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures. v. Provided the analysis concludes that pile driving noise levels exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers to reduce noise levels. b. Pile Driving Vibration i. Use of a pile driver shall not occur within 160 feet of a vibration-sensitive receiver. ii. Nighttime pile driving vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers. iii. The project applicant shall retain a qualified consultant to prepare a project-specific construction vibration impact analysis. iv. The analysis of nighttime pile driving vibration shall be completed in accordance with industry standards. The analysis shall consider the type of pile driver to be used and potential vibration levels at vibration-sensitive receivers located within 160 feet of the Rezoning Site. v. Provided the analysis concludes vibration levels do not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, construction may proceed without additional measures. vi. Provided the analysis concludes that pile driving vibration levels exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4	

Impact	Mitigation Measure (s)	Residual Impact
	in/sec PPV, additional measures shall be implemented to reduce vibration levels below the standard. These measures may include, but not be limited to, pre-drilling pile holes, utilizing a vibratory pile driver, or performing pile driving at a further distance from the noise-sensitive land use to reduce vibration levels. **NOI-3 Breaker Noise Reduction Measures**. If construction activities use a breaker noise during nighttime hours as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation, within 0.5 mile of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), one of the following measures shall be implemented: 1. Nighttime breaker noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m. 2. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis. 3. The analysis of nighttime breaker activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider type of breaker used and other factors of the environment and the potential noise levels at noise-sensitive receivers located within 0.5 mile of the Rezoning Site. 4. Provided the nighttime breaker noise analysis determines that nighttime noise levels will not exceed 45 dBA L_{50}, 50 dBA L_{25}, 55 dBA L_{08}, or 60 dBA L_{02} between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures. 5. Provided the nighttime breaker noise analysis determines that nighttime noise levels would exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers or performing breaking at a further distance from the noise-sensitive land use. **NOI-4 Blasting Noise and Vibration Reduction Measures.** If construction activities using blasting occurs during construction of a Rezoning Site, the following measure shall be implemented: 1. Daytime (7 a.m. to 10 p.m.) a. Blasting Vibration i. Daytime blasting vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers	

Impact	Mitigation Measure (s)	Residual Impact
	2. Nighttime (as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation: a. Blasting Noise ii. Nighttime blasting noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m. iii. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis. iv. The analysis of nighttime blasting activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider the blasting plan and potential noise levels at noise-sensitive receivers located within 0.25 mile of the Rezoning Site. v. Provided the analysis concludes that noise levels will not exceed 45 dBA L_{50}, 50 dBA L_{25}, 55 dBA L_{08}, or 60 dBA L_{02} between the hours of 10 p.m. to 7 a.m. construction may proceed without additional measures. vi. Provided the analysis concludes that pile driving noise levels exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers to reduce noise levels. b. Blasting Vibration i. Nighttime blasting vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers within 0.25 mile feet of the Rezoning Site. ii. The project applicant shall retain a qualified consultant to prepare a project-specific construction vibration impact analysis. iii. The analysis of nighttime blasting vibration shall be completed in accordance with industry standards. The analysis shall consider the blasting plan and potential vibration levels at vibration-sensitive receivers located within 0.25 mile of the Rezoning Site. iv. Provided the analysis concludes vibration levels do not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, blasting may proceed without additional measures. v. Provided the analysis concludes that pile driving vibration levels exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the	

Impact	Mitigation Measure (s)	Residual Impact
	structural damage impact to structures of 0.4 in/sec PPV, additional measures shall be implemented to reduce vibration levels below the standard. These measures may include, but not be limited to, blasting mats shall be implemented to reduce vibration levels below the threshold. **NOI-5 HVAC Noise Reduction Measures.** For any individual project that would place one or more HVAC unit(s) within 30 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of the HVAC unit(s) shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses, listed in Table 4.13 4. The analysis shall be completed in accordance with the County's current Guidelines for the Preparation of Noise Analysis. Noise control measures shall include, but are not limited to, the selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers. **NOI-6 Generator Noise Reduction Measures.** If an individual project would place permanent backup generators within 300 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of generators shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses, listed in Table 4.13 4. The analysis shall be completed in accordance with the County's current Guidelines for the Preparation of Noise Analysis. Project specific noise reduction measures shall be implemented into the design plan during construction by the project applicant. Noise control measures that could be implemented include, but are not limited to, the selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.	
Impact NOI-2. If pile driving or blasting is performed during construction, vibration from this equipment may exceed applicable standards.	Refer to NOI-2: Pile Driver and Vibration Reduction Measures and NOI-4: Blasting Noise and Vibration Reduction Measures	Less than significant
Impact NOI-3. There are no Rezoning Sites within two miles of an airstrip or airport or within the noise contours for an airstrip or airport, and no impacts would occur from exposing residents or workers to excessive aircraft noise levels.	None required	No impact
Impact NOI-4. Rezoning Sites located near industrial sources, within the 60 and 65 dB L_{dn} contours of nearby roadways, and/or located near railroad line/crossing may exceed the	**NOI-7 Exterior and Interior Land Use Noise Compatibility Compliance.** Rezoning Sites with that may exceed noise compatibility standards include: GEY-1 through GEY-4, LAR-1, LAR-3, LAR-4, LAR-5, LAR-7, LAR-8, FOR-1, FOR-3, FOR-5, FOR-6, GRA-1, GRA-2, GRA-3, GRA-5, SAN-1 through SAN-10,	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
County's acceptable noise levels of 60 dB L_{dn} or less in outdoor activity areas and interior noise levels of 45 dB L_{dn} or less with windows and doors closed.	GLE-1, AGU-2, AGU-3, PEN-1, PEN-3, PEN-5, PEN-6, PEN-8, PEN-9, PET-1 through PET-4, and SON-1 through SON-4. For Rezoning Sites where exterior noise levels may exceed 60 dB Ldn or greater in outdoor activity areas or where interior noise levels may exceed 45 dB Ldn or greater with windows and doors closed, the project applicant shall coordinate with the project architects and other contractors to ensure compliance with the County's noise standards to reduce noise levels in outdoor activity areas to less than 60 dB Ldn and interior noise levels to less than 45 dB Ldn with windows and doors closed. The specific project-level land use compatibility analysis shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The information in the analysis may include, for exterior areas, the layout and placement of the outdoor area, and for interior areas the wall heights and lengths, room volumes, window and door tables typical for a building plan, as well as information on any other openings in the building shell. With this specific plan information, the analysis shall determine the predicted exterior and interior noise levels at the planned buildings. If predicted noise levels are found to be in excess of the applicable limits, the report shall identify architectural materials or techniques that shall be incorporated into the project to reduce noise levels to the applicable limits. Measures to provide the required noise control may include, but are not limited to: 1. Exterior a) Use of sound walls between the outdoor areas and nearby roadways. b) Placement of the outdoor areas where building attenuation would partially block or fully block the line of sight between the area and nearby roadways. 2. Interior a) Installation of windows, doors, and walls with higher Sound Transmission Class ratings over minimum standards. b) Installation or air conditioning or mechanical ventilation systems to allow windows and doors to remain closed for extended intervals of time so that acceptable interior noise levels can be maintained.	
Population and Housing		
Impact PH-1. Implementation of the project would accommodate an additional 8,246 new residents and 3,312 new housing units in the County. This would exceed population and housing forecasts established in the existing General Plan, but would be consistent with the ABAG population forecasts and the 6th cycle RHNA allocation housing requirements for the 2023-2031 planning period.	None required.	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact PH-2. Development facilitated by the project could displace existing housing or people, necessitating the construction of replacement housing elsewhere.	**PH-1 Relocation Plan.** For Rezoning Sites that contain existing rental housing that would displace individuals during development, the project applicant shall prepare a relocation plan, similar to the requirements of Government Code Section 7260-7277. The relocation plan may include, but not be limited to: 1. Proper notification of occupants or persons to be displaced. 2. Provision of "comparable replacement dwelling" which means decent, safe, and sanitary; and adequate in size to accommodate the occupants. 3. Provision of a dwelling unit that is within the financial means of the displaced person. 4. Provision of a dwelling unit that is not subject to unreasonable adverse environmental conditions. This measure shall apply to future development projects on Rezoning Sites that may displace individuals and is not limited to development undertaken by a public entity or development that is publicly funded. The County shall approve the relocation plan prior to project approval.	Less than significant
Public Services and Recreation		
Impact PS-1. Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered fire facilities to maintain acceptable service ratio response times or other objectives.	None required	Less than significant
Impact PS-2. Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered police facilities to maintain acceptable service ratio response times or other objectives.	None required	Less than significant
Impact PS-3. Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered school facilities, and pursuant to State law, payment of impact fees to mitigate demand on school facilities would be required.	None required	Less than significant
Impact PS-4. Development facilitated by the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks, the construction of which could cause significant	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
environmental impacts, to maintain acceptable service ratios, response times, or other objectives and would not increase the use of existing neighborhood and regional parks such that substantial physical deterioration of the facility would occur or be accelerated.		
Impact PS-5. Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered library or other public facilities to maintain acceptable service ratios, response times, or other objectives, and the payment of property taxes funding library or other public facilities would be required.	None required	Less than significant
Transportation and Traffic		
Impact TRA-1. The addition of vehicle miles traveled (VMT) by drivers coming from development facilitated by the project would result in an exceedance of VMT thresholds and conflict with policies seeking to reduce VMT in Sonoma County.	**TRA-1 Transportation Demand Management Program.** Prior to the issuance of building permits, the project applicant shall develop a Transportation Demand Management (TDM) program for the proposed project, including any anticipated phasing, and shall submit the TDM program to Permit Sonoma for review and approval. The TDM program shall identify trip reduction programs and strategies. The TDM program shall be designed and implemented to achieve trip reductions as required to reduce daily VMT and vehicle trips forecast for the project by 11.5 percent from the base year plus project value to reach the threshold value of 13.0, or other local threshold if one is later adopted, or a state or regional body provides more recent guidance. Trip reduction strategies that may be included in the TDM program include, but are not limited to, the following: 1. Provision of bus stop improvements or on-site mobility hubs 2. Pedestrian improvements, on-site or off-site, to connect to nearby transit stops, services, schools, shops, etc. 3. Bicycle programs including bike purchase incentives, storage, maintenance programs, and on-site education program 4. Enhancements to countywide bicycle network 5. Parking reductions and/or fees set at levels sufficient to incentivize transit, active transportation, or shared modes 6. Cash allowances, passes, or other public transit subsidies and purchase incentives 7. Enhancements to bus service 8. Implementation of shuttle service 9. Establishment of carpool, bus pool, or vanpool programs 10. Vanpool purchase incentives	Significant and Unavoidable

Impact	Mitigation Measure (s)	Residual Impact
	11. Low emission vehicle purchase incentives/subsidies 12. Compliance with a future County VMT/TDM ordinance, if eligible 13. Participation in a future County VMT fee program 14. Participate in future VMT exchange or mitigation bank programs The TDM strategies depend heavily on context and area surrounding the Rezoning Sites. **TRA-2 Construction Traffic Management Plan.** To mitigate potential impacts and disruptions during project construction, the applicant shall submit a Construction Traffic Management Plan for County review and approval. The plan shall include, but not be limited to, the following: 1. A prohibition on all construction truck activity during the period 30 minutes prior to the beginning of school and 30 minutes after the end of the school day. 2. The provision of flaggers at all on-site locations where construction trucks and construction worker vehicles conflict with school vehicle, bicycle, or pedestrian traffic. 3. Preservation of emergency vehicle access. 4. Identification of approved truck routes in communication with the County. 5. Location of staging areas and the location of construction worker parking. 6. Identification of the means and locations of the separation (i.e. fencing) of construction areas. 7. Provision of a point of contact for incorporated and unincorporated Sonoma County residents to obtain construction information, have questions answered and convey complaints. 8. Identification of the traffic controls and methods proposed during each phase of project construction. Provision of safe and adequate access for vehicles, transit, bicycles, and pedestrians. Traffic controls and methods employed during construction shall be in accordance with the requirements of the Manual of Uniform Traffic Control Devices (Federal Highway Administration, 2009 Manual on Uniform Traffic Control Devices with Revisions 1 and 2, May 2012). 9. Provision of notice to relevant emergency services, thereby avoiding interference with adopted emergency plans, emergency vehicle access, or emergency evacuation plans. 10. Maintenance of bicycle and pedestrian access along the project's driveway for the duration of project construction.	
Impact TRA-2. The proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact TRA-3. The proposed project would not result in inadequate emergency access.	None required	Less than significant
Tribal Cultural Resources		
Impact TCR-1. Development facilitated by the project has the potential to impact tribal cultural resources.	**TCR-1 Tribal Cultural Resources Consultation.** If during the implementation of Mitigation Measure CUL-1, archival research results in the identification of an association between a historical built-environment resource and a local (traditionally and culturally affiliated) California Native American tribe, the qualified architectural historian or historian shall confer with the local California Native American tribe(s) on the implementation of Mitigation Measure CUL-2. Throughout the implementation of Mitigation Measures CUL-3 through CUL-9, the qualified archaeologist retained to implement the measures shall confer with local California Native American tribe(s) on the identification and treatment of tribal cultural resources and/or resources of Native American origin not yet determined to be tribal cultural resources through AB 52 consultation. If, during the implementation of Mitigation Measures CUL-3 through CUL-9, a resource of Native American origin is identified, the County shall be notified immediately in order to open consultation with the appropriate local California Native American tribe(s) to discuss whether the resource meets the definition of a tribal cultural resource. **TCR-2 Avoidance of Tribal Cultural Resources.** Development facilitated by the project shall be designed to avoid known tribal cultural resources. Any tribal cultural resource within 60 feet of planned construction activities shall be fenced off to ensure avoidance. The feasibility of avoidance of tribal cultural resources shall be determined by the County and applicant in consultation with local (traditionally and culturally affiliated) California Native American tribe(s). **TCR-3 Tribal Cultural Resources Plan.** A tribal cultural resources Plan shall be required for Rezoning Sites identified as potentially sensitive for tribal cultural resources during consultation with local (traditionally and culturally affiliated) California Native American tribe(s) during the implementation of TCR-1 and/or by the qualified archaeologist during the implementation of CUL-3 through CUL-9. Prior to any development facilitated by the project that would include ground disturbance, the project applicant or its consultant shall prepare a tribal cultural resources treatment plan to be implemented in the event an unanticipated archaeological resource that may be considered a tribal cultural resource is identified during construction. The plan shall include any necessary monitoring requirements, suspension of all earth-disturbing work in the vicinity of the find, avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the local Native Americans and, if applicable, a qualified archaeologist. Examples of appropriate treatment for tribal cultural resources include,	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, and heritage recovery. As appropriate, the tribal cultural resources treatment plan may be combined with any Extended Phase I, Phase II, and/or Phase III work plans or archaeological monitoring plans prepared for work carried out during the implementation of Mitigation Measures CUL-4, CUL-6, CUL-7, or CUL-8. The plan shall be reviewed and approved by the County and the appropriate local California Native American tribe(s) prior to construction to confirm compliance with this measure. **TCR-4 Native American Monitoring.** For Rezoning Sites identified as potentially sensitive for tribal cultural resources through consultation with local California Native American tribe(s) during the implementation of TCR-1, and/or identified as sensitive for cultural resources of Native American origin by the qualified archaeologist during the implementation of CUL-3 through CUL-9, the project applicant shall retain a traditionally and culturally affiliated Native American monitor to observe all ground disturbance, including archaeological excavation, associated with development facilitated by the project. Monitoring methods and requirements shall be outlined in a tribal cultural resources treatment plan prepared under Mitigation Measure TCR-3. In the event of a discovery of tribal cultural resources, the steps identified in the tribal cultural resources plan prepared under Mitigation Measure TCR-3 shall be implemented. **TCR-5 Sensitive Location of Human Remains.** For any development facilitated by the project where human remains are expected to be present based on the results of tribal consultation during the implementation of TCR-1 and/or as identified by the qualified archaeologist, the County shall consult with local California Native American tribe(s) on the decision to employ a canine forensics team. If appropriate, the County shall require the use of a canine forensics team to attempt to identify human remains in a noninvasive way (e.g., non-excavation) for the purpose of avoidance, if avoidance is feasible (see Mitigation Measure TCR-2). Any requirements for the use of a canine forensics team shall be documented in the tribal cultural resources treatment plan prepared under Mitigation Measure TCR-3. Pending the results of any canine investigations, the tribal cultural resources treatment plan may require revision or an addendum to reflect additional recommendations or requirements if human remains are present.	
Utilities		
Impact UTIL-1. Impacts related to stormwater drainage, electric power, natural gas, and telecommunication infrastructure would be less than significant. Impacts related to water and wastewater facilities would be significant due to Rezoning Sites	**UTIL-1 Water and Wastewater Provider Capacity.** Future development proposed on the following sites shall be required to demonstrate that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary	Significant and Unavoidable

Impact	Mitigation Measure (s)	Residual Impact
that are not located adjacent to existing wastewater collection infrastructure; impacts would be less than significant with implementation of mitigation measures. However, water supply impacts would be significant and unavoidable, even with implementation of mitigation measures.	improvements to serve a Rezoning Site will be made prior to occupancy: 1. Rezoning Sites that need to demonstrate capacity from the applicable water service provider: GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4. 2. Rezoning Sites that need to demonstrate capacity from the applicable wastewater service provider GEY-1, GUE-2, GUE-3, LAR-1 through LAR-8, FOR-1, FOR-2, FOR-6, GRA-4, SAN-6, SAN-7, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4. The required documentation shall be provided to the County during the plan review and permit approval process for projects on the above-listed Rezoning Sites.	
Impact UTIL-2. The project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, including the Central Disposal Site. The project would not impair the attainment of solid waste reduction goals and would comply with federal, State, and local statutes and regulations related to solid waste.	None required	Less than significant
Wildfire		
Impact WFR-1. The project includes Rezoning Sites that are in or near an SRA or Very High FHSZs, but development facilitated by the project would not substantially impair an adopted emergency response or evacuation plan.	None required	Less than significant
Impact WFR-2. The project includes Rezoning Sites that are in or near Moderate, High, and Very High FHSZs. Development facilitated by the project would expose project occupants and structures to wildfire risks for sites located in or near (within 2 miles of) SRAs or Very High FHSZs.	**WFR-1 Construction Wildfire Risk Reduction.** The County of Sonoma shall require the following measures during project construction: 1. Construction activities with potential to ignite wildfires shall be prohibited during red-flag warnings issued by the National Weather Service for the site. Example activities include welding and grinding outside of enclosed buildings. 2. Fire extinguishers shall be available onsite during project construction. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher. 3. Construction equipment powered by internal combustion engines shall be equipped with spark arresters. The spark arresters shall be maintained pursuant to manufacturer recommendations to ensure adequate performance. At the County's discretion, additional wildfire risk reduction requirements may be required during construction. The	Significant and Unavoidable

Impact	Mitigation Measure (s)	Residual Impact
	County shall review and approve the project-specific methods to be employed prior to building permit approval. **WFR-2 Landscape Plan Wildfire Risk Reduction.** Project landscape plans shall include fire-resistant vegetation native to Sonoma County and/or the local microclimate of the site and prohibit the use of fire-prone species, especially non-native, invasive species. **WFR-3 New Structure Locations.** Prior to finalizing site plans, proposed structure locations shall, to the extent feasible given site constraints, meet the following criteria: 1. Located outside of known landslide-susceptible areas; and 2. Located at least 50 feet from sloped hillsides. If the location meets the above criteria, no additional measures are necessary. If the location is within a known landslide area or within 50 feet of a sloped hillside, structural engineering features shall be incorporated into the design of the structure to reduce the risk of damage to the structure from post-fire slope instability resulting in landslides or flooding. These features shall be recommended by a qualified engineer and approved by the County prior to the building permit approval.	

1 Introduction

This document is a Program Environmental Impact Report (EIR) that analyzes the proposed Sonoma County (County) Housing Element Update Project (hereafter also referred to as the "proposed project" or "project"). This section discusses (1) the purpose of this Program EIR; (2) the type of environmental document prepared and future streamlining opportunities; (3) the purpose and legal basis for preparing an EIR; (4) the content and format of the Program EIR; (5) the baseline for existing conditions; (6) the public review and participation process; (7) the scope and content of the Program EIR; (8) the lead, responsible and trustee agencies pursuant to California Environmental Quality Act (CEQA); and (9) an overview of the environmental review process required under the CEQA. The proposed project is described in detail in Section 2, *Project Description*.

1.1 Statement of Purpose

This Program EIR has been prepared in compliance with the CEQA Statutes and Guidelines (see *CEQA Guidelines* Section 15121[a]). In general, the purpose of an EIR is to:

1. Analyze the environmental effects of the adoption and implementation of the project;
2. Inform decision-makers, responsible and trustee agencies and members of the public as to the range of the environmental impacts of the project;
3. Recommend a set of measures to mitigate significant adverse impacts; and
4. Analyze a range of reasonable alternatives to the proposed project.

As the lead agency for preparing this Program EIR, the County of Sonoma will rely on the EIR analysis of environmental effects in their review and consideration of the proposed project prior to approval.

1.2 Type of Environmental Document

This document is a Program EIR. *CEQA Guidelines* Section 15168(a) states that:

> A Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically; (2) as logical parts in a chain of contemplated actions; (3) in connection with issuance of rules, regulations, plans, or other general criteria, to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

As a programmatic document, this EIR presents a regionwide assessment of the impacts of the proposed project. Analysis of site-specific impacts of individual projects is not required in a Program EIR, unless components of the program are known in sufficient detail. Many specific projects are not currently defined to the level that would allow for such an analysis. Individual specific environmental analysis of each project will be performed as necessary by the County prior to each project being considered for approval. This Program EIR serves as a first-tier CEQA environmental document supporting second-tier environmental documents, if required, for development facilitated by the project on any of the 59 Rezoning Sites.

Project applicants implementing subsequent projects may undertake future environmental review depending on the results of the analysis in this Program EIR and requirements of the mitigation measures. If project applicants are required to prepare subsequent environmental documents, they may incorporate by reference the appropriate information from this Program EIR regarding secondary effects, cumulative impacts, broad alternatives and other relevant factors. If the County finds that implementation of a later activity would have no new effects and that no new mitigation measures would be required, that activity would require no additional CEQA review and a consistency finding would be prepared. Where subsequent environmental review is required, such review would focus on significant effects specific to the project, or its site, that have not been considered in this Program EIR (*CEQA Guidelines* Section 15168).

CEQA Guidelines Section 15151 provides the following standards related to the adequacy of an EIR:

> An Environmental Impact Report should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to decide which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have looked not for perfection; but for adequacy, completeness, and a good faith effort at full disclosure.

CEQA Guidelines Section 15146 further provides the following additional standards related to the adequacy of an EIR:

> The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.
>
> (a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.
>
> (b) An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption, or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.

1.2.1 Intent of the Program EIR

The intent of this Program EIR is to enable development facilitated by the project to be constructed by-right. Projects that are consistent with County regulations, including zoning, would require no additional CEQA review, but applicants would be responsible for implementing applicable mitigation measures. The recommended mitigation measures, once adopted by the Board of Supervisors, will be coded to the Rezoning Sites in the County's permitting system as appropriate and delineated in this Program EIR, and adopted as a set of supplemental standard conditions of approval that will be published on Permit Sonoma's website and apply to future development on the Rezoning Sites.

1.2.2 Tiering Opportunities

For all other types of projects proposed to be carried out or approved by a lead agency within the region, the lead agency may use this Program EIR for the purposes of other allowed CEQA tiering

(PRC Sections 21068.5, 21093-21094, *CEQA Guidelines* 15152, 15385). Tiering is the process by which general matters and environmental effects in an EIR prepared for a policy, plan, program, or ordinance are relied upon by a narrower second-tier or site-specific EIR (PRC Section 21068.5). Moreover, by tiering from this Program EIR (once certified by the County Board of Supervisors), a later tiered EIR would not be required to examine effects that (1) were mitigated or avoided in this EIR, (2) were examined at a sufficient level of detail in this Program EIR to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project (PRC Section 21094).

1.3 Purpose and Legal Authority

The proposed project requires the discretionary approval of the Sonoma County Board of Supervisors; therefore, the project is subject to the environmental review requirements of CEQA. In accordance with *CEQA Guidelines* Section 15121 (California Code of Regulations, Title 14), the purpose of this EIR is to serve as an informational document that:

> "...will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."

This Program EIR is to serve as an informational document for the public and County of Sonoma decision makers. The process will include a public hearing before Board of Supervisors to consider certification of a Final Program EIR and approval of the proposed Housing Element.

1.4 EIR Content and Format

This document includes discussions of environmental impacts related to several issue areas. The analysis of environmental impacts identifies impacts by category: significant and unavoidable, significant but mitigable, less than significant, and no impact or beneficial. It proposes mitigation measures, where feasible, for identified significant environmental impacts to reduce project generated impacts. The responsible agency for each mitigation measure is also identified. It is the responsibility of the lead agency implementing specific projects to conduct the necessary environmental review consistent with CEQA and where applicable, incorporate mitigation measures provided herein and developed specifically for the project to minimize environmental impacts and/or reduce impacts to less than significant.

This Program EIR has been organized into seven sections. These include:

1.0 **Introduction.** Provides the project background, description of the type of environmental document and CEQA streamlining opportunities, and information about the EIR content, format, and public review process.

2.0 **Project Description.** Presents and discusses the project objectives, project location and specific project characteristics.

3.0 **Environmental Setting.** Provides a description of the existing physical setting of the project area and an overview of the progress in project implementation.

4.0 **Analysis of Environmental Issues.** Describes existing conditions found in the project area and assesses potential environmental impacts that may be generated by implementing the proposed project, including cumulative development in the region. These potential project

impacts are compared to "thresholds of significance" to determine the nature and severity of the direct and indirect impacts. Mitigation measures, intended to reduce adverse, significant impacts below threshold levels, are proposed where feasible. Impacts that cannot be eliminated or mitigated to less than significant levels are also identified.

5.0 **Other CEQA Required Discussions.** Identifies growth inducing impacts that may result from implementation of the proposed project, as well as long-term effects of the project and significant irreversible environmental changes.

6.0 **Alternatives.** Describes alternatives to the proposed project and compares each alternative's environmental impacts to the proposed project.

7.0 **References/Preparers.** Lists all published materials, federal, state, and local agencies, and other organizations and individuals consulted during the preparation of this Program EIR. It also lists the Program EIR preparers.

1.5 Existing Conditions and Baseline

As outlined by *CEQA Guidelines* Section 15125, an EIR must include a description of the physical environmental conditions in the project vicinity. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts. Generally, the lead agency should describe physical environmental conditions as they exist at the time the Notice of Preparation (NOP) is published. For purposes of this Program EIR, the baseline was established on June 15, 2022, when the County published the NOP. Physical conditions that may have changed after this day have been included for informational purposes only.

1.6 Public Review and Participation Process

The County of Sonoma distributed an NOP of the Program EIR for a 30-day agency and public review period commencing June 15, 2022, and closing July 15, 2022. In addition, the County held a virtual Scoping Meeting on June 28, 2022. The meeting, held from 6:00 p.m. to 7:00 p.m., was aimed at providing information about the proposed project to members of public agencies, interested stakeholders and residents/community members. Due to the COVID-19 pandemic, the virtual meeting was held through an online meeting platform and a call-in number. The County received letters from two agencies and one person in response to the NOP during the public review period. The NOP and scoping comment letters received are presented in Appendix NOP of this Program EIR. Table 1-1 summarizes the content of the letters and verbal comments and where the issues raised are addressed in the Program EIR.

Table 1-1 NOP Comments and EIR Response

Commenter	Comment/Request	How and Where It Is Addressed
Agency Comments		
California Department of Transportation (Caltrans)	The commenter notes a vehicle miles traveled (VMT) analysis may be required as part of CEQA and lists components that analysis may include, such as travel demand management, and transportation impact fees. The commenter also states that any Caltrans facilities impacted by the project must meet American Disabilities Act (ADA) Standards after project completion, and the project must maintain bicycle and pedestrian access during construction.	See Section 4.16, *Transportation*, and Appendix TRA for details regarding transportation impacts.
Native American Heritage Commission	The commenter mentions requirements under CEQA for tribal consultation and summarizes requirements under AB 52 and SB 18, along with recommendations for conducting cultural resources assessments.	See Section 4.17, *Tribal Cultural Resources*, for details regarding tribal cultural resources.
Public Comments		
Rick Coates	The commenter states that the EIR should compare the advantages of building new housing near train stations rather than bus stops. The commenter also states the EIR should evaluate the projected effect on VMT, the projected effect on greenhouse gas (GHG) emissions, and the potential for fire at the selected Site locations.	The first comment does not pertain to the scope of the EIR. However, it is noted and will be considered by the decision makers prior to a decision on the project. See Section 4.8, *Greenhouse Gas Emissions,* for details regarding GHG impacts, Section 4.16, *Transportation*, and Appendix TRA for details regarding transportation impacts, and Section 4.19, *Wildfire*, for details regarding wildfire impacts.

1.7 Scope and Content

An NOP was prepared and circulated (Appendix NOP), and responses received on the NOP were considered when setting the scope and content of the environmental information in this Program EIR. Sections 4.1 through 4.19 address the resource areas outlined in the bullet points below. Section 5, *Other CEQA Required Discussions*, covers topics including growth-inducing effects, irreversible environmental effects, and significant and unavoidable impacts. Environmental topic areas that are addressed in this Program EIR include:

1. Aesthetics
2. Agriculture and Forestry Resources
3. Air Quality
4. Biological Resources
5. Cultural Resources
6. Energy
7. Geology and Soils
8. Greenhouse Gas Emissions
9. Hazards and Hazardous Materials
10. Hydrology and Water Quality

11. Land Use and Planning
12. Mineral Resources
13. Noise
14. Population and Housing
15. Public Services and Recreation
16. Transportation
17. Tribal Cultural Resources
18. Utilities and Service Systems
19. Wildfire

In preparing the Program EIR, use was made of pertinent County policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list is contained in Section 7, *References and Preparers*.

The alternatives section of the Program EIR (Section 6) was prepared in accordance with *CEQA Guidelines* Section 15126.6 and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the project while feasibly attaining most of the basic project objectives. In addition, the alternatives section identifies the "environmentally superior" alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required "No Project" alternative and two alternative development scenarios for the project area.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. *CEQA Guidelines* Section 15151 provides the standard of adequacy on which this document is based. The *Guidelines* state:

> An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.

1.8 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define lead, responsible and trustee agencies. The County of Sonoma is the lead agency for the project because it holds principal responsibility for approving the project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. The California Department of Housing and Community Development (HCD) reviews and determines whether the proposed project complies with State housing law, but is not a responsible agency involved with CEQA. There are no responsible agencies for this project.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. There are no trustee agencies for the Program EIR itself. As a programmatic document, implementation of the proposed project would not directly cause development in areas where trustee agencies mentioned in *CEQA Guidelines* Section 15386 have jurisdiction. However, potential future development projects facilitated by the project could be located on lands under trustee agency jurisdiction, at which time subsequent environmental review would occur.

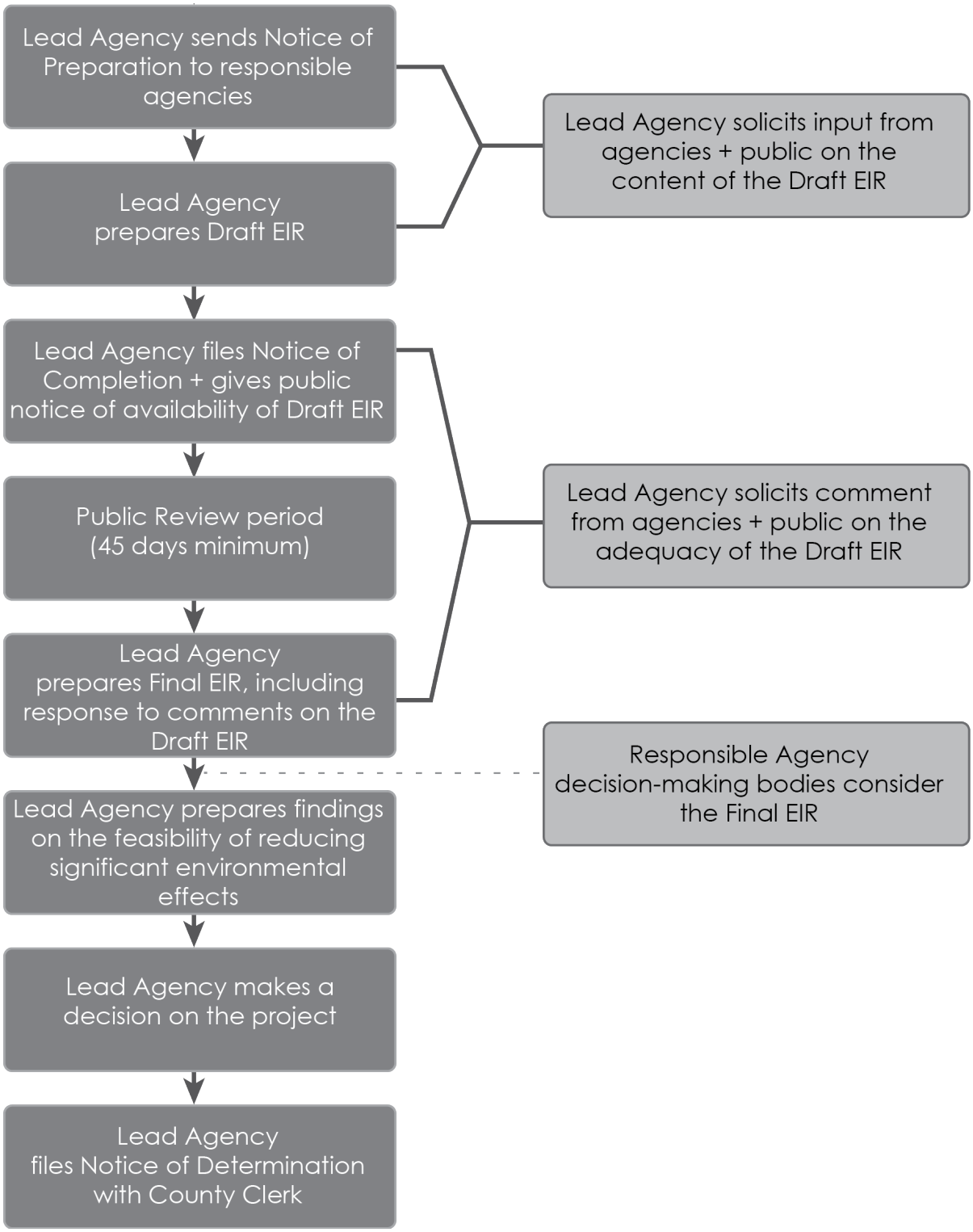
1.9 Environmental Review Process

The CEQA environmental impact review process is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

1. **Notice of Preparation (NOP)**. After deciding that an EIR is required, the lead agency (County of Sonoma) must file a NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; PRC Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days.
2. **Draft Program EIR Prepared.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion (NOC).** The lead agency must file a NOC with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the NOC in the County Clerk's office for 30 days (PRC Section 21091) and send a copy of the NOC to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (PRC Section 21104 and *CEQA Guidelines* Section 15088). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (PRC Section 21091).
4. **Final EIR.** A Final EIR must include: a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.
5. **Certification of Final Program EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision making body reviewed and considered the information in the Final EIR prior to approving a project (*CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations**. For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.

8. **Mitigation Monitoring or Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination (NOD).** The lead agency must file a NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (PRC Section 21167[c]).

Figure 1-1 Environmental Review Process



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2 Project Description

This section describes the proposed project, including the project sponsor and lead agency contact, regulatory setting, project background project characteristics, project objectives, and discretionary actions needed for approval. This Environmental Impact Report (EIR) identifies inventory sites included in the Housing Element; however, the County Board of Supervisors has the authority to remove sites from the Housing Element based on public comment or for other reasons, and the analysis is focused on sites that would be rezoned to allow for higher density housing. The Housing Element also includes projects already in the development pipeline, which may have been analyzed separately for California Environmental Quality Act (CEQA) purposes and therefore are not the focus of analysis in this EIR.

2.1 Project Title

Sonoma County Housing Element Update (project)

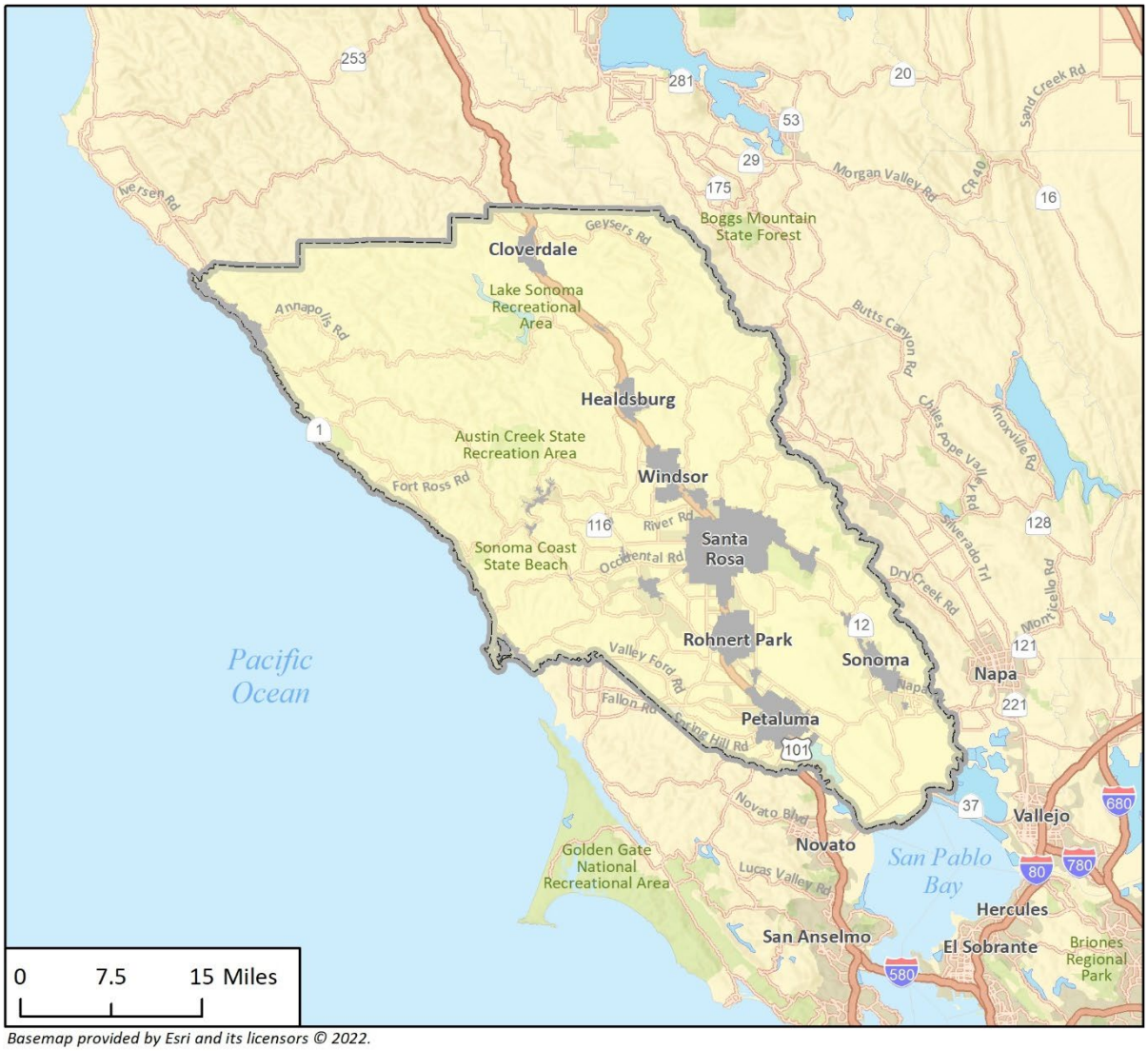
2.2 Project Sponsor and Contact Person

Sonoma County Permit and Resource Management Department (Permit Sonoma)
2550 Ventura Avenue
Santa Rosa, California 95403
Eric Gage, Planner III
(707) 565-1391

2.3 Project Location

The proposed project encompasses all of Sonoma County, located on the northern coast of California (Figure 2-1). The County is bordered by Mendocino County to the north, Lake and Napa Counties to the east, Marin County and the San Pablo Bay to the south, and the Pacific Ocean to the west. Sonoma County is regionally accessible by State Route (SR) 101, which crosses the County from north to south.

Figure 2-1 Project Location



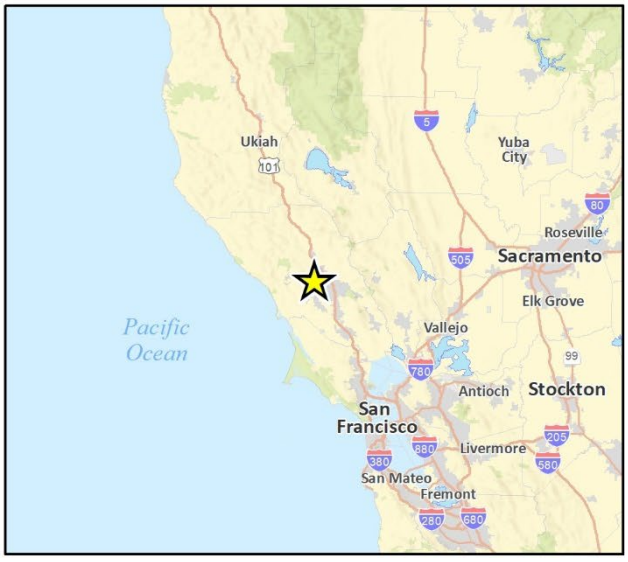
Basemap provided by Esri and its licensors © 2022.

Project Location

Sonoma County

Incorporated Cities

N



2.4 Regulatory Setting

The Housing Element is one of the State-mandated elements of the General Plan. The current 5th cycle Housing Element was adopted in 2015 and covers a planning period ending in early 2023. The Housing Element identifies the County's housing conditions and needs, and establishes the goals, objectives, and policies that comprise the County's strategy to accommodate projected housing needs, including the provision of adequate housing for low-income households and for special-needs populations (e.g., unhoused people, seniors, single-parent households, large families, and persons with disabilities).

Like all cities and counties in California, the County of Sonoma is required to update the Housing Element of its General Plan to cover the 2023-2031 planning period. The Housing Element must address new state requirements, such as "affirmatively furthering fair housing" and ensuring compliance with permitting requirements in state law.

The 2023-2031 Housing Element would bring the element into compliance with State legislation passed since adoption of the 2015-2023 Housing Element and with the current Association of Bay Area Governments' (ABAG) Regional Housing Needs Allocation (RHNA). The ABAG Executive Board adopted the 6th cycle Final RHNA on December 16, 2021. It includes a "fair share" allocation for meeting regional housing needs for each community in the ABAG region.

The 2023-2031 Housing Element includes the following components, as required by State law:

1. Review of the 2015-2023 Housing Element to identify progress and evaluate the effectiveness of previous policies and programs.
2. An assessment of the County's population, household, and housing stock characteristics, existing and future housing needs by household types, and special needs populations.
3. An analysis of resources and constraints related to housing production and preservation, including governmental regulations, infrastructure requirements and market conditions such as land, construction, and labor costs as well as restricted financing availability.
4. Identification of the County's quantified objectives for the 6th cycle RHNA and inventory of sites determined to be suitable for housing.
5. A Housing Plan to address the County's identified housing needs, including housing goals, policies, and programs to facilitate the 6th cycle Housing Element Update.

2.5 Project Background

Like many other counties in California, Sonoma County is known for its high cost of living and lack of affordable, available housing. New construction in the County has not kept up with housing demand over the last half decade, and recent wildfires have destroyed over 4,000 housing units countywide, exacerbating an already dire housing crisis. Proper location is an important consideration for new housing in the Unincorporated County, as there has been a long-standing countywide commitment to avoid sprawl and protect agricultural land and open space. The county is largely rural, with limited urban areas. There are strong General Plan policies that protect voter-approved Community Separators and Urban Growth Boundaries, and facilitate city- and community-centered growth within General Plan-designated Urban Service Areas where public sewer and water are available and higher densities of housing could be built.

In 2020, Permit Sonoma initiated the Rezoning Sites for Housing Project, and it circulated a Draft EIR for the project in May 2021 (SCH No. 2020030351). The Rezoning Sites for Housing Project identified 59 Potential Sites to be added to the County's Housing Element site inventory based on public input and the following basic requirements:

1. Site must be located in the Unincorporated County.
2. Site must be located within an established Urban Service Area where public sewer and water service is available.
3. Site must not be located within a Community Separator.
4. If a site is near an incorporated city, it must not be located outside of a city's Urban Growth Boundary.

In addition to the requirements detailed above, Potential Sites were evaluated against specific criteria set forth in the General Plan to be used in considering which sites to rezone for housing (Housing Element Policy HE-2f and Programs 11 and 20). These factors include proximity to jobs, transit, services, and schools. The Rezoning Sites for Housing Project was ultimately intended to implement existing General Plan policies and programs that require the County to identify urban sites near jobs and transit which could appropriately accommodate additional housing. The project was also intended to identify appropriate sites on which to place the Workforce Housing (WH) Combining District, which would allow the development of jobs and/or housing on the same site or within walking distance from one another. Eight sites (identified in Table 2-2, below) that were evaluated as part of the Rezoning Sites for Housing Project were already included in the County's Housing Element site inventory at lower densities; changes in State law give increased scrutiny to the continuing identification of sites already in inventory. Rezoning of those sites could have allowed them to remain in the inventory. However, the environmental review process was anticipated to further refine the list of sites with the potential for rezoning.

Following circulation of the Draft EIR in May 2021, Permit Sonoma determined that, due to an imminent Housing Element Update, it would not move forward with rezoning the 59 sites identified as a part of the previous effort as a separate project and instead would incorporate rezoning of these sites as one component of the broader Housing Element update. Accordingly, the Board of Supervisors did not certify the Rezoning Sites for Housing Project Draft EIR. Just as the Housing Element Update is a different project from the Rezoning Sites project, this EIR for the Housing Element Update is a new and distinct document. To that end, this EIR incorporates some information from the Rezoning Sites Draft EIR, as appropriate, but it is a new and distinct document that analyzes the environmental effects of the comprehensive Housing Element Update throughout the County.

2.6 Project Characteristics

The proposed project analyzed in this EIR would update the County's current Housing Element, including goals, objectives, policies, and implementing programs to further the goal of meeting the existing and projected housing needs of all household income levels of the County. The Housing Element Update applies to all geographic areas located within unincorporated Sonoma County. The proposed project provides evidence of the County's ability to accommodate the RHNA through the year 2031, as established by the Association of Bay Area Governments (ABAG), and identifies any rezone program needed to reach the required housing capacity. The proposed project would be consistent with existing General Plan policies and programs, including Policy HE-2f, to consider a

variety of sites for higher-density and affordable housing, and Housing Element Programs 11 and 20, which encourage the identification of urban sites near jobs and transit to appropriately accommodate additional housing. Overall, the proposed project includes (1) an update to the Sonoma County Housing Element; (2) a General Plan Map amendment as necessary and, where applicable, area plan amendments to change land uses and densities on identified sites; and, (3) rezoning of up to 59 sites to match new General Plan land uses or densities and/or to add the WH Combining District. Environmental analysis will focus on the 59 sites that will be rezoned, as other Housing Inventory Sites would not change from their baseline condition.

The updated Housing Element also includes a program for rezoning under Senate Bill (SB) 10. Senate Bill 10 provides a streamlined process for local governments to increase residential density up to 10 dwelling units per parcel on eligible parcels, provided the parcel is qualifies under SB 10 as a transit-rich or urban infill site. The Housing Element proposes to allow sites within census-designated urbanized areas or urban clusters and urban service areas that are zoned R1 (Low-Density Residential) and located outside of both the High and Very High Wildfire Hazard Severity Zones to allow additional units based on parcel size.

In addition, the updated Housing Element proposes Program 15d, which would result in revisions to current limitations on cottage housing developments. Cottage housing developments are allowed on parcels of 8,000 square feet or more in the R1 (Low Density Residential) and R2 (Medium-Density Residential) zones within Urban Service Areas. Once the minimum parcel size has been met, one cottage is allowed per 2,500 square feet of lot area for an effective density of 17 units per acre. The total building square footage for a cluster of three cottages is 2,700 square feet unless a use permit has been granted. Program 15d would revise the by-right allowance for cottage housing developments from three units to four units per parcel before a use permit is required.

2.6.1 Housing Element Update

The Housing Element Update presents a comprehensive set of housing policies and actions for the years 2023-2031. It would provide the County with a “road map” for accommodating its future housing demand and would guide decisions that impact housing for the next eight years. The Housing Element is comprised of the following major components:

1. Review of effectiveness of existing Housing Element and its goals, policies, and programs
2. Assessment of existing and projected housing needs
3. Identification of resources – financial, land, administrative
4. Evaluation of constraints to housing
5. Affirmatively Furthering Fair Housing analysis
6. Housing Plan – goals, policies, and programs
7. Housing site inventory

2.6.2 RHNA Allocation

ABAG has allocated the region’s 441,176 housing unit growth needs between each city and county in its region through a process called the RHNA. As shown in Table 2-1 Sonoma County’s RHNA allocation for the 2023-2031 planning period is 3,824 units, which is distributed among four income categories (ABAG 2021). For the last (5th) RHNA cycle, the County’s final unit allocation was 515 units.

Table 2-1 RHNA Allocation and Percentage of Income Distribution for Sonoma County

Income Level	Percent of Area Median Income	Units	Percent
Very Low	0-50%	1,024	27%
Low	51-80%	584	15%
Moderate	81-120%	627	16%
Above Moderate	>120%	1,589	42%
Total	--	3,824	**100%**

Source: ABAG 2021

The RHNA represents the minimum number of housing units that the County is required to plan for in its housing element by providing "adequate sites" through the General Plan and zoning.

2.6.3 Housing Site Inventory

Sonoma County has identified 79 total sites for the 6th cycle Housing Element site inventory that would satisfy the RHNA allocation (refer to Figure 2-2). Of these 79 sites, there are 59 Rezoning Sites in the urban areas of unincorporated Sonoma County that are viable for rezoning to accommodate new housing. The remaining 20 sites on the inventory are already zoned for residential units at an adequate density to meet the County's RHNA goals and do not require rezoning. Since publication of the Notice of Preparation on June 30, 2022, the County determined that seven of the 59 Rezoning Sites could not be included in the site inventory for a variety of reasons. However, the environmental analysis in this EIR includes all 59 sites as a conservative assumption.

The inventory sites, including the Rezoning Sites, are shown in detail in Figure 2-3 through Figure 2-13 and correspond to the list provided in Table 2-2. Not all parcels have street addresses at this time. Sites near Geyserville, Larkfield, Santa Rosa, Penngrove, and Petaluma are regionally accessible from Highway 101; sites near Guerneville, Forestville, and Graton are regionally accessible from State Route 116; and sites near Glen Ellen, Agua Caliente, Sonoma, and Eldridge are regionally accessible from State Route 12. All 59 Rezoning Sites are within General Plan-designated Urban Service Areas,[1] and near incorporated areas, within voter-approved Urban Growth Boundaries.[2]

The designation of a site as part of the housing inventory does not mean it would be developed during 2023-2031, or that a specific project has been proposed there. It simply means the site has the potential to support housing during the 8-year time period, as well as physical characteristics that are conducive to housing development. The Housing Element includes proposed policies and programs to make development on these sites more viable. This is particularly true on the higher density sites. Some of these sites would require rezoning to produce the number of required units; this is addressed in Section 2.6.4 *Rezoning and General Plan Amendments*, below.

Some of the Housing Element programs are carried forward from the existing 2015-2023 Housing Element while others have been newly added. New programs typically respond to new State laws, the findings of the Housing Needs Assessment and Constraints Analysis, evolving market conditions, and the substantially increased RHNA assignment given to the County for the 2023-2031 Housing Element.

[1] Urban Service Areas are the geographical areas within an Urban Service Boundary that is designated for urban development in the County's Land Use Element.
[2] Urban Growth Boundaries are voter designated limits to the urban development of a city.

New measures that respond directly to the constraints analysis include specific actions to amend zoning regulations, develop new zoning regulations, or modify processes and procedures. Some of the programs would be implemented concurrently with the adoption of the Housing Element, but most are scheduled for implementation during the first three years of the planning period.

Table 2-2 Inventory Site Information

Site ID	Site Address	Assessor's Parcel Number	Nearest Community	Corresponding Figure No.	Rezone Site?
GEY-1	21837 Geyserville Avenue	140-180-035	Geyserville	2-2	Yes
GEY-2	21403 Geyserville Avenue	140-150-008	Geyserville	2-2	Yes
GEY-3	21413 Geyserville Avenue	140-150-004	Geyserville	2-2	Yes
GEY-4	21421 Geyserville Avenue	140-150-001	Geyserville	2-2	Yes
GEY-5	80 Highway 128	140-100-004	Geyserville	2-2	No
GEY-6	21322 Geyserville Avenue	140-150-012	Geyserville	2-2	No
GEY-7	Geyser Ridge	140-160-011	Geyserville	2-2	No
GUE-1	14156 Sunset Avenue	070-070-040	Guerneville	2-3	Yes
GUE-2	16450 Laughlin Road	069-270-002	Guerneville	2-3	Yes
GUE-3	16500 Cutten Court	069-280-043	Guerneville	2-3	Yes
GUE-4	16050 Laughlin Road	069-230-007	Guerneville	2-3	Yes
GUE-5	16451 River Road	071-180-014	Guerneville	2-3	No
GUE-6	17081 CA-116	071-200-003	Guerneville	2-3	No
LAR-1	5146 Old Redwood Highway	039-320-051	Larkfield	2-4	Yes
LAR-2	201 Wikiup Drive	039-040-040	Larkfield	2-4	Yes
LAR-3	1 Airport Boulevard	039-025-060	Larkfield	2-4	Yes
LAR-4	245 Airport Boulevard	039-025-026	Larkfield	2-4	Yes
LAR-5	175 Airport Boulevard	039-025-028	Larkfield	2-4	Yes
LAR-6	145 Wikiup Drive	039-040-035	Larkfield	2-4	Yes
LAR-7	5495 Old Redwood Highway	039-380-018	Larkfield	2-4	Yes
LAR-8	5224 Old Redwood Highway	039-390-022	Larkfield	2-4	Yes
LAR-9	5200 Fulton Road	039-025-053	Larkfield	2-4	No
LAR-10	5368 Fulton Road	039-380-027	Larkfield	2-4	No
FOR-1	6555 Covey Road	083-073-017	Forestville	2-5	Yes
FOR-2	6898 Nolan Road	083-120-062	Forestville	2-5	Yes
FOR-3	6220 Highway 116 N	084-020-004	Forestville	2-5	Yes
FOR-4	6090 Van Keppel Road	083-073-010	Forestville	2-5	Yes
FOR-5	6475 Packing House Road	084-020-003	Forestville	2-5	Yes
FOR-6	6250 Forestville Street	084-020-011	Forestville	2-5	Yes
FOR-7	Mirabel Road and Highway 116	083-090-085	Forestville	F2-5	No
GRA-1	9001 Donald Street	130-165-001	Graton	2-6	Yes
GRA-2	3400 Ross Road	130-090-009	Graton	2-6	Yes
GRA-3	3155 Frei Road	130-180-079	Graton	2-6	Yes
GRA-4	3280 Hicks Road	130-146-003	Graton	2-6	Yes

Site ID	Site Address	Assessor's Parcel Number	Nearest Community	Corresponding Figure No.	Rezone Site?
GRA-5	8525 Graton Road	130-176-013	Graton	2-6	Yes
SAN-1	3525 Brooks Avenue	134-132-057	South Santa Rosa	2-7	Yes
SAN-2	298 W Robles Avenue	134-111-068	South Santa Rosa	2-7	Yes
SAN-3	3569 Brooks Avenue	134-132-056	South Santa Rosa	2-7	Yes
SAN-4	3345 Santa Rosa Avenue	043-153-021	South Santa Rosa	2-7	Yes
SAN-5	3509 Brooks Avenue	134-132-034	South Santa Rosa	2-7	Yes
SAN-6	3824 Dutton Avenue	134-072-040	South Santa Rosa	2-7	Yes
SAN-7	3280 Dutton Avenue	134-072-038	South Santa Rosa	2-7	Yes
SAN-8	3427 Moorland Avenue	134-111-020	South Santa Rosa	2-7	Yes
SAN-9	150 Todd Road	134-171-059	South Santa Rosa	2-7	Yes
SAN-10	4020 Santa Rosa Avenue	134-192-016	South Santa Rosa	2-7	Yes
SAN-11	3372 Santa Rosa Avenue	044-101-023	Santa Rosa	2-7	No
SAN-12	358 E Robles Avenue	134-132-022	Santa Rosa	2-7	No
SAN-13	3847 Santa Rosa Avenue	134-181-046	Santa Rosa	2-7	No
SAN-14	3847 Santa Rosa Avenue	134-181-047	Santa Rosa	2-7	No
SAN-15	3454 Santa Rosa Avenue	134-132-017	Santa Rosa	2-7	No
SAN-16	3445 Brooks Avenue	134-132-067	Santa Rosa	2-7	No
SAN-17	388 E Robles Avenue	134-132-025	Santa Rosa	2-7	No
GLE-1	950 & 987 Carquinez Avenue 136651 & 13675 Arnold Drive	054-290-057	Glen Ellen	2-8	Yes
GLE-2	No Address	054-290-084	Glen Ellen	2-8	Yes
AGU-1	188 Academy Lane	056-531-005	Agua Caliente	2-9	Yes
AGU-2	211 Old Maple Avenue	056-531-006	Agua Caliente	2-9	Yes
AGU-3	18621 Railroad Avenue	052-272-011	Agua Caliente	2-9	Yes
AGU-4	17881 Riverside Drive	133-150-038	Agua Caliente	2-9	No
PEN-1	10078 Main Street	047-174-009	Penngrove	2-10	Yes
PEN-2	No Address	047-152-020	Penngrove	2-10	Yes
PEN-3	10070 Main Street	047-174-008	Penngrove	2-10	Yes
PEN-4	No Address	047-152-019	Penngrove	2-10	Yes
PEN-5	361 Woodward Avenue	047-173-011	Penngrove	2-10	Yes
PEN-6	355 Adobe Road	047-091-013	Penngrove	2-10	Yes
PEN-7	220 Hatchery Road	047-153-004	Penngrove	2-10	Yes
PEN-8	206 & 11790 Main Street	047-166-023	Penngrove	2-10	Yes
PEN-9	11830 Main Street	047-166-025	Penngrove	2-10	Yes
PEN-10	10004 Main Street	047-173-016	Penngrove	2-10	No
PEN-11	5500 Old Redwood Highway	047-213-009	Penngrove	2-10	No
PEN-12	Old Redwood Highway	047-213-010	Penngrove	2-10	No
PET-1	1085 Bodega Avenue	019-090-003	Petaluma	2-11	Yes
PET-2	1105 Bodega Avenue	019-090-053	Petaluma	2-11	Yes
PET-3	1155 Bodega Avenue	019-090-004	Petaluma	2-11	Yes

Site ID	Site Address	Assessor's Parcel Number	Nearest Community	Corresponding Figure No.	Rezone Site?
PET-4	1002 Bodega Avenue	019-090-058	Petaluma	2-11	Yes
SON-1	20549 Broadway	128-311-015	Sonoma	2-12	Yes
SON-2	20561 & 20531 Broadway	128-311-016	Sonoma	2-12	Yes
SON-3	20535 & 20539 Broadway	128-311-014	Sonoma	2-12	Yes
SON-4	20563 Broadway	128-311-017	Sonoma	2-12	Yes
ELD-1	15577 Brookview Dr	054-381-010	Eldridge	2-13	No

2.6.4 Zoning and General Plan Amendments

The Sonoma County Housing Element Update would rezone up to 59 urban sites in General Plan-designated Urban Service Areas throughout unincorporated Sonoma County (as identified in Table 2-2) for by-right, medium-density housing. By-right, medium-density housing means that no discretionary land use approvals and no CEQA review would be required for the development of medium-density (up to 24 units per acre) housing on the sites. Design review approval is required for all multi-family or mixed-use housing development of more than three units. The proposed project would also identify appropriate sites on which to place the WH Combining District, which would allow for the development of jobs and/or housing on the same site or within walking distance from one another. The WH Combining District is an overlay added to sites with non-residential base zoning to allow for housing to be built on sites containing or adjacent to jobs.

Due to the proposed zoning modifications, a General Plan Map Amendment would be required to change the land use designations on those sites to maintain General Plan-zoning consistency. Where applicable, certain area plan amendments (to the South Santa Rosa Area Plan, Penngrove Area Plan, and West Petaluma Area Plan) would also be required to change land uses and densities on identified sites. In addition, potential rezoning of sites may be required to match new General Plan land uses or densities, and/or to add the WH Combining District.

Figure 2-2 Countywide Inventory Sites

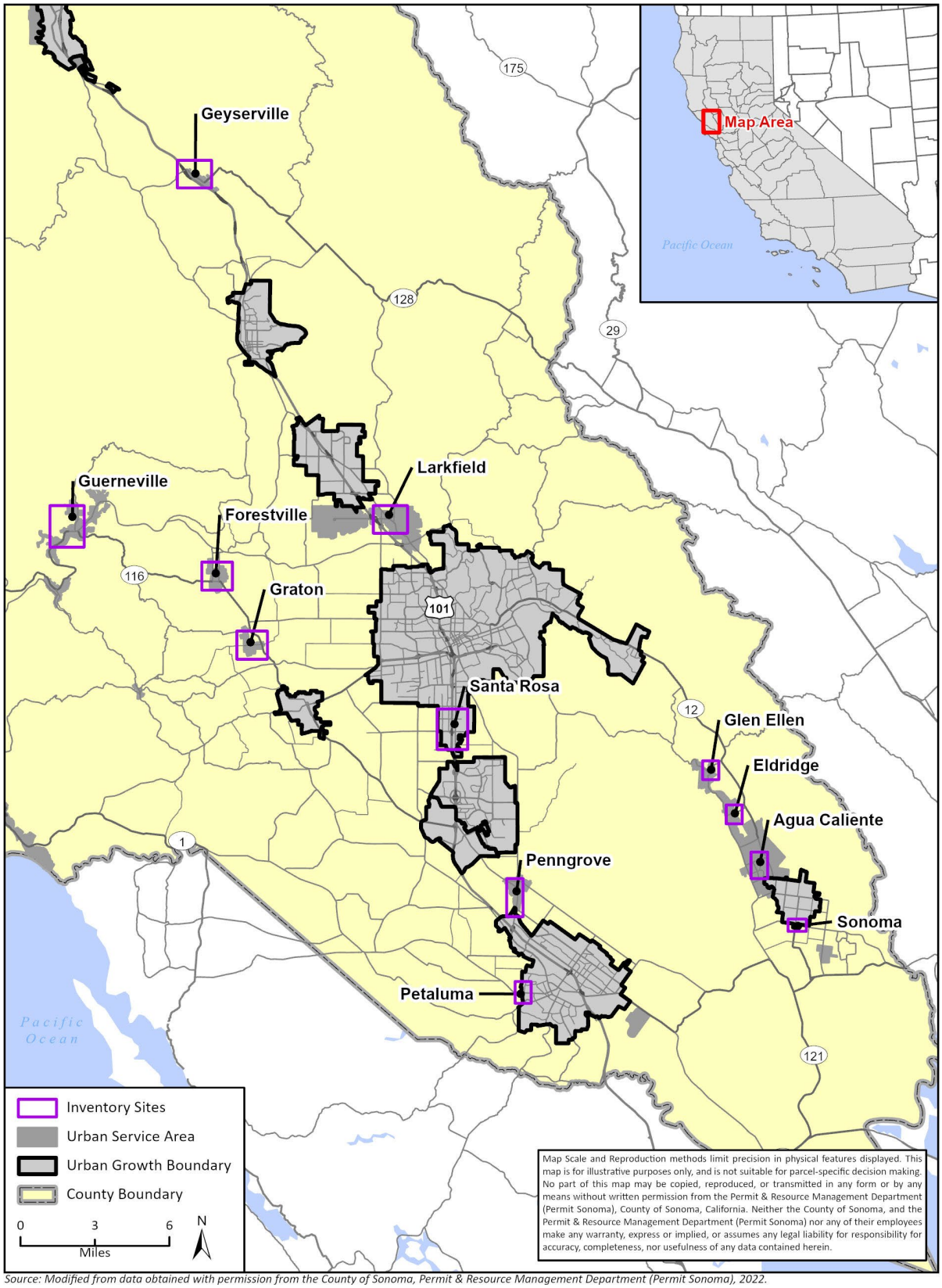


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Figure 2-3 Geyserville Inventory Sites

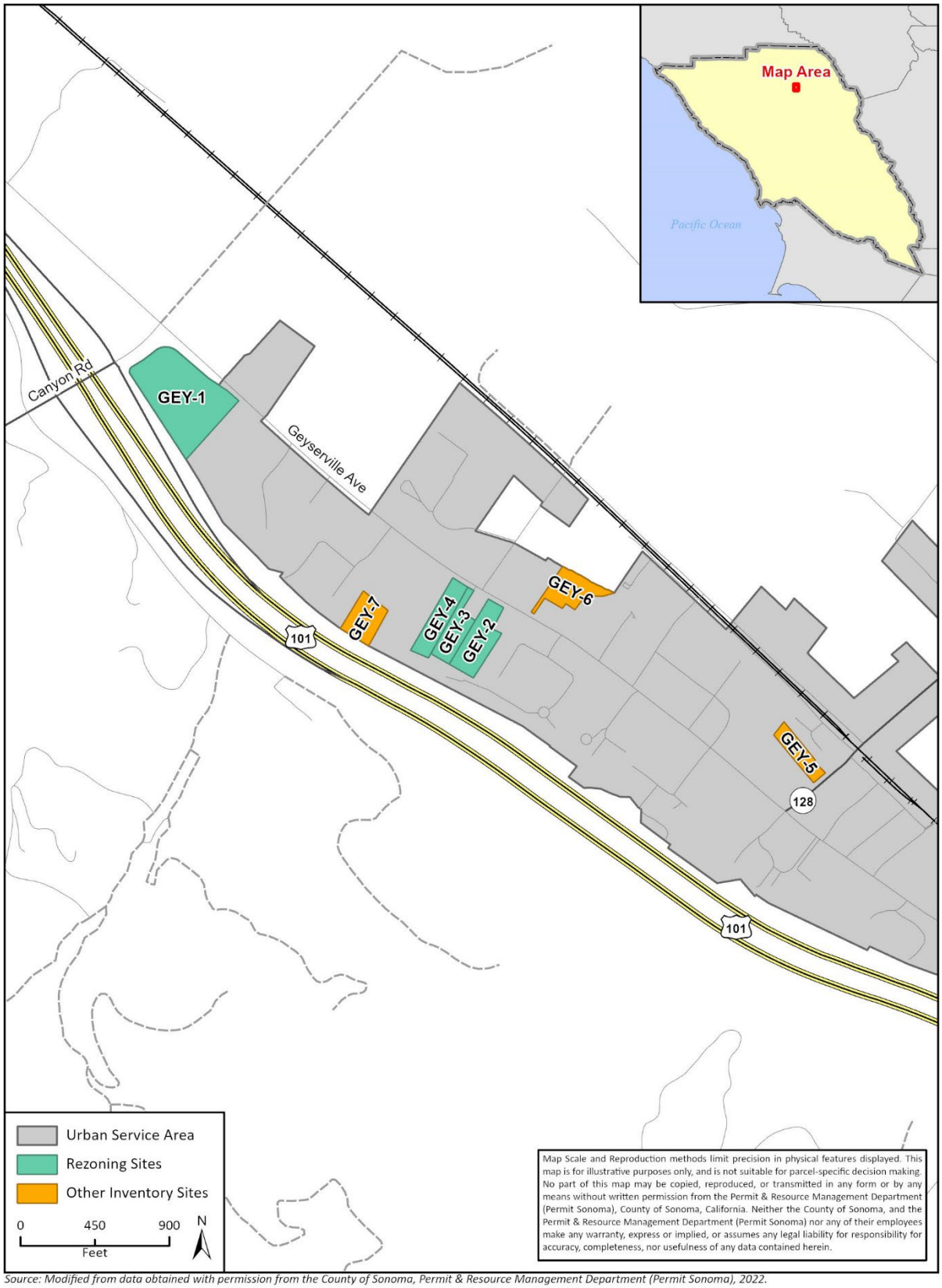

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Figure 2-4 Guerneville Inventory Sites

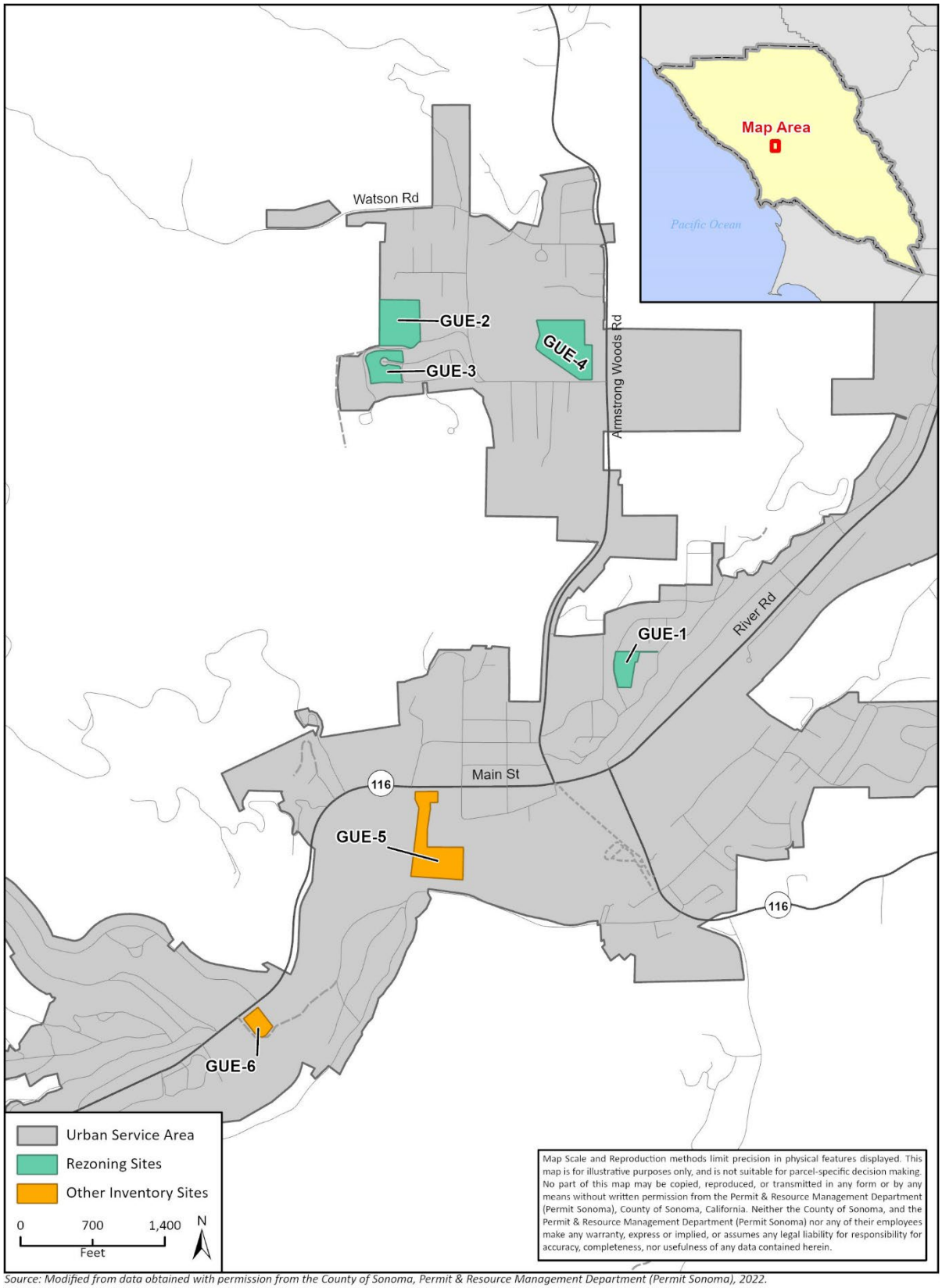

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Figure 2-5 Larkfield Inventory Sites

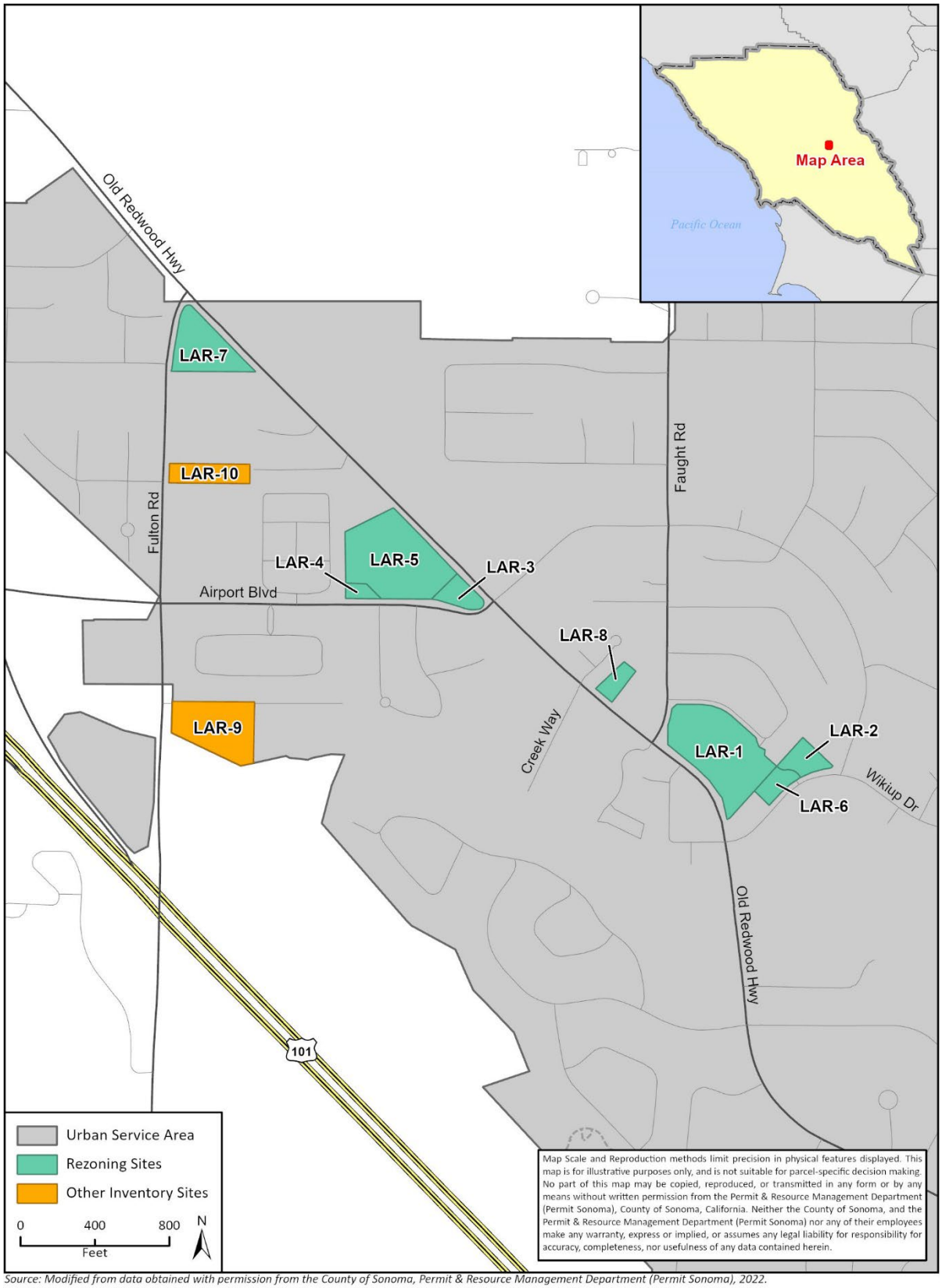

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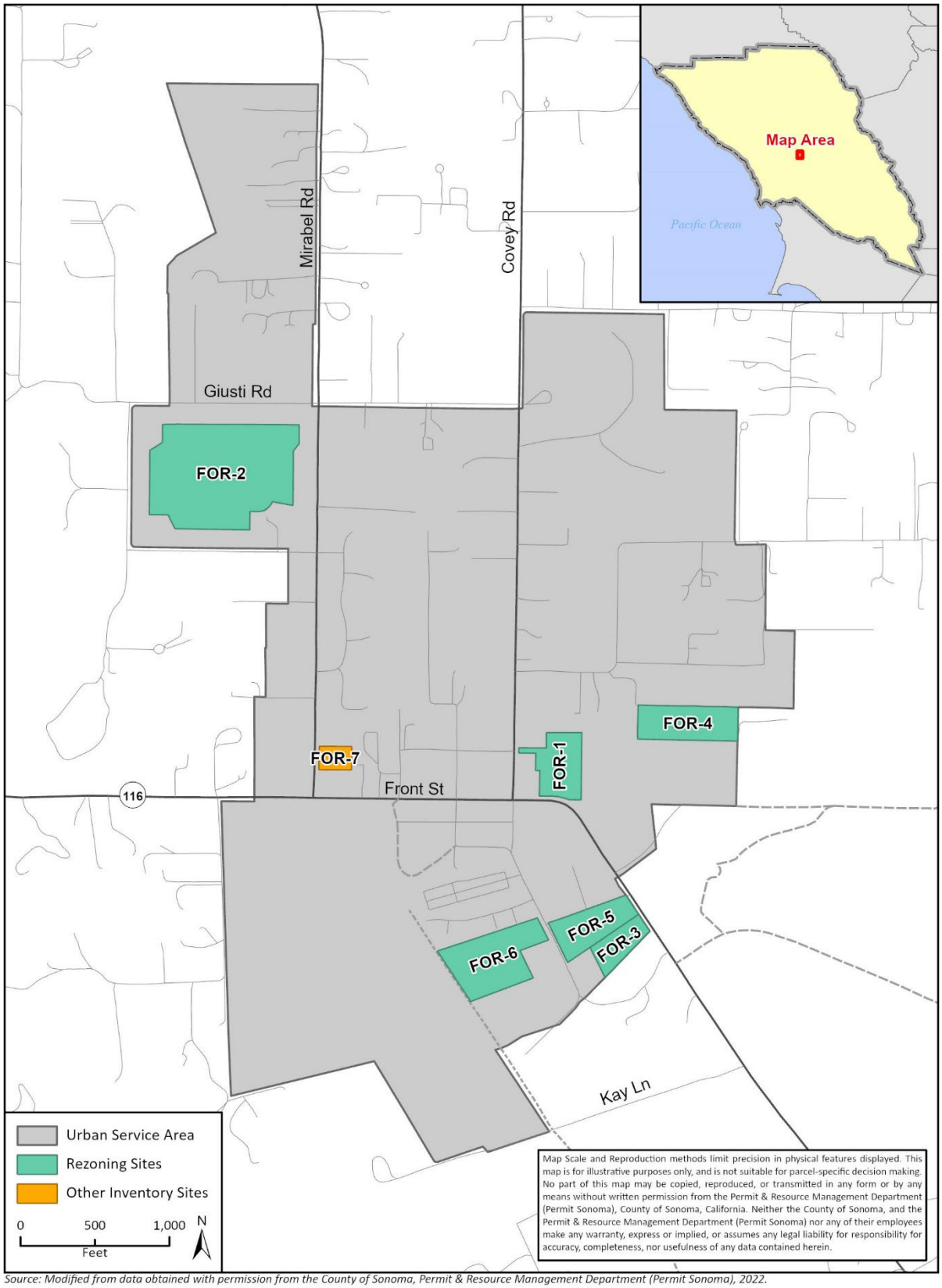
Figure 2-6 Forestville Inventory Sites



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Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri.

Figure 2-7 Graton Inventory Sites

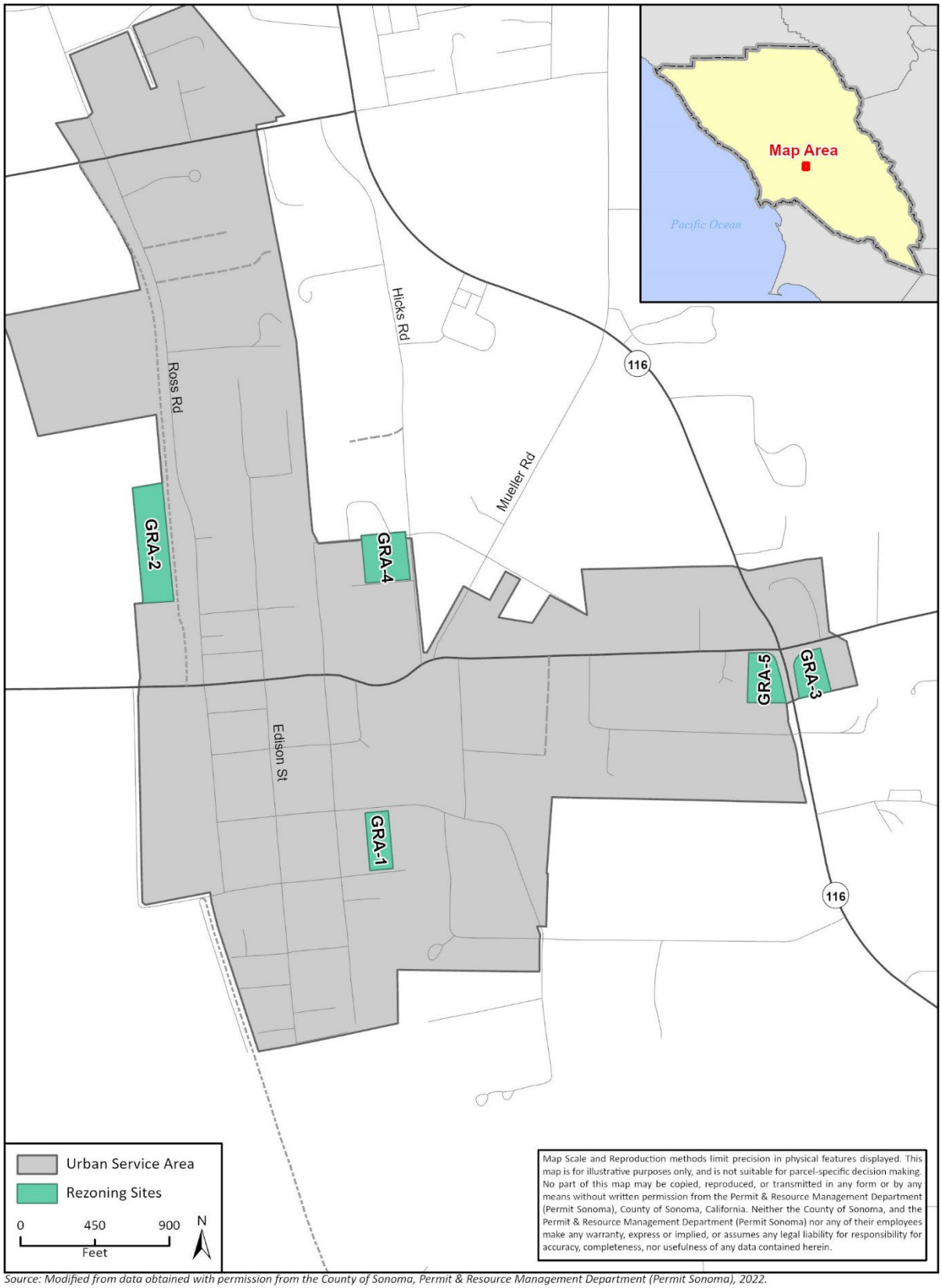

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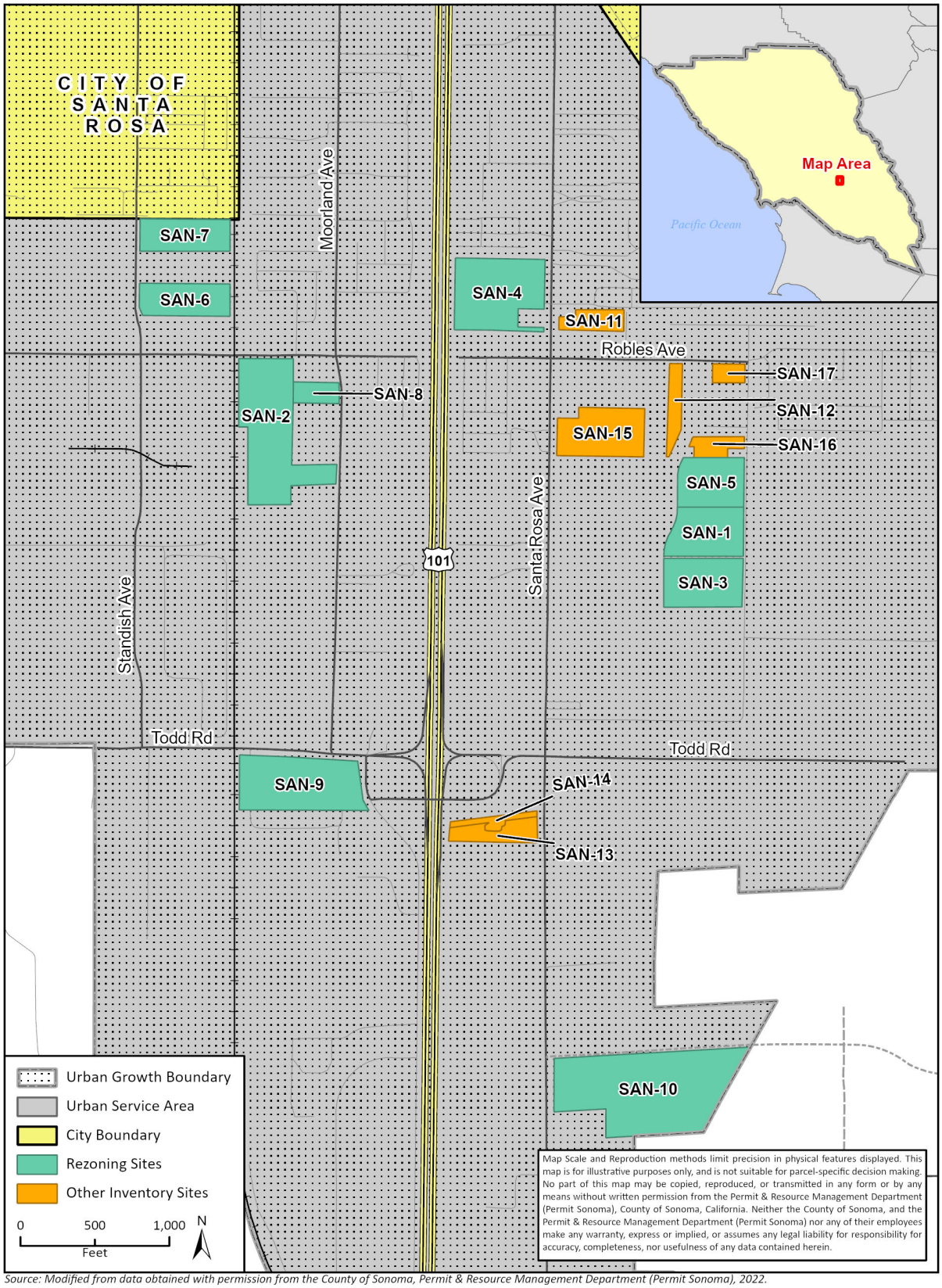
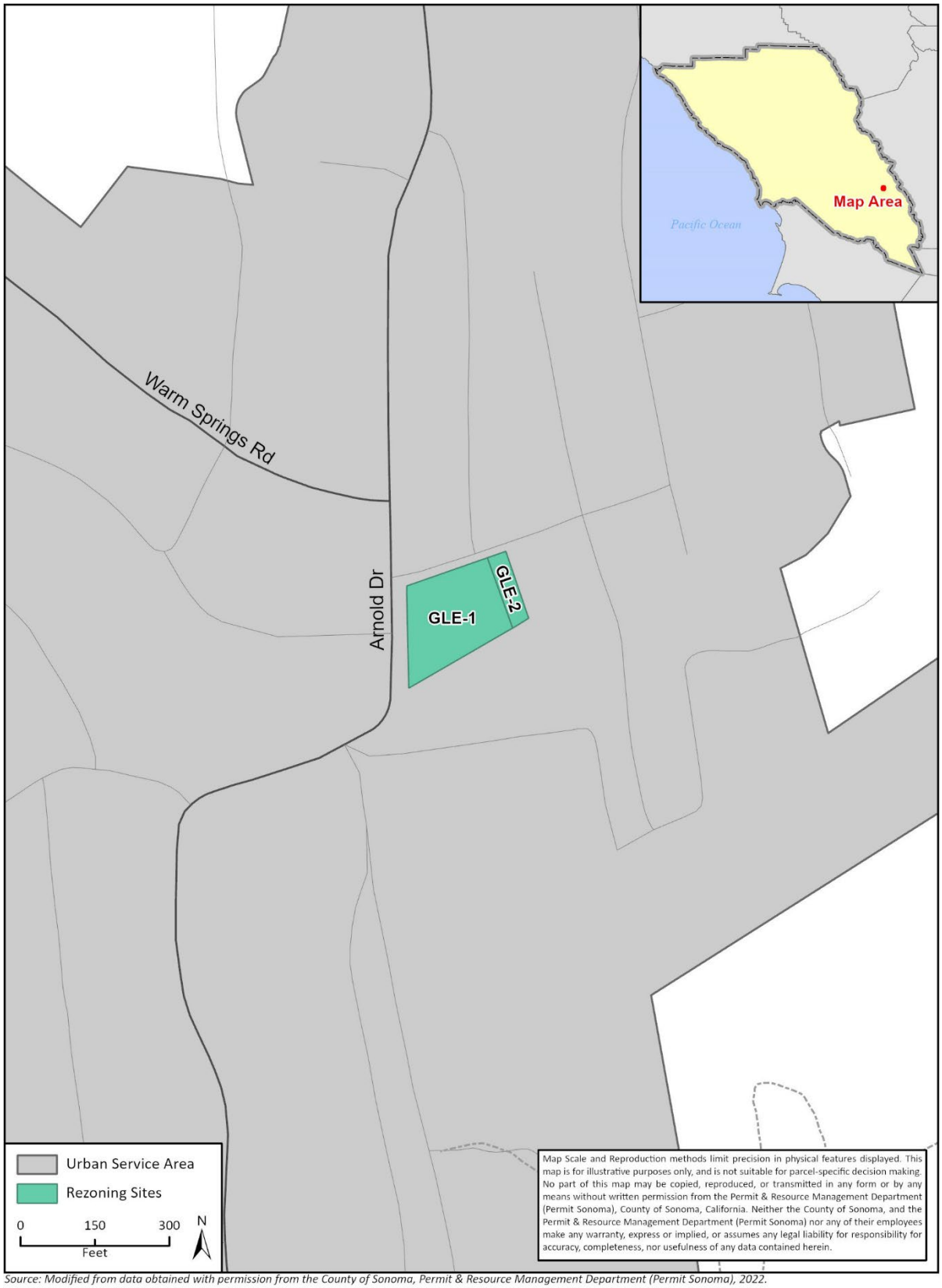
Figure 2-8 Santa Rosa Inventory Sites



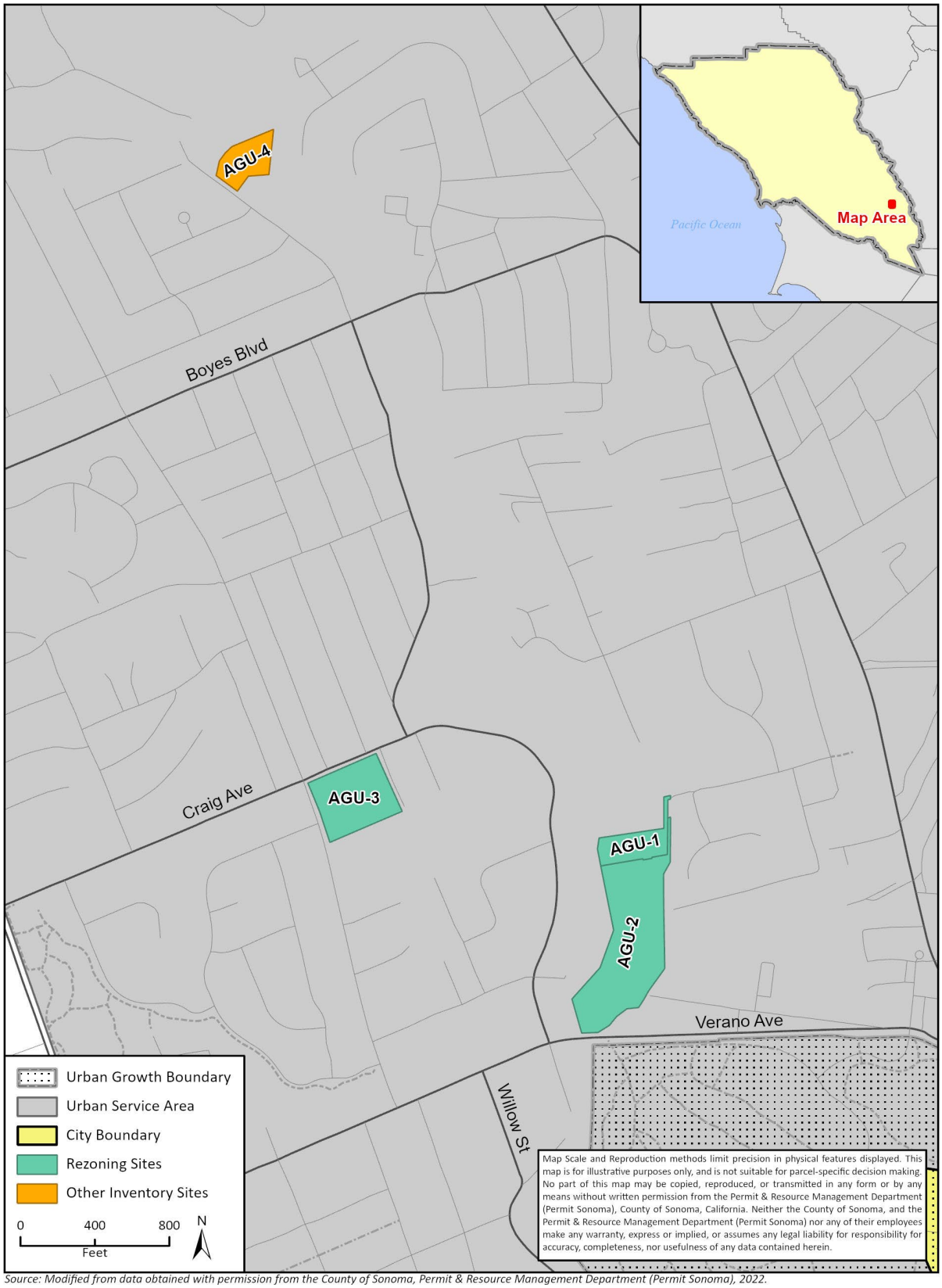
Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma), 2022.
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri.

Figure 2-9 Glen Ellen Inventory Sites



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma), 2022.
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri.

Figure 2-10 Agua Caliente Inventory Sites



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma), 2022.
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Figure 2-11 Penngrove Inventory Sites

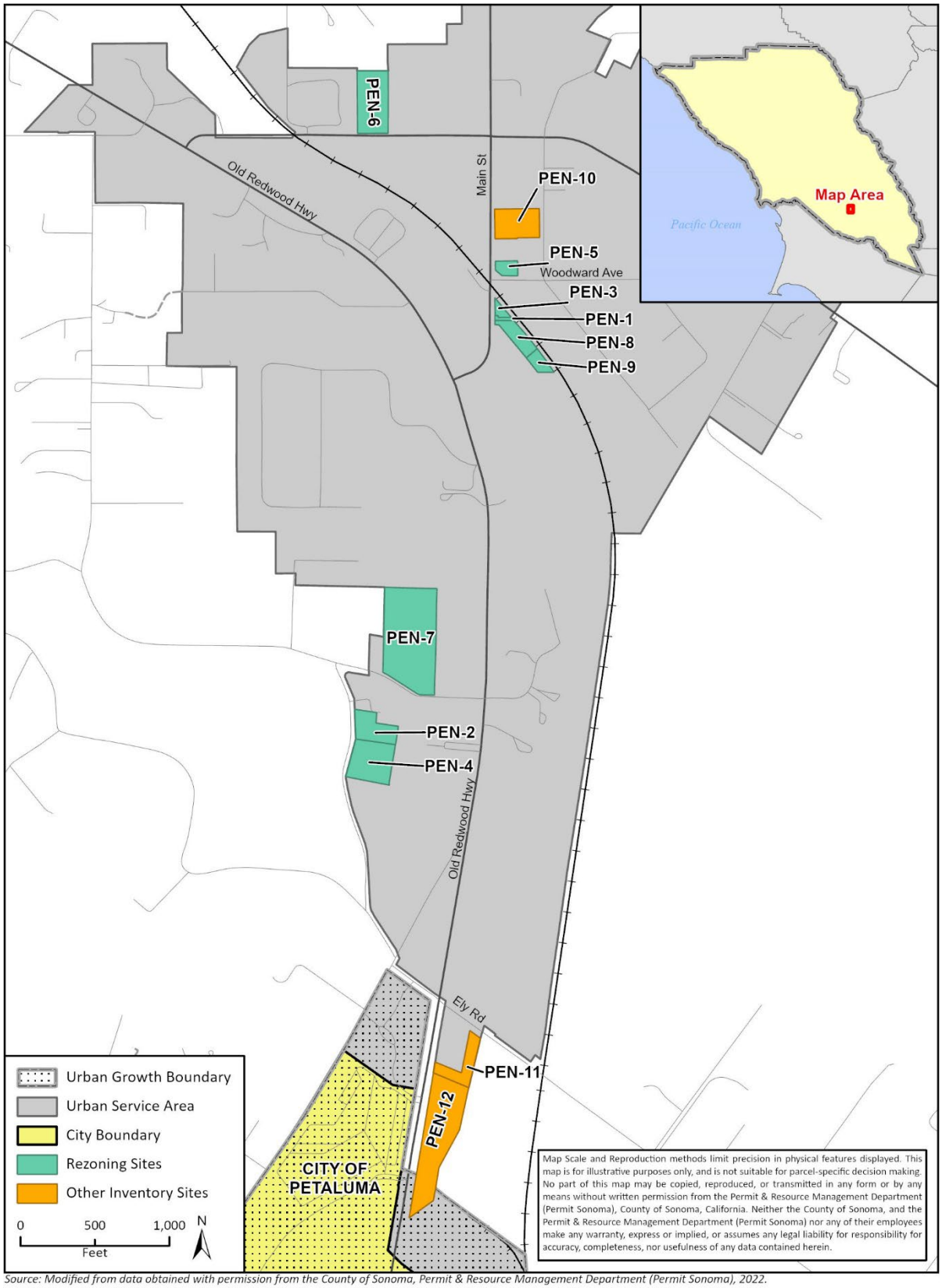

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Figure 2-12 Petaluma Inventory Sites

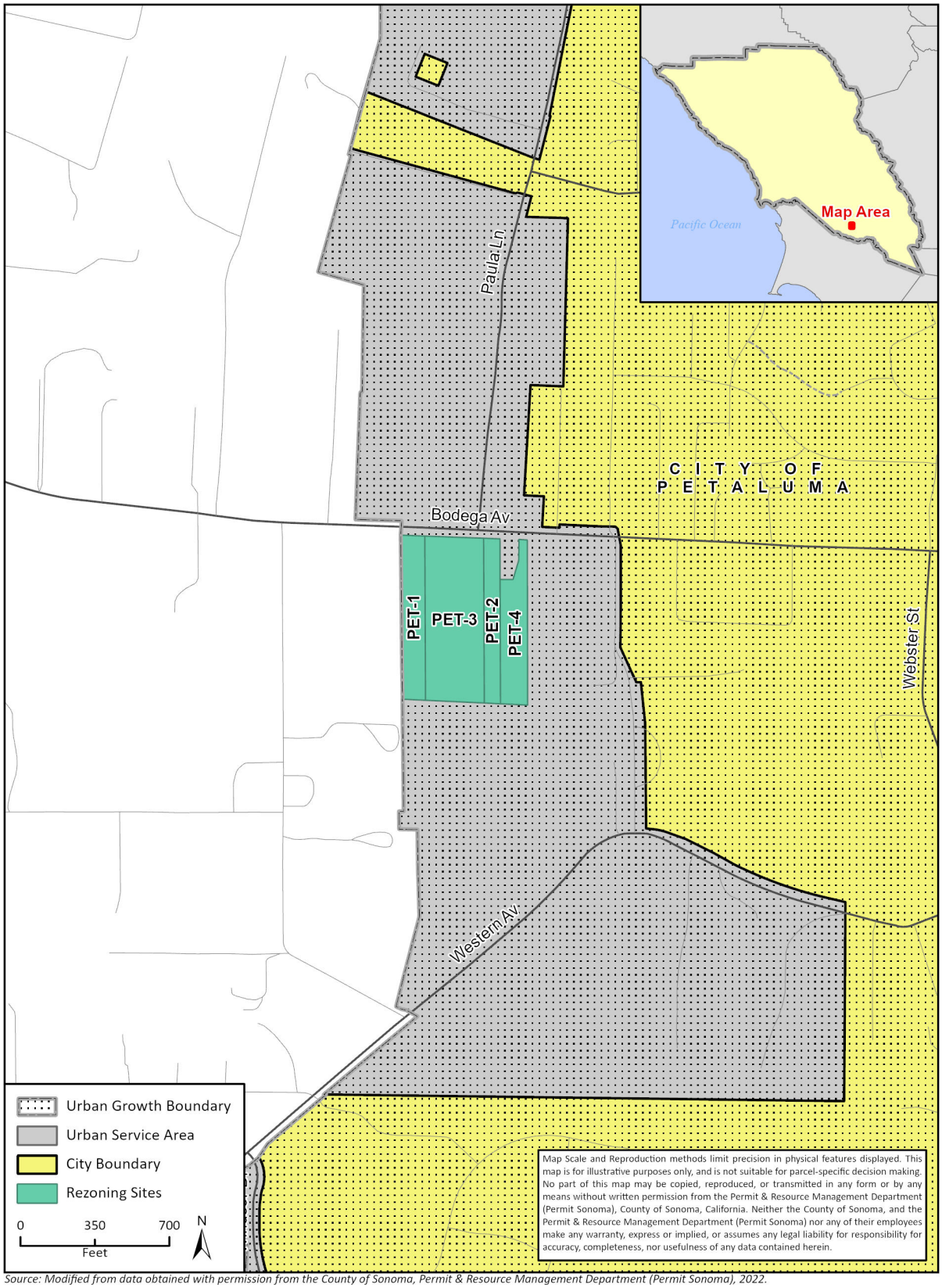

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Figure 2-13 Sonoma Inventory Sites

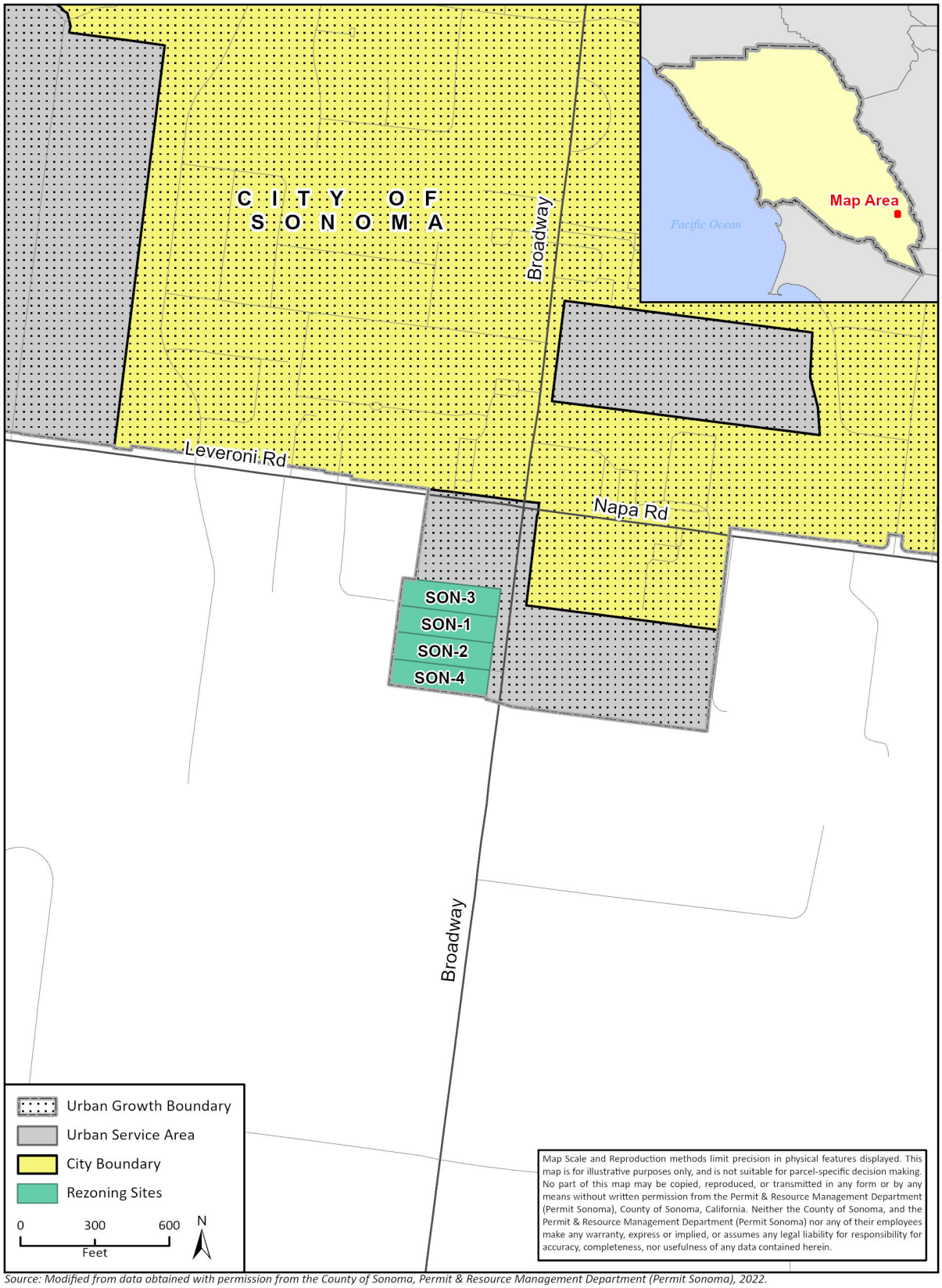

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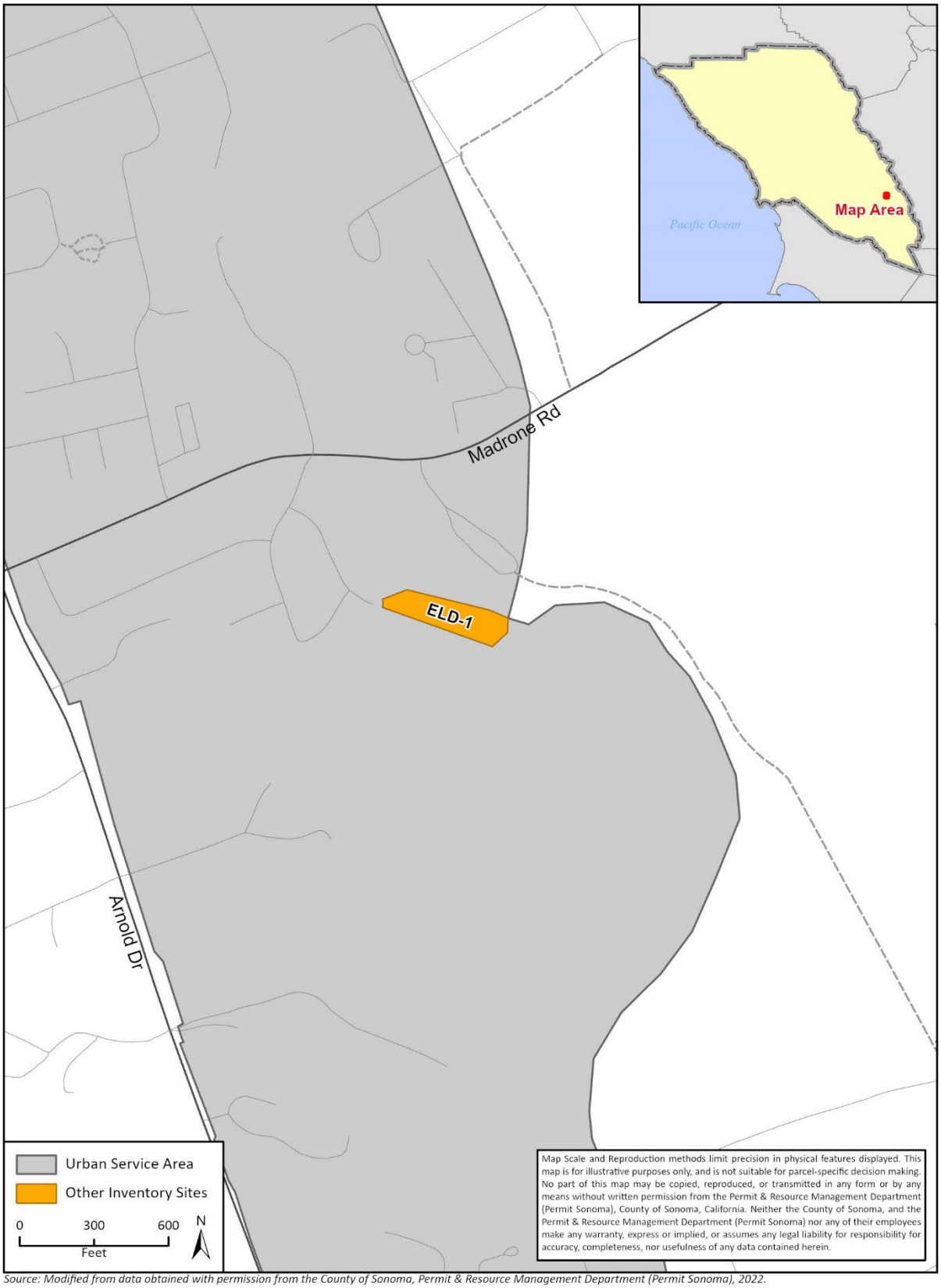
Figure 2-14 Eldridge Inventory Sites



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2.6.5 Project Buildout

Project implementation would incorporate up to 79 sites in the 6th cycle Housing Element site inventory and would encourage more efficient utilization of up to 59 urban sites throughout unincorporated Sonoma County, as listed in Table 2-2. The project is intended to facilitate and encourage housing development that could be developed over an eight-year period, commencing in 2023 and ending in 2031.

For purposes of the environmental analysis, sites analyzed for rezoning to R2, with a base density of 10 or 11 units per acre, were assumed to be rezoned to allow a density of 20 or 22 units per acre, respectively, which represents the maximum buildout potential utilizing the County's Rental Housing Opportunity Area program, which automatically doubles the site density for projects proposing to include at least 40 percent of units as affordable. Sites analyzed for rezoning to add the WH Combining District were assumed to allow a density of 24 units per acre, the maximum allowed in this district. Table 2-3 provides the proposed modified land use designation, residential density, zoning district, and maximum number of dwelling units allowed for each Rezoning Site. For purposes of this analysis, it is assumed that no density bonus program would be used on sites with WH Combining District, due to practical limitations of development in the County (few sites in the County to date have been developed at any density greater than 26 units per acre) and it would be speculative to assume a density bonus program would be used. The maximum density bonus available for projects approved under the WH Combining District is the 50 percent allowed under State Density Bonus Law (Government Code Section 65915). Overall, the analysis is programmatic and cumulative in nature that assumes that no more than 2,975 units would be developed throughout the 59 Rezoning Sites even if some sites used a density bonus.

Table 2-3 Proposed Land Use Designations and Zoning Districts for Rezoning Sites

Site(s)	Proposed Modification to General Plan Land Use Designation and Density[1] (units/acre)	Proposed New Base Zoning Districts and/or Addition of WH Combining District	Maximum number of dwelling units allowed per acre[2]
GEY-1	UR 10	R2	20
GEY-2	UR 10	R2	20
GEY-3	UR 10	R2	20
GEY-4	UR 10	R2	20
GUE-1	UR 10	R2	20
GUE-2	UR 10	R2	20
GUE-3	UR 10	R2	20
GUE-4	UR 10	R2	20
LAR-1	UR 11	R2	22
LAR-2	UR 11	R2	22
LAR-3	UR 11	R2	22
LAR-4	UR 11	R2	22
LAR-5	UR 11	R2	22
LAR-6	UR 11	R2	22
LAR-7	UR 11	R2	22
LAR-8	No change	Add WH	24
FOR-1	No change	Add WH	24

Site(s)	Proposed Modification to General Plan Land Use Designation and Density[1] (units/acre)	Proposed New Base Zoning Districts and/or Addition of WH Combining District	Maximum number of dwelling units allowed per acre[2]
FOR-2	UR 10	R2	20
FOR-3	UR 10	R2	20
FOR-4	UR 10	R2	20
FOR-5	UR 10	R2	20
FOR-6	UR 10	R2	20
GRA-1	UR 10	R2	20
GRA-2	No change	Add WH	24
GRA-3	UR 10	R2	20
GRA-4	UR 10	R2	20
GRA-5	UR 10	R2	20
SAN-1	UR 10	R2	20
SAN-2	No change	Add WH	24
SAN-3	UR 10	R2	20
SAN-4	LC	LC, Add WH	24
SAN-5	UR 10	R2	20
SAN-6	No change	Add WH	24
SAN-7	No change	Add WH	24
SAN-8	UR 10	R2	20
SAN-9	No change	Add WH	24
SAN-10	No change	Add WH	24
GLE-1	No change	Add WH	24
GLE-2	No change	Add WH	24
AGU-1	UR 10	R2	20
AGU-2	UR 10	R2	20
AGU-3	UR 10	R2	20
PEN-1	LC	Add WH	24
PEN-2	UR 10	R2	20
PEN-3	LC	Add WH	24
PEN-4	UR 10	R2	20
PEN-5	No change	Add WH	24
PEN-6	UR 10	R2	20
PEN-7	UR 10	R2	20
PEN-8	No change	C2, Add WH	24
PEN-9	No change	C2, Add WH	24
PET-1	UR 10	R2	20
PET-2	UR 10	R2	20
PET-3	No change	Add WH	24
PET-4	UR 10	R2	20
SON-1	UR 10	R2	20

Site(s)	Proposed Modification to General Plan Land Use Designation and Density[1] (units/acre)	Proposed New Base Zoning Districts and/or Addition of WH Combining District	Maximum number of dwelling units allowed per acre[2]
SON-2	UR 10	R2	20
SON-3	UR 10	R2	20
SON-4	UR 10	R2	20

[1] Commercial land use designations do not have associated residential density.

[2] The Rental Housing Opportunity Area Program doubles site density for projects with 40 percent affordable units..

General Plan Land Use Designations: UR = Urban Residential, LC = Limited Commercial

Zoning Districts: R2 = Medium Density Residential District, WH = Workforce Housing Combining District

Table 2-4 provides a comparison of the existing potential number of dwelling units and population buildout potential of the 59 Rezoning Sites, the proposed dwelling unit and population buildout potential, and the overall change in the buildout population that would result from the project. Table 2-5 identifies the dwelling unit and population buildout potential of the 20 additional inventory sites that would not be rezoned under implementation of the project. If all 59 sites are chosen to move forward in the Housing Element Update as studied under this EIR, project implementation could increase the housing availability in the County to accommodate up to 3,312 additional dwelling units and approximately 8,246 additional people.[3] The remaining 569 dwelling units required in the County under the 6th cycle RHNA would be accommodated by currently planned and approved units in development, in addition to the number of accessory dwelling units expected to be built in the County through 2031. For the purposes of this EIR, accessory dwelling units are exempt under CEQA and are consistent with the General Plan and zoning as provided in state law, including density.

Table 2-4 Housing Unit and Population Buildout Potential for Rezoning Sites

Rezoning Site	Total Allowable Dwelling Units Under Current Designation	Total Allowable Dwelling Units Under Proposed Designation	Change in Total Allowable Dwelling Units (Buildout Potential)	Total Population Under Current Designation[1]	Total Population Under Proposed Designation[1]	Change in Buildout Population Potential
GEY-1	82	123	41	213	320	107
GEY-2	8	33	25	21	86	65
GEY-3	5	22	17	13	57	44
GEY-4	6	26	20	16	68	52
GUE-1	6	30	24	16	78	62
GUE-2	2	80	78	5	208	203
GUE-3	8	41	33	21	107	86
GUE-4	3	105	102	8	273	265
LAR-1	1	97	96	3	252	250
LAR-2	0	16	16	0	42	42
LAR-3	10	14	4	26	36	10

[3] Calculation based on 2.6 persons per household in unincorporated Sonoma County (California Department of Finance 2022). See Table 4.14-2 in Section 4.14, *Population and Housing*, for more detail.

Rezoning Site	Total Allowable Dwelling Units Under Current Designation	Total Allowable Dwelling Units Under Proposed Designation	Change in Total Allowable Dwelling Units (Buildout Potential)	Total Population Under Current Designation[1]	Total Population Under Proposed Designation[1]	Change in Buildout Population Potential
LAR-4	4	6	2	10	16	5
LAR-5	72	99	27	187	257	70
LAR-6	0	12	12	0	31	31
LAR-7	10	45	35	26	117	91
LAR-8	0	11	11	0	29	29
FOR-1	46	70	24	120	182	62
FOR-2	7	283	276	18	736	718
FOR-3	3	33	30	8	86	78
FOR-4	2	71	69	5	185	179
FOR-5	6	58	52	16	151	135
FOR-6	0	120	120	0	312	312
GRA-1	6	23	17	16	60	44
GRA-2	0	71	71	0	185	185
GRA-3	1	22	21	3	57	55
GRA-4	1	36	35	3	94	91
GRA-5	1	27	26	3	70	68
SAN-1	1	74	73	3	192	190
SAN-2	0	200	200	0	520	520
SAN-3	1	80	79	3	208	205
SAN-4	1	149	148	3	387	385
SAN-5	1	67	66	3	174	172
SAN-6	0	73	73	0	190	190
SAN-7	0	72	72	0	187	187
SAN-8	1	20	19	3	52	49
SAN-9	0	159	159	0	413	413
SAN-10	3	128	125	8	333	325
GLE-1	1	19	18	3	49	47
GLE-2	1	3	2	3	8	5
AGU-1	1	27	26	3	70	68
AGU-2	7	132	125	18	343	325
AGU-3	16	64	48	42	166	125
PEN-1	0	1	1	0	3	3
PEN-2	1	21	20	3	55	52
PEN-3	0	4	4	0	10	10
PEN-4	2	35	33	5	91	86
PEN-5	1	8	7	3	21	18
PEN-6	2	40	38	5	104	99

Rezoning Site	Total Allowable Dwelling Units Under Current Designation	Total Allowable Dwelling Units Under Proposed Designation	Change in Total Allowable Dwelling Units (Buildout Potential)	Total Population Under Current Designation[1]	Total Population Under Proposed Designation[1]	Change in Buildout Population Potential
PEN-7	18	107	89	47	278	231
PEN-8	0	16	16	0	42	42
PEN-9	0	8	8	0	21	21
PET-1	1	39	38	3	101	99
PET-2	1	27	26	3	70	68
PET-3	1	65	64	3	169	166
PET-4	1	39	38	3	101	99
SON-1	0	19	19	0	49	49
SON-2	0	20	20	0	52	52
SON-3	1	20	19	3	52	49
SON-4	1	19	18	3	49	47
Total	**354**	**3,329**	**2,975**	**920**	**8,655**	**7,735**

Note: Numbers may not add due to rounding.

[1] Population based on 2.6 persons per household in unincorporated Sonoma County (California Department of Finance 2022). For example, for site GEY-1, 41 units buildout potential multiplied by 2.6 persons per unit = 107 persons (rounded).

Table 2-5 Housing Unit and Population Buildout Potential for Other Inventory Sites

Other Inventory Site	Total Allowable Dwelling Units	Total Population Potential (Based on Maximum Capacity)
GEY-5	12	10
GEY-6	12	17
GEY-7	9	10
GUE-5	10	20
GUE-6	10	11
LAR-9	22	66
LAR-10	10	10
FOR-7	10	8
SAN-11	26	32
SAN-12	40	44
SAN-13	10	15
SAN-14	10	7
SAN-15	26	106
SAN-16	40	38
SAN-17	40	30
AGU-4	10	13
PEN-10	12	16
PEN-11	10	10
PEN-12	10	38

Other Inventory Site	Total Allowable Dwelling Units	Total Population Potential (Based on Maximum Capacity)
ELD-1	8	10
Total	**337**	**511**

Physical changes resulting from project implementation may include development of Rezoning Sites with higher-density housing. This could take the form of more land coverage or taller buildings than currently allowed. Under the proposed project, this increased density would only occur within Urban Service Areas in the County.

2.7 Project Objectives

The Housing Element Update includes the following goals and objectives:

1. Meet the State required RHNA for 6th Cycle Housing Element planning period of 2023-2031
2. Bring the General Plan into conformance with recently enacted State housing law
3. Identify housing policies and programs that enable the development of additional units and the preservation of existing units, that reduce governmental constraints to building housing, and that affirmatively further fair housing
4. Identify housing sites with a collective capacity to meet the County's RHNA, with buffer capacity
5. Encourage the development of by-right higher-density housing in the County, increasing the overall availability of housing
6. Provide housing development opportunities throughout the urban areas of the Unincorporated County near jobs, transit, services, and schools
7. Implement existing goals, objectives, and policies of the Sonoma County General Plan that focus growth in established Urban Service Areas and encourage the development of infill sites to prevent sprawl and protect agricultural land and open space

2.8 Required Approvals

The Housing Element Update is subject to review and certification by the State Department of Housing and Community Development, and also requires the following approvals by the County of Sonoma as lead agency under CEQA. The Board of Supervisors would make the following approval actions:

1. Certification of the Housing Element EIR, pursuant to CEQA;
2. Adoption of a resolution amending the General Plan to adopt the updated Housing Element
3. Adoption of one or more resolutions amending the General Plan land use designations and/or South Santa Rosa Area Plan, Penngrove Area Plan, and West Petaluma Area Plan plans to reflect the zoning ordinance amendments
4. Adoption of one or more resolutions amending the General Plan policies and/or actions
5. Adoption of one or more ordinances amending the zoning code (Sonoma County Code, Chapter 26) and zoning database for consistency with the updated Housing Element and to reflect the location and density of the land uses permitted by the Housing Element

3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

3.1 Regional Setting

The Sonoma County Housing Element Update would apply to all unincorporated areas of Sonoma County. Sonoma County is located on the northern coast of California, surrounded by Mendocino County to the north, Napa County to the east, and Marin County to the south. Sonoma County is regionally accessible via Highway 101, which crosses the County from north to south. The 59 Rezoning Sites to be rezoned as part of the proposed project are located in urban service areas near Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, and Sonoma. Figure 2-1 in Section 2, *Project Description*, provides an overview of all Rezoning Site locations, and Figures 2-2 through 2-12 show the specific parcels in each area in the County.

Rezoning Sites near Geyserville, Larkfield, Santa Rosa, Penngrove, and Petaluma are regionally accessible from Highway 101; sites near Guerneville, Forestville, and Graton are regionally accessible from State Route 116; and Rezoning Sites near Glen Ellen, Agua Caliente, and Sonoma are regionally accessible from State Route 12.

The Mediterranean climate of the region and its coastal influence produce moderate temperatures year-round, with rainfall concentrated in the winter months. Air quality in the Bay Area Air Quality Management District (southern half of Sonoma County) is in nonattainment for $PM_{2.5}$ and ozone, and air quality in the Northern Sonoma Air Quality Management District (northern half of Sonoma County) is in attainment for all air pollutants.

3.2 Rezoning Sites Setting

As shown in Figures 2-2 through 2-14 in Section 2, *Project Description,* the 59 Rezoning Sites are located throughout Sonoma County in urban service areas. These sites are designated for agricultural, residential, commercial, and industrial uses; and are surrounded by residential development, agricultural land, public utilities infrastructure, commercial development, open space/undeveloped land, religious institutions, educational facilities, and light industrial and warehouse uses. The Rezoning Sites include both undeveloped and developed parcels.

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4 Environmental Impact Analysis

This section discusses the possible environmental effects of the Sonoma County Housing Element Update for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. As defined by the *CEQA Guidelines* Section 15382A, a "significant effect"

> …means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The environmental impact analysis focuses on the 59 sites that would be rezoned following adoption of the Housing Element, as the other 20 Housing Inventory Sites would not undergo a change from their current zoning, and the buildout potential on them would not change. Additionally, the Housing Element includes adoption of a policy under SB 10 to allow an increase in the maximum density of development of some parcels. As detailed in Section 2.6, *Project Characteristics*, these sites would be located within census-designated urbanized areas and urban service areas that are zoned R1 and located outside of both the high and very high fire hazard severity zones. Under the policy detailed in the Housing Element and allowed by SB 10, parcels that meet these criteria would be allowed to build a maximum of X du if they are between 10,000 square feet and 20,000 square feet in size, and a maximum of X du if they are above 20,000 square feet in size. There are over 2,000 sites in unincorporated Sonoma County between 10,000 and 20,000 square feet in size that fit these criteria and 1,000 sites in unincorporated Sonoma County above 20,000 square feet in size that fit these criteria. The Housing Element also includes the adoption of Program 15d to modify current limitations on cottage housing developments and to revise the by-right allowance for cottage housing developments from three units to four units per parcel before a use permit is required.

While SB10 and Program 15d would facilitate residential development, that development would occur over an extended period and would depend on factors such as local economic conditions, market demand, and other financing considerations. For example, a future developer may choose to develop a site at a density lower than what is allowed, or a vacant lot could remain vacant for several years until a development is identified for that property. For these reasons, the EIR analysis does not include projects facilitated by the County's adoption of an SB 10 ordinance and Program 15d, since we cannot speculate as to the location and timing of development that could occur under SB 10 and Program 15d. Future development facilitated by SB10 and Program 15d would be analyzed for CEQA compliance on a project-level basis.

The assessment of each issue area begins with a discussion of the environmental and regulatory setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the "significance thresholds," which are those criteria adopted by the County and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately

listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

1. **Significant and Unavoidable**. An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per *CEQA Guidelines* Section 15093.
2. **Less than Significant with Mitigation Incorporated**. An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under *CEQA Guidelines* Section 15091.
3. **Less than Significant**. An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
4. **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact.

Cumulative Development

Because the project is a housing element update, cumulative impacts are treated somewhat differently than would be the case for a project-specific development. *CEQA Guidelines* Section 15130 provides the following direction relative to cumulative impact analysis and states that the following elements are necessary for an adequate discussion of environmental impacts:

> A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

By its definition, a housing element identifies the overall housing conditions and needs of a community without necessarily identifying specific projects or future development. CEQA analysis of cumulative impacts for a housing element is general in nature and considers cumulative development that could occur within the County to the extent it is reasonably foreseeable. When future development is unspecified and uncertain, the EIR is not required to include speculation about future environmental consequences of such development. (*Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1448-1450). Where it is too speculative as to determine what, if any, future projects will develop in accordance with the housing element, a detailed cumulative analysis would also be too speculative to provide a meaningful discussion (*City of Maywood v. Los Angeles Unified School District* (2012) 208 Cal.App.4th 362, 399). As a result, the

analysis of project impacts in this EIR also constitutes the cumulative analysis. For example, the transportation analysis considers the overall change in vehicle miles travelled (VMT) due to implementing several reasonably foreseeable development projects that would add to the Housing Element buildout. As such, the analysis in this EIR considers the cumulative impacts in the County from implementation of the Housing Element in its transportation analysis at the same time it considers the project level analysis because they are essentially one and the same. These cumulative VMT calculations are accounted for in the air quality, energy, greenhouse gas emissions, and noise analyses; therefore, these analyses would also be considered cumulative. Other impacts, such as geology and soils and cultural resources, are site specific and would not result in an overall cumulative impact from growth outside of the County.

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4.1 Aesthetics

This section evaluates the proposed project for potential impacts on aesthetics, including scenic vistas, scenic resources, visual character and quality, and light and glare. Sites are grouped by nearest community in unincorporated Sonoma County.

4.1.1 Setting

Methodology

Evaluating visual impacts can be relatively subjective, but for CEQA analysis, aesthetic impacts are assessed by using methodologies that identify and describe the visual resources, determining the level of quality from public viewing locations, and estimating the level of effect changes to those views would produce. State and federal organizations have developed visual assessment guidelines for various contexts that often provide a basis for the development of local guidelines and standards.[1] Sonoma County published its Visual Assessment Guidelines to provide specific steps and criteria for evaluating aesthetic impacts of development throughout the County (County of Sonoma 2019). In brief, the procedure involves determining public viewing points and describing the existing setting for each site, reviewing photographs of the site to understand potential impacts, characterizing the site's sensitivity following the matrix offered in Table 4.1-1, and determining the potential visual dominance of the proposed project based on criteria described in Table 4.1-4. Based on this evaluation, a potential impact is determined. Where the County's guidelines do not specifically define criteria for aspects such as overall visual unity, intactness, or vividness, described below, the Federal Highway Administration and U.S. Forest Service guidelines are applied to enhance the discussion.

As addressed in this analysis, aesthetics refers to visual impacts to the environment, both natural and built, and includes adverse changes that reduce visual quality along with potential increases in glare or light in a project area. Aesthetics or visual resource analysis assesses the visible change and anticipated viewer response to that change.

This approach is suitable for use in this program-level analysis but can also be applied to specific projects when they are proposed for any of the Rezoning Sites. The proposed project does not implement specific development projects, but rather would rezone the Rezoning Sites so that they can be developed with multi-family residential projects. Because no specific development is proposed, this analysis focuses on a "program-level" evaluation that considers what visual impacts might be if development did ensue on a given site, and if it were to fulfill maximum potential size and density. Thus, sensitivity and dominance as they relate to potential visual impacts are estimated conservatively to present maximum case scenarios for each site.

Site Sensitivity

The visual sensitivity on the Rezoning Sites is rated based on the County's criteria that generally characterizes a site relative to its aesthetic value to the surrounding community (County of Sonoma 2019). This determination, then, considers both the site itself and the setting in which the site occurs. Criteria used to determine site sensitivity is presented in Table 4.1-1.

[1] See for example Bureau of Land Management (1984), Federal Highway Administration (2015), and U.S. Forest Service (1996).

Table 4.1-1 Site Sensitivity Criteria

Site Sensitivity Level	Summary of Site Criteria
Maximum	1. Designated scenic resource, corridor or landscape unit, or community separator 2. Natural setting, scenic backdrop 3. Visible from designated scenic corridor because of slope or situation on a ridgeline
High	1. Designated scenic resource, corridor or landscape unit, or community separator 2. Natural setting, scenic backdrop 3. Visible from scenic corridor, public roads, or other public use areas (parks, trails, etc.) because of slope or situation on a ridgeline
Moderate	1. Rural land use designation or urban designation that is not low sensitivity, but which has no scenic resource designation 2. May be near a gateway or include historic resources 3. Visible because of slope (less than 30 percent) or where significant aesthetic features are visible from public roads or public uses areas (parks, trails, etc.)
Low	1. In an urban land use designation with no scenic resource zoning protections 2. Vicinity is characterized by urban development or the site is surrounded by urban zoning designations a. No historic character b. Not a gateway to a community 3. Slope less than 20 percent and not on a prominent ridgeline 4. No significant natural vegetation of aesthetic value to surrounding community

Source: County of Sonoma 2019

Describing the visual character of a site includes details about the natural and human-built landscape features that contribute to the visual character of an area or view. From that data, the sensitivity rating for a project site can be described, along with the surrounding environment on which the project, when implemented, may have an impact. Aspects considered include geology, water features, plants, wildlife, trails and parks, and architecture and transportation elements (e.g., bridges or city skylines). The way visual character is perceived can vary based on the season, the time of day, the light, and other elements that influence what is visible in a landscape. The basic components used to describe visual character are form, line, color, and texture of landscape features and the level of light and glare under existing conditions (County of Sonoma 2019).

Along with the site sensitivity, the visual quality is assessed to rate that sensitivity. Visual quality is a term that indicates the uniqueness or desirability of a visual resource, within a frame of reference that accounts for the uniqueness and "apparent concern for appearance" by concerned viewers (e.g., residents, visitors, jurisdictions) (U.S. Forest Service 1996). A well-established approach to visual analysis is used to evaluate visual quality, using the concepts of vividness, intactness, and unity (Federal Highway Administration 2015), defined as follows:

1. Vividness describes the memorability of landscape components as they combine in striking patterns.
2. Intactness refers to the visual integrity of the natural and human-built environment.
3. Unity indicates the visual coherence and compositional harmony of the landscape as a whole.

Photographs are used to understand the elements that make up visual character and quality and are provided as both points of reference and data sources that support these evaluations. Because the project does not propose to implement development, only to rezone the Rezoning Sites for

residential land use, simulations or conceptualizations are not produced in this analysis. Rather, the photographs are used to understand the context in which development could occur when the sites are rezoned, and to estimate the associated impact based on potential visual dominance from public roadways or other public viewing areas, if the sites are built out to the maximum allowable density and height.

Visual Dominance

After the site sensitivity is determined, visual dominance is determined based on how prominent a project would be when developed. Again, because the project does not propose specific development, this analysis assesses the potential dominance if maximum height and density are built and if most or all existing vegetation is removed. The development dominance criteria are based on the County guidelines, as follows:

1. Dominant: project elements stand out, contrast with the existing landscape (built and natural)
2. Co-Dominant: project elements attract attention equally with other features and are compatible with surroundings
3. Subordinate: project elements can be seen but do not attract attention, repeat forms, colors, textures of surroundings
4. Inevident: project not visible from public view due to intervening natural landforms or vegetation

Impact Determination

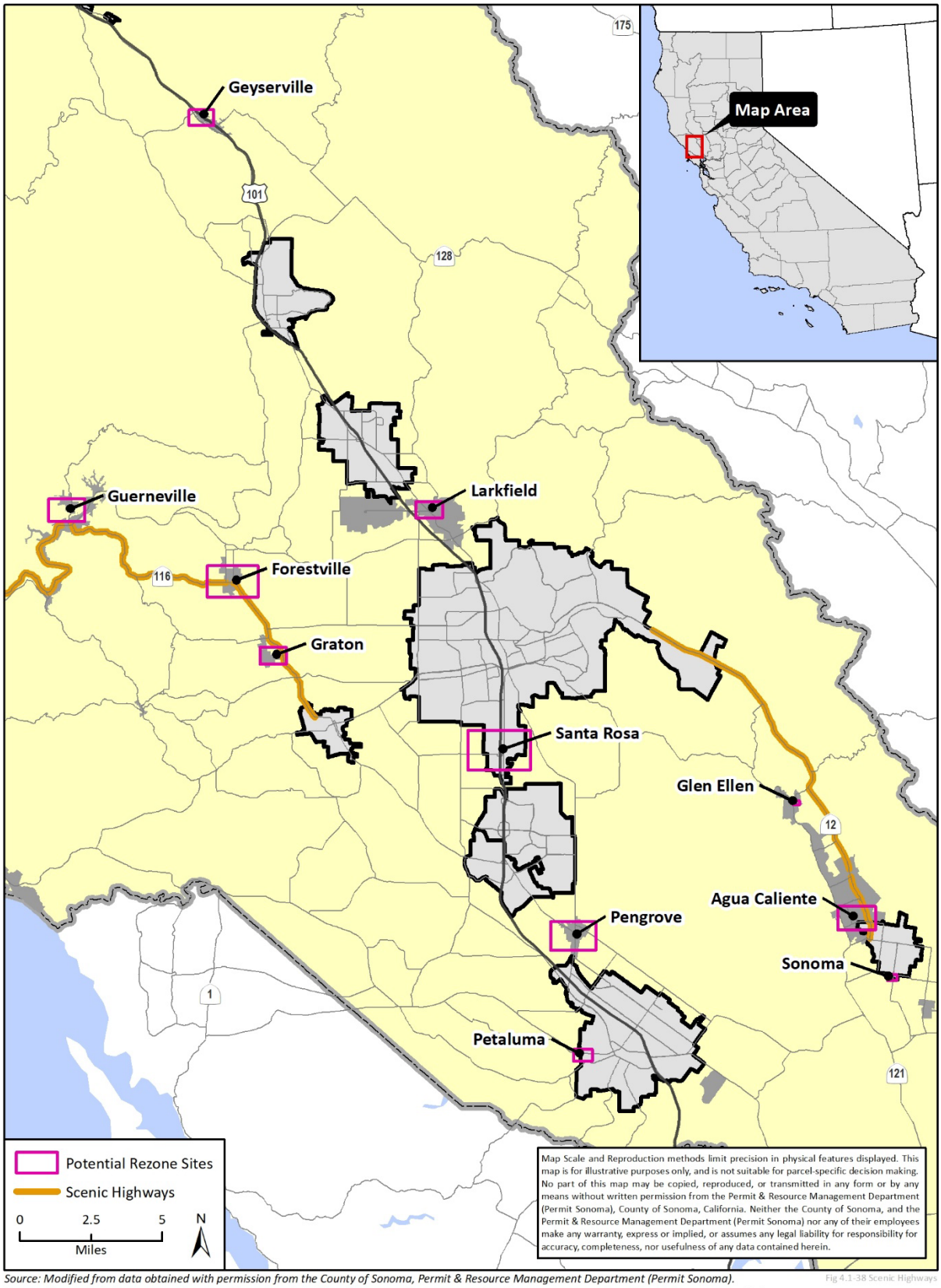
Finally, the visual impact significance is determined by combining the sensitivity with the visual dominance evaluations such that higher levels of sensitivity and dominance combine to create significant impacts and lesser ones to create less than significant impacts. Once the impact is determined, the County Guidelines offer measures designed to reduce impacts through design, landscaping, materials, screening, and limiting lighting. These are applied to potential impacts by sites where impacts could be significant.

CEQA analysis was conducted using knowledge of thresholds that meet the CEQA Guidelines and industry standards for the assessment of visual impacts. These criteria were then framed within the County's Visual Assessment Guidelines language/format; while the language is somewhat different, the process is ostensibly the same as are the conclusions.

4.1.2 Scenic Zoning

Many roadways throughout Sonoma County offer views of scenic areas. The General Plan designates an extensive network of scenic corridors and highways that are protected by development standards. Two roadways are officially designated as part of the State Scenic Highway system: State Route 116 from State Route 1 through Guerneville to the Sebastopol city limit, and State Route 12 from Danielli Avenue east of Santa Rosa to London Way near Agua Caliente (Caltrans 2019). Table 4.1-2 indicates the approximate distance of the Rezoning Sites that occur near one of these scenic highways. Other County roadways designated as scenic corridors and potentially near the proposed project include Arnold Drive (GLE-1, GLE-2, AGU-1, AGU-2, and AGU-3) Petaluma Hill Road (PEN-5, -1, -3, -8), Bodega Avenue (PET-1, PET-2, PET-3, and PET-4), Armstrong Woods Road, and Highway 101 north of Windsor. Figure 4.1-1 shows the designated scenic highways and indicates their proximity to the Rezoning Sites.

Figure 4.1-1 Designated Scenic Highways in Sonoma County



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri.

Fig 4.1-38 Scenic Highways

Table 4.1-2 Rezoning Sites Near Designated Scenic Highways

Rezoning Site	Nearby Designated Scenic Highway	Approximate Distance
GUE-1	State Route 116	0.6 mile
GUE-4	State Route 116	1.1 miles
FOR-1	State Route 116	adjacent
FOR-3	State Route 116	adjacent
FOR-5	State Route 116	adjacent
GRA-3	State Route 116	adjacent
GRA-5	State Route 116	adjacent
GLE-1	State Route 12	0.1 mile
GLE-2	State Route 12	0.1 mile
AGU-1	State Route 12	0.3 mile
AGU-2	State Route 12	0.3 mile
AGU-3	State Route 12	0.9 mile

The designations have the following intent:

1. **Scenic Resources Combining District (SR):** To preserve the visual character and scenic resources of lands in the County and to implement the provisions of Sections 2.1, 2.2, and 2.3 of the General Plan Open Space Element. SR zoning indicates that a site is located within a scenic corridor setback,[2] or within a scenic landscape unit[3] a community separator as designated in Figures OSRC-5a through OSRC-5i of the Sonoma County General Plan. Regulations for development in SR combining districts are contained in Article 64, Section 26-64-020 of the County Zoning Code.
2. **Local Guidelines Combining District (LG):** To identify parcels subject to compliance with Article 90 of the Zoning Code, which implements General Plan Land Use Element policies and programs that protect and enhance the unique character of specific unincorporated communities and area, while allowing for land uses and development authorized in the Land Use Element (Sonoma County Code, Section 26-90-010).
3. **Valley Oak Habitat Combining District (VOH)**: To protect and enhance valley oaks and valley oak woodlands and to implement the provisions of Section 5.1 of the General Plan Resource Conservation Element (Sonoma County Code, Section 26-67-005).

While the importance of valley oak woodlands to the environment in the County is discussed in Section 4.4, *Biological Resources*, trees and woodlands are also a distinctive part of the Sonoma County visual landscape and form an important visual resource, where they occur. They also help to soften the effects of urbanization and infill on areas with a more rural character prior to development. Therefore, VOH-zoned Rezoning Sites were described above, and are discussed later, in the impact analysis, in terms of how tree removal might affect the visual quality of the site. Table 4.1-2 lists Rezoning Sites near designated scenic highways, and Table 4.1-3 shows sites with zoning or general plan designations that protect visual resources.

[2] No Rezoning Sites are wholly within a scenic corridor; however, the following Rezoning Sites are adjacent to a Scenic Corridor: GEY-1 through GEY-4, GUE-4, FOR-1, FOR-3, FOR-5, GRA-3, GRA-5, SAN-4, GLE-1, PEN-1, PEN-3, PEN-5, and PET-1 through PET-4.
[3] No Rezoning Sites are wholly within a scenic landscape unit; however, the following Rezoning Sites are adjacent to a Scenic Landscape Unit: GEY-1 through GEY-4, GUE-2, GUE-3, FOR-3, FOR-5, and GRA-1.

Table 4.1-3 Rezoning Sites with Zoning and General Plan Designations that Protect Visual Resources

Rezoning Site	Scenic Resource Combining District	Local Guidelines Combining District	Valley Oak Habitat
GEY-1	■		
GEY-4	■		
GUE-1		■	
GUE-2		■	■
GUE-3		■	■
GUE-4		■	■
LAR-1			■
LAR-2			■
LAR-3			■
LAR-4			■
LAR-5			■
LAR-6			■
LAR-7			■
LAR-8			■
FOR-1	■	■	
FOR-2		■	
FOR-3	■	■	
FOR-4		■	
FOR-5	■	■	
FOR-6		■	
GRA-3	■	■	
GRA-5	■	■	
SAN-1			■
SAN-2			■
SAN-3			■
SAN-4	■		■
SAN-5			■
SAN-6			■
SAN-7			■
SAN-8			■

Rezoning Site	Scenic Resource Combining District	Local Guidelines Combining District	Valley Oak Habitat
SAN-9			■
SAN-10			■
GLE-1	■		
GLE-2	■		
AGU-1			■
AGU-2			■
AGU-3			■
PEN-1			■
PEN-3	■		■
PEN-5	■		
PEN-8	■		■
PET-1	■		■
PET-2	■		■
PET-3	■		
PET-4	■		
SON-1	■		■
SON-2	■		■
SON-3	■		■
SON-4	■		■

4.1.3 Rezoning Sites Visual Assessment

The Sonoma County General Plan addresses aesthetic concerns in its Land Use Element. Therein, policies establish that the visual quality of the communities and open spaces throughout the County are tied to natural resources and that protection of these resources is important to the community, both from an economic perspective and in terms of its sense of place. As Sonoma County includes a wide range of landscapes, from agricultural valleys to forested hills and watery marsh lands, the visual character of each community with a Rezoning Sites is unique and is described below. Sites occur in areas near or in the communities of Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, and Sonoma. The following discussion describes each Rezoning Site and offers an assessment of the site sensitivity and estimated dominance of potential development. Table 4.1-4 offers a summary of these determinations.

Table 4.1-4 Rezoning Site Sensitivity and Dominance Ratings

Rezoning Site	Site Sensitivity	Project Potential Dominance
GEY-1	High	Dominant
GEY-2	Moderate	Co-Dominant
GEY-3	Moderate	Co-Dominant
GEY-4	Moderate	Co-Dominant
GUE-1	Moderate	Co-Dominant
GUE-2	Moderate	Co-Dominant
GUE-3	Moderate	Co-Dominant
GUE-4	Moderate	Dominant
LAR-1	Low	Co-Dominant
LAR-2	Low	Co-Dominant
LAR-3	Low	Co-Dominant
LAR-4	Low	Co-Dominant
LAR-5	Low	Co-Dominant
LAR-6	Low	Co-Dominant
LAR-7	Moderate	Dominant
LAR-8	Low	Co-Dominant
FOR-1	High	Dominant
FOR-2	Moderate	Dominant
FOR-3	High	Dominant
FOR-4	Moderate	Dominant
FOR-5	High	Dominant
FOR-6	High	Dominant
GRA-1	Low	Co-Dominant
GRA-2	Low	Co-Dominant
GRA-3	High	Co-Dominant
GRA-4	Moderate	Co-Dominant
GRA-5	High	Co-Dominant
SAN-1	Low	Subordinate
SAN-2	Low	Co-Dominant
SAN-3	Low	Co-Dominant
SAN-4	Low	Subordinate
SAN-5	Low	Dominant
SAN-6	Low	Co-Dominant
SAN-7	Low	Co-Dominant
SAN-8	Low	Co-Dominant
SAN-9	Low	Subordinate
SAN-10	Low	Co-Dominant
GLE-1	High	Dominant
GLE-2	High	Dominant

Rezoning Site	Site Sensitivity	Project Potential Dominance
AGU-1	Moderate	Co-Dominant
AGU-2	Moderate	Co-Dominant
AGU-3	Moderate	Co-Dominant
PEN-1	High	Co-Dominant
PEN-2	Moderate	Dominant
PEN-3	High	Co-Dominant
PEN-4	Moderate	Dominant
PEN-5	High	Co-Dominant
PEN-6	Moderate	Co-Dominant
PEN-7	Moderate	Dominant
PEN-8	High	Co-Dominant
PEN-9	High	Co-Dominant
PET-1	High	Dominant
PET-2	High	Dominant
PET-3	High	Dominant
PET-4	High	Dominant
SON-1	Moderate	Co-Dominant
SON-2	Moderate	Co-Dominant
SON-3	Moderate	Co-Dominant
SON-4	Moderate	Co-Dominant

Geyserville

Geyserville is in the Cloverdale/Northeast County Planning Area. The Mendocino Highlands on the west and the Mayacamas Mountains on the east form the scenic Russian River Valley, including the Dry Creek and Alexander valleys. The area is rich in natural resources and includes streams, riparian benchlands, geothermal steam sites, construction aggregates, and surface waters. Lands outside of the valley floors are wooded and largely void of urbanized features. The Geyserville area is characterized by expansive views of the Alexander Valley and the hills to the east and west. Much of this area is planted in vineyards and other agricultural uses. There are four Rezoning Sites in Geyserville.

From the first Rezoning Site in Geyserville (GEY-1), unobstructed views to the northeast feature the signature ridgeline in the background, small rural residences and barns in the middle ground, and agricultural fields throughout (Figure 4.1-2). The visual quality is high at this site because the landscape looking northeast features vivid, intact vistas looking east toward the Sonoma Mountains and foothills from Geyserville Avenue. Existing zoning includes the SR (Scenic Resources) Combining District on a portion of the site, because the site is adjacent to Highway 101, a County-designated Scenic Corridor. The view from Geyserville Avenue features rural residential development, including structures with limited massing and distinctive rustic style, mature trees near houses that screen them from the roadway. The site is zoned Limited Commercial (LC) and Affordable Housing (AH) Combining District, and because of the degree of open space with views to the hillsides, development on this site would be dominant depending on design, height, and density.

The town has one main road, Geyserville Avenue, off Highway 101 and connects to State Route 128. GEY-2, GEY-3, and GEY-4 are situated close to the northern town boundary, directly adjacent to each other just south of GEY-1. The long lots are developed with single-family residences that appear to have been constructed in the early twentieth century. They are landscaped with mature trees. Looking west from Geyserville Road, the ridgeline is visible in the near background (Figure 4.1-3). Adjacent uses include a school between GEY-1 and GEY-4, and other single-family homes east of GEY-2. GEY-4's existing zoning includes the SR Combining District on a portion of the site located in the designated setback from the Highway 101 Scenic Corridor. The site sensitivity at GEY-2, GEY-3, and GEY-4 is moderate as the parcels are not zoned in a way to protect scenic resources, but the neighborhood has a high degree of intactness and unity due to maintained landscaping and historic cottage-style homes, and views of the site are framed by the nearby hillside and have a high degree of vividness that defines the sense of place at this location. Current residential development on the sites is co-dominant, and potential development would be co-dominant.

Figure 4.1-2 GEY-1, Looking Northeast

Source: Google Earth 2020

Figure 4.1-3 GEY-2, GEY-3, and GEY-4, Looking Southeast from Geyserville Road

Source: Google Earth 2020

Guerneville

Guerneville is a small summer resort town. It includes the neighborhood of Rio Nido located about 1.3 miles to the east. The Russian River parallels State Route 116 through the town and provides an important scenic resource. Land uses in the urbanized area of Guerneville consist mainly of small, single-family residential subdivisions interspersed with recreational and visitor-serving commercial uses on both sides of River Road and State Route 116; local-serving commercial uses concentrated in the blocks leading up to and in the center of Guerneville; and single-family dwellings in Rio Nido and along and near Old Cazadero and Hidden Valley roads. Beyond the urbanized area, small pockets of rural residential development and agricultural and natural resource lands occur (County of Sonoma 2016). The County General Plan notes that the view corridor along State Route 116 contains unique views of orchards, redwood stands, and the Russian River and defines the boundary between Guerneville and other communities.

The Rezoning Sites in Guerneville are in three locations: GUE-1 is near the Russian River west of River Road; GUE-2 and GUE-3 are northwest of State Route 116; and GUE-4 is off Armstrong Woods Road. GUE-1 is elevated but trees screen the site from the River Road and the Russian River beyond (southeast). Site sensitivity is moderate and the zoning includes the LG/116 (Highway 116 Scenic Corridor) Combining District;[4] from River Road, the visual quality is low as roadwork, highway signage, and construction stockpiles are visible in the foreground, along with above-ground transmission lines disrupting any sense of intactness or visual unity. Despite the dense forestation in the middle ground (Figure 4.1-4), the views lack vividness looking west from the roadway, for the same reasons. Development on the site would be dominant if significant numbers of trees were removed.

GUE-2 and GUE-3 are on undeveloped lands among single-family residences bordered by agricultural lands and wooded hillsides (Figure 4.1-5). Nearby foothills are visible from the street through the undeveloped or sparsely developed adjacent lots. Site sensitivity is moderate and the zoning is LG/116 at both these sites; residential development and parked vehicles reduce the intactness of an otherwise vivid rural residential setting. The neighborhood has moderately high visual quality as residential development has unity in the varied architectural design and mature landscaping; the country lane style roadway has a degree of vividness that further contributes to the overall quality. Development in this area would likely be co-dominant with other residential development.

GUE-4 is a large, flat site situated among single-family residential uses on large lots off Armstrong Woods Road and Laughlin Road. On Armstrong Woods Road, the neighboring houses lack unity of design and landscaping. From Laughlin Road, the visual quality is higher, with more unity of design and landscaping, but the site itself is not visible due to congested vegetation that grows at the southern boundary. Looking northwest from Laughlin Road across the site, the ridgelines are moderately visible in the background (Figure 4.1-6). On the northern border, the Sonoma County Road Department operates a facility that includes industrial structures, a paved lot, and dirt stockpiles. The lot is fenced with chain-link. Visual quality varies and lacks vividness and overall unity, making site sensitivity moderate. Zoning is LG/116 and a portion of the site is zoned SR (Scenic Resources, Armstrong Woods Road Scenic Corridor). Viewer sensitivity would be moderately high for people traveling through the area to recreate on the Russian River, and development that

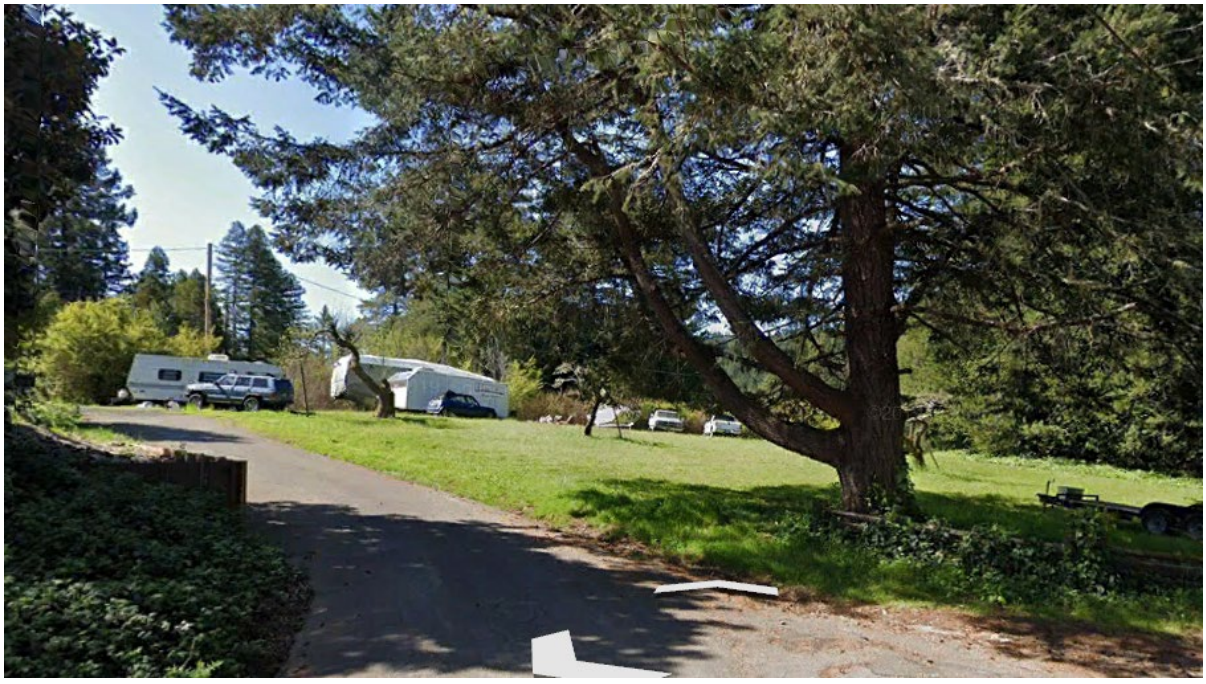
[4] LG zoning is a designation that works to protect and enhance the unique character of specific unincorporated communities and areas, as designated by the Board, while allowing for land uses and development authorized in the General Plan Land Use Element (Sonoma County Zoning Code Section 29-90-010). Character-defining features are considered part of site sensitivity determination for this analysis where parcels are thus zoned.

creates a strong contrast with the landscape or existing structures would be dominant, depending on design, height, and density.

Figure 4.1-4 Site GUE-1 from River Road, Looking West Past Construction Stockpile

Source: Google Earth 2020

Figure 4.1-5 GUE-2 and GUE-3 Looking Westward from Cutten Avenue



Source: Google Earth 2020

Figure 4.1-6 GUE-4 from Laughlin Road, Looking North

Source: Google Earth 2020

Larkfield-Wikiup

Larkfield-Wikiup is located approximately 5 miles north of Santa Rosa, west of Highway 101. Seven Rezoning Sites are in the Larkfield area. It features suburban residential development with limited commercial uses, in a valley surrounded by mountains, the ridgelines of which clearly demarcate the background. Most of the Rezoning Sites occur along Old Redwood Highway and are in developed areas with the VOH (Valley Oak Habitat) Combining District, making existing oak habitat important to the visual character.[5] These are discussed below from north to south.

LAR-7, the northernmost site, is a vacant lot bordered by mature trees (Figure 4.1-7). It is undeveloped except for a small pumphouse situated in the middle of the property. From Old Redwood Highway a vineyard is visible to the northeast, with the Sonoma Mountains in the background. Entering developed areas, a rustic-style commercial structure is across the roadway from LAR-7. Looking southwest from the roadway, the site and its immediate surroundings are characterized by residential development that includes single-family residences that appear to have been built in the early twentieth century. The lots are large and landscaped with mature trees and other vegetation. The older mobile home park on the east side of Old Redwood Highway is screened from the roadway by wooden fencing and dense landscaping near the boundary. The site has moderate sensitivity as adjacent vineyards and the early twentieth century homes give the area a unified rustic character with moderately high visual quality. New development would be dominant, depending on design, height, and density.

[5] VOH is protected under Section 26-67-005 of the County Zoning Code.

Figure 4.1-7 LAR-7 Looking Southwest on Old Redwood Highway

Source: Google Earth 2020

LAR-3 and LAR-5 are at the northwest corner of Old Redwood Highway and Airport Boulevard. They constitute a large, undeveloped area with residential and commercial uses nearby (Figure 4.1-8). These uses are less unified along this stretch of Old Redwood Highway, where there are a mix of single-family and multi-family developments. Landscaping creates a buffer, but the visual character is more urban and less unified, giving the sites a low sensitivity. The area has a moderate level of intactness as denser development encroaches on views beyond and the architecture is not distinctive enough to replace those views. The visual quality is further disrupted by industrial elements such as traffic signals and above-ground transmission lines, and new development would likely be co-dominant.

Figure 4.1-8 LAR-3 and LAR-5 Looking Southwest

Source: Google Earth 2020

LAR-4 is west of LAR-5 on Airport Boulevard and is undeveloped. A mobile home residential community is immediately west of the site, and light-industrial and commercial uses are across the street. Looking across the site from Airport Boulevard, the northeastern mountains are visible in the background (Figure 4.1-9). Like LAR-3 and LAR-5, the mix of urbanized development lacks visual unity and industrial features such as power lines disrupt the views, giving the site low sensitivity. New development would likely be co-dominant with surrounding land uses.

Figure 4.1-9 LAR-4 Looking North from Airport Boulevard

Source: Google Earth 2020

Further south on Old Redwood Highway, LAR-8 is a small site with adjacent single- and multi-family residential uses. The ridgeline is visible in the background looking through the site, but high-voltage powerlines intervene in the middle ground reducing the intactness of the view (Figure 4.1-10). As with the other sites in this area, the visual quality is moderate as the area lacks unity of design, giving LAR-8 a low site sensitivity. New development would likely be co-dominant.

LAR-1 is on the east side of Old Redwood Highway and is currently developed with a church and a school (Figure 4.1-11). Beyond the site, single-family homes are visible in the middle ground and the ridgeline can be seen in the background. Across Old Redwood Highway, a fence and mature trees shield a planned residential development and common open space area from the roadway. Graffiti on the fence is painted over and high-power transmission lines cross the neighborhood. This part of the roadway lacks unity of design and includes only intermittent longer-range views of the landscape, reducing the intactness and rendering the sense of place negligible and giving the site a low sensitivity rating. New development would likely be co-dominant with existing land uses.

The LAR-2 and LAR-6 sites are on Wikiup Drive, southeast of LAR-1 and next to a school and medical/office uses (Figure 4.1-12). The sites are undeveloped but feature mature trees and vegetation at their boundaries. The adjacent uses are multi-story and consistent with other commercial and office uses in the area, although the vividness is relatively low because of the industrial transportation components and above-ground transmission lines. The area has no distinctive architecture, and development is consistent with typical suburban infill of recent decades, giving the Rezoning Sites a low sensitivity. New development would likely be co-dominant with existing land uses.

Figure 4.1-10 LAR-8 with Ridgeline Visible in the Background

Source: Google Earth 2020

Figure 4.1-11 LAR-1 at the Corner of Faught Road and Old Redwood Highway

Source: Google Earth 2020

Figure 4.1-12 LAR-2 and LAR-6 Looking North from Wikiup Drive

Source: Google Earth 2020

Forestville

Forestville is in central Sonoma County, south of the Russian River. The scenic lowlands and floodplain around the Laguna de Santa Rosa include marsh, swamp, riparian forest, and the hills. State Route 116 defines the community boundary for Forestville, where it transitions into Front Street as it passes through the town core (County of Sonoma 2018). Views along State Route 116 include orchards, redwood groves, and the Russian River; the roadway is considered part of a scenic corridor and properties along the highway are generally zoned LG/116. The community itself features limited, single-family residential development with some commercial and light industrial such as mini-storage facilities. The small downtown area features shops, restaurants, a post office, and other community-serving businesses. Cultivated agricultural fields are adjacent to the community on each side.

Six Rezoning Sites are identified in Forestville. FOR-1 is a flat site near the northeast corner of Front Street and Covey Road, where State Route 116 enters the town and is designated as a scenic highway, zoned SR (Scenic Corridor) and LG/116, which protects unique community character (Figure 4.1-13). FOR-1 is bordered by residential development to the north and a restaurant to the west. A gateway sign appears at the property boundary, facing Front Street. Surrounding ridgelines are not visible from this point in the road. The site is developed with a residence and numerous outbuildings, although these are not clearly visible from the roadway. FOR-1 is surrounded by existing development, including several churches that appear to have been constructed during the early twentieth century and that are designed in a modified Mission-style or a rustic type of architecture. Similarly, residential development adheres to a cottage-style design with wooden, clapboard-style siding characteristic of rural development from the nineteenth century. Some more recently constructed residences in the immediate neighborhood also use this style. Intermixed with residential development, several commercial and restaurant uses that, while not distinctive in style, are unified with the general style of the residential development. Neutral colors, rustic facades, and murals contribute to the vividness of the immediate surroundings and give this site a high sensitivity. New development could be dominant, depending on design and situation on the site.

Figure 4.1-13 FOR-1 Looking Northeast from Front Street

Source: Google Earth 2020

FOR-2 is a large parcel west of Mirabel Road surrounded by single-family homes on large lots and zoned LG/116 but outside the SR designation. Views of the ridgelines and open spaces are not visible from the streets looking across the lot due to existing residential development, flat topography, and mature vegetation on all sides (Figure 4.1-14). On Giusti Road, residences are large, single-story, and designed in a vernacular suburban ranch style. They are situated close to the roadway and are landscape in a varied but unified manner. On Mirabel Road, a school is directly across the street from FOR-2. The residential development on Mirabel Road features a less unified design than that on Giusti Road, with fewer trees and some intermittent fencing. Residential development on both sides of Nolan Road is like that on Giusti Road, but with less unified design and landscaping. Overall, the area around the site exhibits visual unity as the homes are large and consistently feature mature landscaping. While the unity is high, the level of vividness is lower because the neighborhood does not offer expansive views or feature notable architecture. The site has moderate sensitivity and, depending on density and height, new development could be dominant.

FOR-4 is situated east of FOR-1 in an area accessible only by unpaved roads off Van Keppel Road. It is a large lot, bordered to the north by single-family homes, on the south by an undeveloped field behind the Forestville Elementary School, to the east by vacant and cultivated agricultural fields, and to the west by forested open space with single-family residential development beyond. The parcel has an LG/116 zoning designation. Numerous mature trees are on the site along with two single-family residences and associated structures. The site has moderate sensitivity and development could be dominant if it differs considerably from surrounding land uses.

FOR-5, FOR-3, and FOR-6 are undeveloped parcels with adjacent residential development and a nearby water treatment facility, mini-storage, and other older-appearing industrial structures, with cultivated agricultural fields to the northeast (Figure 4.1-15 and Figure 4.1-16). Views of ridgelines and other natural resources are mostly unavailable from these sites due to the flat topography and intervening development, but the views of vineyards from Gravenstein Highway make the visual quality observed from that roadway vivid and intact. These sites are also zoned LG/116, which protects community character. Portions of FOR-3 and FOR-5 are also zoned SR (Scenic Resources) Combining Zone, because they are adjacent to the Highway 116 Scenic Corridor. On Forestville Street, single-family residences are a mix of architectural styles that range from Mission to Ranch hybrids. Because these sites are adjacent to a scenic highway and within a scenic corridor, site sensitivity is high for all three of these Rezoning Sites and new development could be dominant, depending on density and orientation.

Figure 4.1-14 FOR-2 Near Mirabel Road with Mature Vegetation in the Left Foreground

Source: Google Earth 2020

Figure 4.1-15 FOR-5 from Forestville Street Looking Northeast

Source: Google Earth 2020

Figure 4.1-16 FOR-6 from Forestville Street Looking Southwest

Source: Google Earth 2020

Sonoma

Sonoma is an incorporated community in the southeastern portion of Sonoma County, nestled into the foothills of the Sonoma Mountains. Located in a famed part of Sonoma County's vineyard country, the city is known for its historic mission and plaza, its contribution to the regional viticulture, and its low-density mix of rural residential development. The mountain block to the north rises 1,200 feet and provides an important scenic backdrop around which the views of the city's original streetscape were designed.

The Rezoning Sites are on the southwestern edge of the city, within the City of Sonoma's designated Urban Growth Boundary and County-designated Urban Service Area, and all are zoned SR (because they are located along Broadway, a Scenic Corridor) VOH. The sites comprise adjacent lots on the west side of Broadway. They feature limited residential development on large parcels in the form of one or more single-family homes and associated structures, set back some distance from the street (Figure 4.1-17 and Figure 4.1-18). Except for SON-3, all the sites have some mature trees and paved access roadways and parking areas. Closest to Broadway, SON-1 features a large oak tree, with a canopy that shields the parcel from the street.

Southwest of the intersection of Broadway and Leveroni Road, SON-3 is adjacent to retail uses, including a grocery store and home improvement store with associated parking. The retail area is comprised of moderate to large structures set back from the street and large parking lots closer to the roadway. Across Broadway from the Rezoning Sites, a vacant lot is a prominent visual feature adjacent to rural residential development, similarly set back from the roadway and buffered by trees or ruderal vegetation at the property boundary. The residence is designed in a vernacular ranch style with an accessory dwelling unit and a six-foot wooden fence around most of the property. Beside this residence, the open land appears to have been cultivated with row crops. From Broadway, looking northeast, the Sonoma Mountains are visible on the distant horizon, but intervening development limits these views from the Rezoning Sites themselves (Figure 4.1-19).

Despite the views of the mountains from Broadway and the large, mature oak trees, the area around the Rezoning Sites in Sonoma lack a degree of vividness due to the low level of unity among the architectural styles, the weedy frontages, and various abandoned furniture and other debris along the roadway. The rural residential style of development is variably maintained and thus lacks a coherent, unified appearance, making the overall visual quality moderate. These Rezoning Sites have high site sensitivity and new development would likely be co-dominant.

Figure 4.1-17 SON-1 and SON-3, Looking Southwest

Source: Google Earth 2020

Figure 4.1-18 SON-2 and SON-4, Looking Southwest

Source: Google Earth 2020

Figure 4.1-19 View of Sonoma Mountains from Broadway, Looking Northeast with SON-1, SON-2, SON-3, and SON-4 to the Left

Source: Google Earth 2020

Graton

Graton is in western Sonoma County, north of the larger city of Sebastopol, just south of Forestville, and about 20 miles east of the Pacific Ocean. Historically, agriculture in the area focused on apple production but like much of Sonoma County, in recent decades the region transitioned to wine grape production. State Route 116 forms the eastern boundary and Atascadero Creek forms the western boundary of the town. Development in the community is characterized by the same type of clustered single-family residential neighborhoods mixed with small farms and orchards as other small, rural communities in Sonoma County. The neighborhoods feature mature trees and other vegetation, narrow streets without sidewalks, and deep setbacks. The small downtown area on Graton Road off State Route 116 is characterized by structures that appear to have been built in the late nineteenth and early twentieth centuries; structures that house small shops, restaurants, and other businesses. Other historic structures appear to house light-industrial businesses or to be unused. Most area residents live in single-family homes in neighborhoods intermixed with apple orchards, vineyards, truck farming, and other agricultural production. Throughout the town, views from roadways are of trees and ridgelines on the distant horizon.

Five Rezoning Sites are identified throughout Graton. GRA-1 is a vacant lot with limited vegetation, with a wrought-iron fence on the street side (Figure 4.1-20). Across Donald Street, single-family homes are situated on large lots with mature landscaping. Most of these are situated close to the roadway and feature low fences at the property edge. The design of the residences is a mix of styles that, while inconsistent, maintain a sense of unity as a rural residential community that coheres with the narrow roadways and village-style development. East of GRA-1, a preschool occupies a structure that appears to have been constructed during the early twentieth century and that has

undergone periodic patching on the clapboard siding where needed. Mature trees occur intermittently along Donald Street, going east, and add to the rural quality of the neighborhood. West of GRA-1, a church with associated outbuildings and parking lot occurs at the corner of Donald Street and South Brush Street. There are no sidewalks, but the area near GRA-1 appears walkable and has an intimate, human-scale feeling. The site has low sensitivity and new development is likely to be co-dominant.

Figure 4.1-20 GRA-1 Looking West

Source: Google Earth 2020

GRA-2 is a large parcel on the northeast edge of town, with what appear to be provisional industrial and residential (mobile home) structures on site. The West County Regional Trail aligns with the front of the property, parallel to Ross Road where a residential property surrounded by trees is also situated (Figure 4.1-21). Across Ross Road from GRA-2, residential development includes a mix of cottage-style and Modern style architecture that are unified by their shared strength of design, even though the styles themselves are quite different. Landscaping is minimal but in keeping with the design quality. Further along Ross Road, toward the heart of Graton, industrial uses occur in structures that appear to pre-date World War II and thus bring an urban quality to the neighborhood as it transitions into town. Even with the mix of uses, there is a unity to the setting that has a certain level of vividness. The visual quality at the site is low, and the site sensitivity is low. New development is likely to be co-dominant.

Figure 4.1-21 GRA-2 from Ross Avenue Looking West (Beyond Bike Path)

Source: Google Earth 2020

GRA-4 is at the southwest corner of Hicks Road and Jeanette Avenue. It is bordered by residential uses that appear to have been constructed in the late nineteenth or early twentieth century, in some cases. Dense landscaping, including box hedges screen most of the properties from the roadway and trees overarch the street, making a shady lane (Figure 4.1-22). Across Jeanette Avenue, a very large residence is situated back from the street and features an ornate, metal gate and mature trees at the border. Next to this house, a small orchard is visible behind a row of box hedges. Along Hicks Road, similarly large houses are set back from the street on large lots and feature mature landscaping. The neighborhood does not feature any sweeping vistas, but displays unity in its design and landscaping, consistent with a rural residential setting. The shady lanes and mix of older and newer development are vivid and intact, although they do not have a strong sense of unity, giving the site moderate sensitivity. New development is likely to be co-dominant.

GRA-3 and GRA-5 are adjacent and both front State Route 116/Gravenstein Highway at the southwest and southeast corners (respectively) of its intersection with Graton Road, which is zoned SR as a scenic resource (Highway 116 Scenic Corridor) and LG/116, a designation that protects community character. These sites are close to commercial uses on the northeast side of Graton Road. The commercial uses feature a rustic-style design in keeping with an agricultural community. The structures are close to the roadways with generous landscaping, giving them a sense of unity with their surroundings. On State Route 116, GRA-5 is adjacent to residential uses on Graton Road and State Route 116 that have a farmhouse-style design and densely planted landscape. Some of the houses appear to have been built during the early twentieth century and those built more recently draw on the design of the older structures that unifies the development. GRA-5 also has many mature trees throughout the site, with particularly dense stands between the site and adjacent residences to the south (Figure 4.1-23).

Figure 4.1-22 GRA-4 from the Corner of Hicks Road and Jeanette Road, Looking Southeast

Source: Google Earth 2020

Figure 4.1-23 GRA-5 from Graton Road Looking South

Source: Google Earth 2020

Crossing State Route 116, Graton Road becomes Frei Road; GRA-3 occupies the southwest corner and is adjacent to residential uses set back from the roadways on large lots to the south and east. GRA-3 has many mature trees on the site, some of which screen it from the roadways (Figure 4.1-24). Across Frei Road, residential development is set back from the roadway on large lots and designed in a mix of California ranch style, farmhouse-style, and a style that draws on Modern architecture. Densely planted, mature trees overarch the roadway and flowering shrubs and other vegetation form the understory. Overall, the sites have a degree of intactness and vividness based on with the mature, dense landscaping, but lack unity as they offer no long-range views and development is not part of a larger design plan. Nonetheless, as both Rezoning Sites are zoned LG/116, the site sensitivity is high and new development could be dominant, depending on the design and amount of vegetation removed during project implementation.

Figure 4.1-24 GRA-3 from Frei Road and State Route 116 Looking Southeast

Source: Google Earth 2020

Santa Rosa

Santa Rosa is the county seat for Sonoma County and its largest city. It straddles the Highway 101 corridor in the central part of the County and is the commercial, governmental, and cultural hub of a County known for its wineries, restaurants, and cycling and other recreation opportunities. The eastern part of the city includes foothills of the Sonoma Mountains, while the western portion lies within the Santa Rosa Plain. Santa Rosa Creek bisects the city, running east to west into the Laguna de Santa Rosa. Numerous other creeks also run through or near the city limits. Santa Rosa features a wide range of land uses: light industrial, residential, office, and agricultural. Santa Rosa is a visually and culturally rich community with an historic downtown and surrounded by historic residential districts; other development includes low-density hillside neighborhoods and rural vistas on the edges of the city. The Sonoma Mountain foothills are visible from many parts of the city.

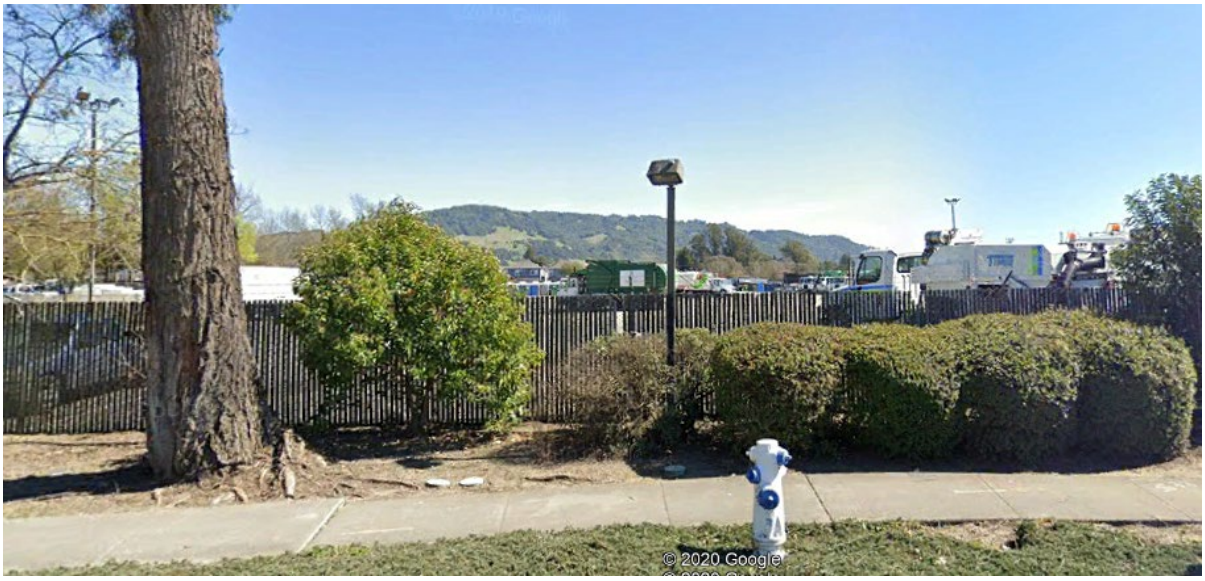
The Rezoning Sites identified in Santa Rosa are all along the Highway 101 corridor, south of the incorporated city limits (see Figure 2-7). Sites are discussed here from north to south, west of Highway 101, and then north to south, east of Highway 101. SAN-7 and SAN-6 are situated west of the Northwest Pacific Railroad tracks, in an area characterized by light industrial, office, and institutional uses development but that is also zoned VOH. SAN-7 is closest to the northern Santa Rosa city limits and is across Standish Avenue from the Amarosa Academy, an alternative high school. The site is an undeveloped field with some mature trees and ruderal vegetation. From Standish Avenue, the hillsides are visible, but the view cannot be characterized as scenic or notable (Figure 4.1-25). Site sensitivity is low and development would be co-dominant. Refer to Section 4.4, *Biological Resources*, for information regarding tree preservation and protection.

Figure 4.1-25 SAN-7 Looking East with Sonoma Mountain Foothills in the Background

Source: Google Earth 2020

SAN-6 is just south of SAN-7, also fronting Standish Avenue. It is currently used to store heavy equipment; it is fenced and developed with some industrial structures. It is also in an area zoned VOH, but oak habitat does not appear present on the sites. Sidewalks and industrial fencing border SAN-6 and adjacent uses include light industrial to the south and a neighborhood park on the east side of the railroad tracks. The Sonoma Mountains are visible in the background looking across the site, but the view lacks vividness and unity due to industrial context (Figure 4.1-26). Light industrial structures on the west side of Standish Avenue, across from the sites, are low, rectangular structures with corrugated metal siding painted shades of beige, and limited fenestration. Most feature some landscaping, but it is mostly limited to low shrubs and hardscaping, with a few, scattered trees. The structures are consistent in appearance with light industrial uses but feature no distinctive design that might distinguish them from one another. The lack of variety reduces any potential vividness in the area, further reduced by the scattered storage of vehicles and equipment. Views are available across the site but the clutter of the structures and associated industrial components reduces the intactness of those views. Site sensitivity is low and development would be co-dominant.

Figure 4.1-26 SAN-6 Looking Southeast



Source: Google Earth 2020

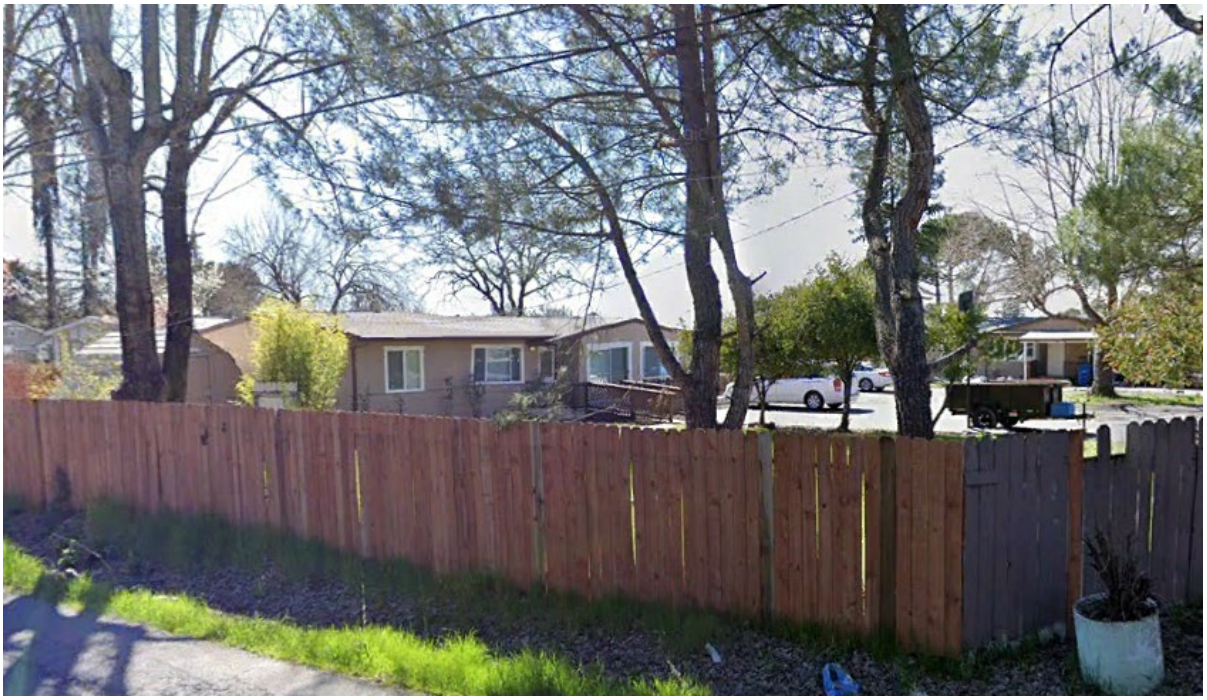
SAN-8 is a large, irregularly shaped site, just southeast of the previous two sites. It is south of Andy's Unity Park, a County park east of the railroad tracks, on Robles Avenue. SAN-8 is developed with industrial structures and is fenced with chain-link fitted with wooden slats. The fencing is painted different shades of light and dark brown. Ruderal vegetation grows intermittently between the fencing and the street. Looking east, the Sonoma Mountain foothills are not visible beyond the developed area and planted trees. Parked storage trailers and other industrial outbuilding-type structures present a cluttered, low-quality visual environment that is incongruous with the adjacent residential and recreational development (Figure 4.1-27). Lack of vividness and intactness and the lack of unity with surrounding development make the visual quality at this site low. Site sensitivity is low and new development would be co-dominant.

Figure 4.1-27 SAN-8 from Andy's Unity Park (Looking Southwest)

Source: Google Earth 2020

SAN-2 is a small parcel just east of SAN-8, facing Moorland Avenue. It is paved and occupied by residences of modular construction, along with associated outbuildings (e.g., sheds). Mature trees grow along Moorland Avenue and the parcel is zoned VOH. A wooden fence separates the site from the street and adjacent properties (Figure 4.1-28). Opposite the site, the residential properties to the east feature densely planted perimeter trees that screen the site and block views of the distant foothills. Adjacent residences vary in style and include some that appear to have been constructed during the early twentieth century. Others are of newer provenance but designed in a similar manner with gabled roofs and clapboard-style siding. Mature trees overarch the street, creating a shading lane traveling north on Moorland Avenue. While not particularly unified, the neighborhood has a village character that gives it a degree of vividness and moderate site sensitivity. New development would likely be co-dominant.

Figure 4.1-28 SAN-2 Looking Southwest from Moorland Avenue



Source: Google Earth 2020

SAN-9 is the final site on the west side of Highway 101. Located south of Todd Road, it is developed with light industrial uses, including a recycling service and a workshop where art classes are conducted, and studio spaces are made available to local artists. The site features scattered, mature trees and a deep setback from Todd Road (Figure 4.1-29). It is also zoned VOH. Intervening landscaping and other development prevent long-range views of the Sonoma Mountain foothills that are visible from the roadway, looking east. Opposite the site, residential development occurs facing and beyond Todd Road, accessed by small streets. The cottage-style structures have varied massing on adjacent sites, although paint schemes differ widely, and the surrounding fencing creates a solid horizontal plane in the foreground that detracts from the visual quality. Generally, the area has low to moderately low visual quality, as views into the distance, while scenic, are not expansive because of intervening development and much of the existing development does not possess distinction in terms of its form, style, or ability to contribute to a sense of place. The site has low sensitivity and new development would likely be subordinate.

Figure 4.1-29 SAN-9 from Todd Road, Looking Southeast

Source: Google Earth 2020

On the east side of Highway 101, SAN-4 faces Santa Rosa Avenue and is developed partially with a motel, a market/café, and a martial arts school. The site wraps around an adjacent restaurant (fast food) to the south to include a narrow strip of undeveloped land that borders another restaurant along Santa Rosa Avenue. The backside of the site is visible looking east from Highway 101, from which the Sonoma Mountains are partially visible behind intervening structures and scattered palm trees (Figure 4.1-30). From Highway 101, the rectilinear structures create an undifferentiated mass and ruderal vegetation, trash enclosures, and other scattered components add to the lack of unity. These obstruct the views of the mountains to such an extent that the vista is no longer intact, nor do these components contribute to a cogent sense of place. From Santa Rosa Avenue, views across the site are of the existing low-scale urban development (Figure 4.1-31). The structure's massing is disorganized and nondescript, similar to adjacent development patterns. Santa Rosa Avenue is a wide boulevard and the commercial and restaurant uses feature large, expansive parking lots close to the street with low, rectangular structures with flat roofs and rectangular facades closer to the middle or back of the lot. Across Santa Rosa Avenue from the site, a mobile home community, a multi-family residential development, and commercial and restaurant uses line the roadway.

The nearby foothills are visible looking east, but views are not intact due to intervening development. Limited to no landscaping further emphasizes the low horizontal line created by the flat rooftops of the mobile homes and retail uses. The multi-family development, however, introduces varied rooflines as they are two-story structures with staggered, gabled rooflines. The visual quality in this area is moderate to moderately low as many of the commercial and visitor-serving structures are in disrepair; provisional signage, irregular landscaping, and lack of overall unity make the area indistinguishable from any other aging retail corridor. Even though a portion of the site is in an SR-zoned area (the Highway 101 Scenic Corridor), it lacks unity and vividness and existing development blocks views of the surrounding landscape from Highway 101. Site sensitivity is low and new development is likely to be subordinate with other land uses and the landscape.

Figure 4.1-30 SAN-4 from Highway 101, Looking Northeast Across the Site

Source: Google Earth 2020

Figure 4.1-31 SAN-4 from Santa Rosa Avenue, Looking West

Source: Google Earth 2020

SAN-5, SAN-1, and SAN-3 are the easternmost Rezoning Sites in Santa Rosa, located off Brooks Avenue, a local access road off East Robles Avenue. This area is also zoned VOH, although oak woodlands are not visible on or near these sites. SAN-5 is undeveloped with some perimeter trees. Views across the site looking west are of limited visual quality due to intervening development (Figure 4.1-31 and Figure 4.1-32). North of the site, residential development near the street gives way to large lots used to store vehicles of various descriptions. Across Brooks Avenue to the east from SAN-5, vacant lots similarly used to store miscellaneous objects and vehicles are the

predominate visual feature. Mobile homes are situated on adjacent lots, along with storage units scattered across the lots. A chain-link fence with red strips inserted into the links surrounds the lot directly across from SAN-5. The area lacks intactness and unity, reducing the otherwise scenic quality of the area. Vividness is moderately low and site sensitivity is low because, although the site is not urbanized, it lacks native vegetation and other distinctive visual attributes. New development is likely to be dominant as the site has no landscaping or nearby development.

Figure 4.1-32 SAN-5 Looking West

Source: Google Earth 2020

Moving south, SAN-1 is an undeveloped fenced site used for storing modular home components and vehicles (Figure 4.1-33). Views across the site are limited to the trees near development to the west. Looking east, the foothills are visible behind the residential development across the street from the site, but these are compromised by the prominence of the single-family home and the modular office structures that serve the business next to the home, further contributing to the lack of unity in the area. The sites are not urbanized but site sensitivity is low due to lack of vividness and unity. New development is likely to be dominant, as the site has no landscaping or nearby development.

SAN-3 is an undeveloped lot with a wire fence and a few mature but unmaintained trees (Figure 4.1-34). Looking west, the views are the same as from the other two sites, limited by intervening development. East of the site, the view across another vacant lot offers clear views of the foothills, despite the various vehicles and sheds stored on the lot. The property to the south of SAN-3 is developed with a two-story, single-family home set back far from the street. A wooden fence separates it from SAN-3. The site is not in an urbanized area, but it is not on a prominent ridgeline and has no significant natural vegetation, giving it a low sensitivity. New development is likely to be dominant as the site has no landscaping or nearby development.

Figure 4.1-33 SAN-1 Looking East

Source: Google Earth 2020

Figure 4.1-34 SAN-3 Looking Northeast

Source: Google Earth 2020

Finally, SAN-10 is northeast of the intersection of Santa Rosa Avenue and Mountain View Avenue. Closest to Santa Rosa Avenue, the site is developed with agricultural industrial uses and is partially paved. The site contains distributed temporary office trailers, tanks, and storage structures, along with parked cars and trucks. A recreational trail adjoins the site. Some mature trees border the property to the north, but the eastern foothills are visible beyond the single-story development and the trees (Figure 4.1-35). The eastern portion of the site is used to store equipment but is otherwise undeveloped. A mature redwood grows at the corner closest to Santa Rosa Avenue. Also zoned VOH, most of the trees occur along the bike path or at the perimeter of the parcel and not on the site directly.

Figure 4.1-35 SAN-10 Viewed from the Northern Boundary, Looking East

Source: Google Earth 2020

Similar views through the sight are visible from the roadway (Figure 4.1-36). A channelized creek lies north of the bike trail that borders the site. Adjacent uses include a landscaping supply company to the north and an automobile dealership with a paved parking area and a barn-like office structure to the south. Across Santa Rosa Avenue, uses include other agriculture and construction-supporting commercial businesses. Adjacent uses include light industrial/retail businesses serving the construction industry. Large yards with material stockpiles surround a small office with large signage on the roof. Opposite this business, another features modular units painted beige with a parking area and chain-linked fence. Beyond that, a used car lot includes a similarly non-descript modular office with large signage and cars parked in the large lot that fronts the property. The area has no sidewalks and limited landscaping. The lack of unity, generally undifferentiated quality of the structures, and stockpiled construction materials render the visual quality is low to moderately low for the area around SAN-10. Site sensitivity is low and new development that replaces existing development will likely be co-dominant with adjacent uses and the landscape.

Figure 4.1-36 SAN-10 Viewed from the Southern Boundary, Looking North

Source: Google Earth 2020

Glen Ellen/Agua Caliente

Glen Ellen is a roughly 2.1-square mile village along Arnold Drive west of State Route 12, about 6 miles northwest of Sonoma (County of Sonoma 2018). Situated in the Valley of the Moon, the area is defined by its rural, forested landscape; Sonoma Creek, which runs through town from north to south; and its history. Once the home of the writer Jack London, Glen Ellen features historic structures in its walkable downtown and is the gateway to the Jack London State Historic Park, the Sonoma Valley Regional Park, and the Bouverie Wildflower Preserve. Arnold Drive runs the length of the community, north to south, along the eastern side of the community, and from its intersections with Chauvet Road to Gibson Road features two commercial centers in the town interspersed with single-family, residential development. The County of Sonoma identifies Arnold Drive through Glen Ellen as a Scenic Corridor (County of Sonoma 2020). The area has dense vegetation along the roadways and in developed areas. Beyond the Urban Service Area, Glen Ellen is surrounded by designated Scenic Landscape Units to the north and west, Community Separators to the south and east, and the parks to the south to the southeast.

Two sites are identified in Glen Ellen for the proposed project: GLE-1 and GLE-2. They are situated behind adjacent properties near the southeast corner of Arnold Drive and Carquinez Avenue in an area zoned SR (Arnold Drive Scenic Corridor). The neighborhood features a mix of cottage-style residential development, some of which was constructed in the late nineteenth and early twentieth centuries, retail and restaurant uses, and light-industrial facilities (e.g., car repair, auto body shop), also likely constructed in the early twentieth century. Single-family cottages directly border the site and single-family and multi-family uses are adjacent (i.e., across Carquinez Avenue). The single-family residences are small and close to the street. They are painted white, blue, and other colors that reflect aspects of the surrounding landscape. The multi-family, two-story structure across the street is less distinctive, with simple rectilinear forms interrupted by limited fenestration and other features that appear to have been added after initial construction. The landscaping is dense and features a mix of flowering deciduous trees and evergreens. Nearby businesses occur in small structures that appear to have been constructed in the early twentieth century and which have been renovated to include landscaping, muted paint colors, and wall murals. From Carquinez Avenue, ridgelines are visible west of Arnold Avenue and rock walls, densely planted, mature trees, and renovated structures create a unified sense of place. GLE-1 and GLE-2 feature mature trees and flowering shrubs at the perimeter (Figure 4.1-37). From some locations in Glen Ellen, the foothills are visible from the roadways. The visual quality is high in this area as the neighborhood adheres to the small, rural village design specified in the community design guidelines. Site sensitivity is high and new development that differs substantially from adjacent uses would be dominant.

Figure 4.1-37 GLE-1 and GLE-2 Seen through Adjacent Residential Development, from Carquinez Avenue Looking Southwest

Source: Google Earth 2020

Agua Caliente is approximately 3 miles south of Glen Ellen along State Route 12. Expansive views of the Sonoma-Napa mountains and vineyard covered hillsides are the dominant visual feature where the roadway extends through this community and the Valley of the Moon. Agua Caliente is part of the broader Sonoma Valley area known generally as "The Springs," and is developed at low and medium densities, with planned community residential development mixed with commercial uses along State Route 12.

Three Rezoning Sites are identified in Agua Caliente. AGU-1 and AGU-2 are situated in an area with residential development on most of its irregular borders, with institutional and office uses situated to the east, along Verano Avenue and is zoned VOH. The residential neighborhood west of the proposed sites features single-family homes set back from the streets with mature trees and other landscaping. The style is a mix of contemporary cottage and ranch, interspersed with some early twentieth century-era bungalows. Two-story, multi-family units are designed in the same manner and cohere in style, with gabled roofs, clapboard-style siding, and grey and white paint schemes. The streets are wide, and trees are planted near property boundaries. Some yards feature low fences and parking is limited to driveways and streets. The medical office complex on the east side of the Rezoning Sites is a two-story structure with a gabled roof and intermittent balconies that break up the rectilinear massing. It is painted a deep beige color and features mature trees at the perimeter and throughout the site. AGU-1 and AGU-2 are only visible from Verano Avenue as the backs of adjacent development surrounds the site on all sides. Dense vegetation screens the site from the street (Figure 4.1-38). The general visual quality of the area is high due to the unity of architecture, human scale of development, and mature landscaping. Site sensitivity is moderate and new development on these sites would likely be co-dominant, particularly if limited trees are removed.

Figure 4.1-38 AGU-1 and AGU-2 Viewed from Verona Avenue Looking Northwest

Source: Google Earth 2020

AGU-3 is west of the other sites, closer to Arnold Drive, off Craig Avenue and is zoned VOH-X. The site is currently developed with a church and has landscaped trees and lawn throughout (Figure 4.1-39). Other adjacent uses include single- and multi-family residential development with fenced yards and varying degrees of landscaping. Similar to development throughout the community, architectural styles draw on California bungalow and ranch styles popular in the early and mid-twentieth century. Some structures appear to be from this era and others are newer but follow the same style, giving the neighborhood a sense of unity. Even though the eastern foothills are quite close to the town, they are not visible from Craig Avenue due to intervening development and forestation. On Railroad Avenue, however, the eastern ridgeline is visible looking across the site. The visual quality in this neighborhood is high as coherent architectural styles, paint schemes, and landscaping give the area a unified appearance. Site sensitivity is moderate and new development would likely be co-dominant, particularly if limited tree removal occurred.

Figure 4.1-39 AGU-3 from Railroad Avenue Looking East

Source: Google Earth 2020

Penngrove

Penngrove is in central Sonoma County, southeast of Santa Rosa, along the Highway 101 corridor in an area where the Sonoma Mountains form a continuous, visible backdrop. Extensive rural residential development is situated in and around Penngrove, and the small, historic downtown resembles that of other communities in the County. Livestock grazing and forage crops are the predominant type of agriculture view in the rural areas, along with vineyards. Eight Rezoning Sites are proposed throughout the area. They are described below from north to south.

PEN-6 is at the northernmost boundary of the urban service area in a rural residential area. The site is elevated from the street and currently has several single-family homes, mature trees, and maintained meadow/open space (Figure 4.1-40). Across Old Adobe Road, single-family residential uses feature modular home and outbuildings in a vernacular ranch style painted colors ranging from gray to terracotta. Some structures appear to be from the early twentieth century era but are not maintained. Windmills and water towers are visible from the roadway and add to the rural sense of place. The Penngrove School is situated on a rise in the topography just east of PEN-6 and features a Mission Revival-style architecture. The grounds feature numerous mature oak trees at the perimeter. Overall, the area around PEN-6 lacks visual unity, as the structure's conditions vary, and some paint schemes contrast strongly with the landscape. The vegetation is mature but sporadic, sometimes adding to the visual quality, but other times not as it appears overgrown and lacking maintenance. Site sensitivity is moderate and new development will likely be co-dominant.

Figure 4.1-40 PEN-6 Viewed from Old Adobe Drive Looking North

Source: Google Earth 2020

PEN-5 is situated at the T-intersection of Petaluma Hill Road and Woodward Avenue on the northeast side of the railroad tracks. The lot is developed with a small structure that appears to pre-date the 1950s. The lot borders the town's Main Street; adjacent uses include historic-era commercial and mixed-used development. The roadway/transportation infrastructure include overhead signals, railroad crossing protection facilities, and aboveground utility transmission lines. Mature trees grow intermittently, and development is limited. The visual quality is moderate at this site, as the industrial infrastructure does not cohere with the older, historic development (Figure 4.1-41). The site is zoned SR (Scenic Corridor), making site sensitivity high. New development would likely be co-dominant.

PEN-1, PEN-3, PEN-8, and PEN-9 are sited diagonally south of Main Street from PEN-5, on adjacent lots, between Penngrove Community Park and the railroad tracks. They feature a mix of newer and historic-appearing commercial/light-industrial development. The newer commercial/industrial uses features materials that make them visually compatible with the older structures and with a rural/industrial setting, as befits a depot stop in an historic railroad town (Figure 4.1-41). PEN-9 is beyond the commercial uses and includes a barn and associated structures (Figure 4.1-42). The structure has a character in keeping with the nearby commercial and industrial uses. The undeveloped areas around the structures includes an unpaved driveway and grassy areas. The site appears to be used to store vehicles as well.

Beyond these uses and on the other side of the railroad tracks, a storage facility is directly opposite the tracks, and residential development occurs as the foothills begin to rise. These are the same style of early twentieth century bungalow architecture seen throughout Sonoma County. Mature trees buffer these homes from the railroad traffic, to the extent possible. Along Petaluma Hill Road, commercial uses include single- and two-story structures, with clapboard-like siding, balconies, and attractive signage, adding to the unified feel of the area near the railroad tracks as a rustic depot town. PEN-1, PEN-3, PEN-8, and PEN-9 do not afford views of the nearby mountains due to intervening development, but mature trees and structures contribute to intactness and vividness throughout. PEN-1, PEN-3, PEN-8, and PEN-9 are zoned SR (Scenic Corridor) and VOH, and they are adjacent to development with a distinctive design, making site sensitivity high. New development will likely be co-dominant.

Figure 4.1-41 PEN-1, PEN-3, and PEN-8 Looking Southeast

Source: Google Earth 2020

Figure 4.1-42 PEN-9 Looking Southeast

Source: Google Earth 2020

PEN-2, PEN-4, and PEN-7 are further south, off Old Redwood Highway. These sites are large, rural/residential plots, with mature trees (Figure 4.1-43), and in the case of PEN-2 and PEN-4, historic-appearing barns. Hillsides are visible from the roadway looking southeast. Surrounding uses are rural-residential with large homes set back from the street on large parcels. Some feature low, split rail fencing and others have solid wood panel fences. Architectural styles vary from large, low ranch-style to modern redwood bungalow. Some neighboring parcels have small fruit orchards. The visual character is unified, even with the range of architectural styles and fencing treatments. The views of the foothills across the rolling, open landscape have a high degree of intactness, and, thus, the visual quality is high (Figure 4.1-44). None of these sites are zoned in a way that affords visual resources protection, but because of the rural setting and limited development, site sensitivity is moderate. New development would likely be dominant, based on design and building height and development density.

Figure 4.1-43 PEN-7 from the Northwest, Mature Trees on Horizon, Pasture in Foreground

Source: Google Earth 2020

Figure 4.1-44 PEN-2 (PEN-4 Beyond) Looking Southeast Toward the Sonoma Mountains

Source: Google Earth 2020

Petaluma

Petaluma is in the southern end of the County, 37 miles north of San Francisco. It features with many historic structures including many that date from the late nineteenth and early twentieth centuries and contribute strongly to its aesthetic. The four sites proposed for rezoning are in the County-designated Urban Service Area, just outside the city limits and just north of the historic downtown area and are zoned SR as part of the scenic corridor along Bodega Avenue. The area is somewhat developed with residential, commercial, and industrial uses, but the edges give way to agricultural uses in a rolling topography with mature trees. PET-1 and PET-3 are developed with commercial and residential uses at the north ends of the parcels (Figure 4.1-45).

Figure 4.1-45 PET 1 and PET-3 Looking Southwest from Bodega Avenue

Source: Google Earth 2020

PET-2 is developed closest to Bodega Avenue with multi-family residential development and a paved parking area. The rest of the lot is undeveloped. The structure's envelope occupies a long rectangle with a Western vernacular façade at the end closest to the street. It is painted pale yellow and feature no significant landscaping, particularly trees (Figure 4.1-46). Across the street, a vacant lot is bordered by single-family residences in the same early twentieth century bungalow and later ranch styles as those described above. Associated structures appear to include an accessory dwelling unit and a small barn, all of which are painted different colors from one another.

Figure 4.1-46 PET-2 and PET-4 Looking Southwest from Bodega Avenue

Source: Google Earth 2020

Adjacent to PET-2, PET-4 wraps around a lot developed with a residence that appears to date from the late nineteenth century. The parcel slopes gently southward and mature trees are visible at the top of the hill (Figure 4.1-47). The residence at the front of the site is one story in the Folk Victorian Farmhouse style and appears to be well maintained. The garden is also maintained, and the house is painted in a blue color that reflects its place in the landscape. Other adjacent uses include a pre-

World War II era, single-story residence just northwest of the Petaluma city limits, beyond a vacant lot that retains some old barns near the back of the property. On the north side of Bodega Avenue, residences in the style of early twentieth century bungalows line Bodega Avenue, beyond the Petaluma city limits. Large stands of mature trees occur between houses and the roadway.

The area has a moderately high degree of vividness, unity, and intactness, as the views from the roadway are of the surrounding countryside with its classic oak-studded rolling hills. Some historic-era residential structures dominate the built environment views. The landscape, as described above, is quintessentially Californian and western. Site sensitivity is high at all three locations, due to SR zoning and some potentially historic architecture. New development has the potential to be dominant, depending on design, height, and density.

Figure 4.1-47 PET-4 Visible Beyond Residence near Bodega Avenue

Source: Google Earth 2020

4.1.4 Greenbelts, Greenways, and Expanded Greenbelts

Although they are not officially designated as protected areas, greenbelts are discussed in the General Plan EIR as "areas that function as open space buffers around cities and county urbanized areas, much like Community Separators" (County of Sonoma 2006:4-11.5). These areas are eligible for protection as they can contribute to scenic preservation, among other things. Priority greenbelts were identified in the General Plan, corresponding to scenic landscape units throughout the County.

Expanded greenbelts are those rural, open space lands that provide a 1-mile buffer beyond cities that generally serve to preserve the rural character of the region. They comprise a continuous, 1-mile band along major roadways and urbanized areas in the County along State Route 12, Highway 101, and State Route 116. None of the Rezoning Sites occur within greenbelts, greenways, or expanded greenbelts.

4.1.5 Community Separators

Community Separators are a characteristic that distinguishes Sonoma County from many other parts of the Bay Area. These are rural open spaces, agricultural lands, and other natural resource lands that separate cities and other communities, prevent sprawl and protect natural resources. They occur throughout the County and are protected by goals and policies in the General Plan Land Use

Element and Open Space and Resources Element. The Rezoning Sites are not situated within any Community Separator in the County.

4.1.6 Light and Glare

For purposes of this analysis, light refers to light emissions (brightness) generated by a source of light. Stationary sources of light include exterior parking lots and security lighting; moving sources of light include the headlights of vehicles driving on roadways near the Rezoning Sites. Streetlights and other security lighting also serve as sources of light in the evening hours. Highly visible lights at night can disrupt views of the night sky and have the potential to be seen for miles if geography or vegetation do not intervene. Moving sources of light (i.e., vehicles) easily catch the eye and are difficult to ignore.

Light pollution is an adverse effect of man-made light and can include urban sky glow, glare, and light trespass. Excessive lighting of this type can significantly change the character of rural and natural areas by making the built environment more prominent at night and creating visual clutter (International Dark Sky Association 2020).

The current conditions in the more rural areas include limited light from moving vehicles, street lighting, and structure lighting (both interior lights that emanate from windows and exterior lights in place for security or safety). There is little light spillage from developed uses onto adjacent uses and very little interference with night sky viewing. In more developed areas, lighting is consistent with urban and suburban development, including some streetlights and external security lighting. In developed rural residential areas, light conditions are more intense than the rural areas but less than the sites at the edges of larger cities (e.g., Santa Rosa, Sonoma).

Glare is defined as focused, intense light emanated directly from a source or indirectly when light reflects from a surface. Daytime glare is caused in large part by sunlight shining on highly reflective surfaces at or above eye level. Reflective surfaces area associated with structures that have expanses of polished or glass surfaces, light-colored pavement, and the windshields of parked cars.

Throughout the County, glare is limited by various factors: forestation, limited large or expansive parking lots, and design guidelines in the General Plan that regulate the character of new development and that include placing parking areas out of the view of newly implemented streetscaping (County of Sonoma 2018).

4.1.7 Regulatory Setting

a. Federal Regulations

No existing federal regulations pertain to the visual resources in the project area.

b. State Regulations

State Scenic Highway Program

Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way, that traverses an area of exceptional scenic quality. Suitability for designation as a State scenic highway is based on vividness, intactness, and unity (Caltrans 2022):

1. Vividness is the extent to which the landscape is memorable. This is associated with the distinctiveness, diversity, and contrast of visual elements. A vivid landscape makes an immediate and lasting impression on the viewer.
2. Intactness is the integrity of visual order in the landscape and the extent to which the natural landscape is free from visual intrusions (e.g., buildings, structures, equipment, grading).
3. Unity is the extent to which development is sensitive to and visually harmonious with the natural landscape.

Two State-designated scenic highways are in Sonoma County, as described above, and portions of these travel near some of the Rezoning Sites, with those in scenic resource areas being listed in Table 4.1-2.

c. Local

Sonoma County General Plan

The Scenic Resources section of the Open Space & Resource Conservation Element of the General Plan provides the following goals and policies concerning aesthetics, visual resources, and community design; they apply to the Rezoning Sites throughout the County, where appropriate.

Goal OSRC-3: Identify and preserve roadside landscapes that have a high visual quality as they contribute to the living environment of local residents and to the County's tourism economy.

Objective OSRC-3.1: Designate the Scenic Corridors on Figures OSRC-5a through OSRC-5i along roadways that cross highly scenic areas, provide visual links to major recreation areas, give access to historic areas, or serve as scenic entranceways to cities.

Objective OSRC-3.2: Provide guidelines so future land uses, development and roadway construction are compatible with the preservation of scenic values along designated Scenic Corridors.

Policy OSRC-3a: Apply the Scenic Resources combining district to those portions of properties within Scenic Corridor setbacks.

Policy OSRC-3b: For development on parcels located both within Scenic Landscape Units and adjacent to Scenic Corridors, apply the more restrictive siting and setback policies to preserve visual quality.

Policy OSRC-3c: Establish a rural Scenic Corridor setback of 30 percent of the depth of the lot to a maximum of 200 feet from the centerline of the road unless a different setback is provided in the Land Use Policies for the Planning Areas. Prohibit development within the setback with the following exceptions (excerpted):

(5) Other new structures if they are subject to design review and (a) they are associated with existing structures, (b) there is no other reasonable location for the structure, (c) the location within the setback is necessary for the use, or (d) existing vegetation and topography screen the use.

(6) Compliance with the setback would render the parcel unbuildable.

Policy OSRC-3e: In conjunction with Section 2.5 “Policy for Urban Design”, incorporate design criteria for Scenic Corridors in urban areas.

Goal OSRC-4: Preserve and maintain views of the nighttime skies and visual character of urban, rural and natural areas, while allowing for nighttime lighting levels appropriate to the use and location.

Objective OSRC-4.1: Maintain nighttime lighting levels at the minimum necessary to provide for security and safety of the use and users to preserve nighttime skies and the nighttime character of urban, rural and natural areas.

Objective OSRC-4.2: Ensure that nighttime lighting levels for new development are designed to minimize light spillage offsite or upward into the sky.

Policy OSRC-4a: Require that all new development projects, County projects, and signage utilize light fixtures that shield the light source so that light is cast downward and that are no more than the minimum height and power necessary to adequately light the proposed use.

Policy OSRC-4b: Prohibit continuous all-night exterior lighting in rural areas, unless it is demonstrated to the decision-making body that such lighting is necessary for security or operational purposes or that it is necessary for agricultural production or processing on a seasonal basis. Where lighting is necessary for the above purposes, minimize glare onto adjacent properties and into the night sky.

Policy OSRC-4c: Discourage light levels that are in excess of industry and State standards.

Goal OSRC-5: Retain and enhance the unique character of each of the County's unincorporated communities, while accommodating projected growth and housing needs.

Objective OSRC-5.2: Establish community character as a primary criterion for review of projects in Urban Service Areas.

Policy OSRC-5a: Develop Urban Design Guidelines appropriate for each Urban Service Area in unincorporated Sonoma County that reflect the character of the community.

Policy OSRC-5b: Use the following general urban design principles until Urban Design Guidelines specific to each Urban Service Area are adopted.

(1) Promotion of pedestrian and/or bicycle use
(2) Compatibility with adjacent development
(3) Incorporation of important historical and natural resources
(4) Complementary parking out of view of the streetscape
(5) Opportunities for social interaction with other community members
(6) Promotion of visible access to buildings and use areas
(7) Appropriate lighting levels

Goal OSRC-6: Preserve the unique rural and natural character of Sonoma County for residents, businesses, visitors, and future generations.

Objective OSRC-6.2: Establish Rural Character as a primary criterion for review of discretionary projects, but not including administrative design review for single family homes on existing lots outside of Urban Service Areas.

Policy OSRC-6a: Develop design guidelines for discretionary projects in rural areas, but not including administrative design review for single family homes on existing lots, that protect and reflect the rural character of Sonoma County. Use the following general design principles until these Design Guidelines are adopted, while assuring that Design Guidelines

for agricultural support uses on agricultural lands are consistent with Policy AR-9h of the Agricultural Resources Element.

(1) New structures blend into the surrounding landscape, rather than stand out.

(2) Landscaping is included and is designed to blend in with the character of the area.

(3) Paved areas are minimized and allow for informal parking areas.

(4) Adequate space is provided for natural site amenities.

(5) Exterior lighting and signage are minimized.

The Land Use Element also includes policies that affect the visual character of new development in the County.

Objective LU-15.4 Maintain the "rural village" character of Forestville through design development standards that support small-scale development with substantial open space and native landscaping.

Policy LU-15b: Require design review for major subdivisions within the Forestville Urban Service Boundary. Design review approval shall assure that:

(1) Project scale and design is consistent with existing rural village character,

(2) Project design gives priority to natural landscape over development, and preserves and enhances significant natural features,

(3) The project retains open space amenities associated with a rural lifestyle,

(4) The project provides for a variety of housing types and costs,

(5) Where appropriate to the natural terrain, houses are clustered to maximize open space. To the extent allowed by law, require a long-term scenic easement for the undeveloped portion of the property, and

(6) The project includes pedestrian access connecting new homes in a nearby commercial area.

Objective LU-20.4: Implement the Sonoma Valley Redevelopment Plan and the General Plan in a consistent manner. Encourage private redevelopment by providing flexibility in the range of land uses within the Redevelopment Area.

Policy LU-20hh: All new development in the Glen Ellen area (as designated in the Glen Ellen Development and Design Guidelines) shall comply with the Glen Ellen Development and Design Guidelines, which are part of the County Development Code.

Sonoma County Code

Chapter 26, Article 82 of the County Code provides general development standards that govern design, lighting, landscaping, and integration into the visual context of the area for new development. This section also provides limitations on grading, removal of existing landscaping, and limitations on height and mass of buildings and structures so they do not obstruct views of the landscape where it is designated as scenic.

Chapter 7D3 of the Sonoma County Code requires a landscape plan check for project to ensure their compliance with the Water Efficient Landscape Ordinance. The County provides pre-approved, scalable templates to ensure design and plant choice conform to the preferred and adopted protocols for residential landscaping.

Chapter 26, Article 64 provides general direction on development in the Scenic Resources (SR) Combining District including scenic corridors, community separators, and scenic landscape units. It specifies general limitations on scale, massing, density, and design, subject to design review.

The VOH-zoned areas are subject to ordinances that govern tree removal as follows:

> Except as provided in subsection (b), when any person cuts down or removes any large valley oak, or any small valley oaks having a cumulative diameter at breast height greater than 60 inches, on any property within the VOH district, such person shall mitigate the resulting valley oak loss by one of the following measures: (1) retaining other valley oaks on the subject property, (2) planting replacement valley oaks on the subject property or on another site in the County having the geographic, soil, and other conditions necessary to sustain a viable population of valley oaks, (3) a combination of measures (1) and (2), or (4) paying an in-lieu fee, which shall be used exclusively for valley oak planting programs in the County. (Article 67, Section 26-67-030)

Finally, some landscape units and scenic corridors are subject to lighting and signage regulations that include limits on intensity, size, and design. These are subject to review and approval based on compliance with the County Code. Throughout the County Code, night sky ordinances govern the degree to which development can be lighted at night, and include stipulations about shielding, orientation, and luminosity.

Community Separators Protection Ordinance

Community Separators are open space or agricultural lands that separate cities and other communities, contain urban development, and provide city and community identity by offering visual relief from continuous urbanization. On November 8, 2016, the Community Separators Protection Ordinance, commonly called Measure K, passed with 81.1 percent approval. Measure K extends voter protections to Community Separator lands for 20 years.

Glen Ellen Development and Design Guidelines

The community of Glen Ellen has specific design guidelines that govern development in the area. Key goals and policies address maintaining the natural environment, enhancing the image and aesthetic character, and preserving historic places, structures, and artifacts (County of Sonoma 1990).

Penngrove Main Street Design Guidelines

The Penngrove Main Street Design Guidelines were developed to preserve the historic resources and the traditional character of Penngrove's Main Street and promote a walkable, mixed-use, and economically viable commercial district. The guidelines were adopted with the expectation that they would encourage investment in the community's business district by providing some assurance that future development would occur consistent with the goals of preserving and improving Penngrove's Main Street (County of Sonoma 2010). The document offers clear, concise design guidance to assist property owners, business owners, architects, and designers in the development of project plans. County staff use the guidelines during project review and decision-making boards and commissions use them as a tool to evaluate development proposals and provide direction to applicants.

Sonoma 116 Scenic Highway Corridor Study

In 1983, the State legislature passed Assembly Bill (AB) 1026, that added State Route 116 from Highway 101 near Cotati to State Route 1 near Jenner in Sonoma County to the Master Plan of the State Highways Eligible for Scenic Highway Designation. The County had already designated State Route 116 as a scenic corridor, and following the passage of AB 1026, the Sonoma County Board of Supervisors passed a resolution to request that Caltrans conduct studies leading to designation of the route as an Official State Scenic Highway. The ensuing report Caltrans published offers visual quality assessments for scenic corridor segments that include areas where State Route 116 passes close to the Rezoning Sites.

However, under recent changes in State law, County design review regulations will only apply to most housing developments proposed on sites where they would be consistent with General Plan land use and zoning if the design regulations they are objective and quantifiable. Under the Housing Accountability Act (Government Code Section 65589.5), design review of most proposed housing development projects (and mixed-use projects where at least two-thirds of the square footage is designated for residential use) is limited to applying "objective, quantifiable, written development standards, conditions, and policies appropriate to, and consistent with" meeting the City's RHNA requirement. "[T]he development standards, conditions, and policies shall be applied to facilitate and accommodate development at the density permitted on the site and proposed by the development" (Government Code Section 65589.5(f)(5)). If a proposed housing development complies with all objective general plan, zoning, subdivision, and objective design review standards, the County may not deny the project or reduce its density unless it finds that the project would cause a "specific adverse impact" upon public health or safety that can't be mitigated in any other way. The finding of a specific adverse impacts must also be based on "objective, identified written public health or safety standards, policies, or conditions" in existence as of the date the application was deemed complete (Government Code Section 65589.5(j)).

4.1.8 Impact Analysis

The following section discusses the *CEQA Guidelines* Appendix G thresholds for aesthetics impacts and includes an evaluation of the setting described above relative to the thresholds listed below.

a. Significance Thresholds

The following thresholds of significance are based on *CEQA Guidelines* Appendix G. For purposes of this Program EIR, implementation of the proposed project may have a significant adverse impact if it would do any of the following:

1. Have a substantial adverse effect on a scenic vista
2. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway
3. In non-urbanized areas, substantially degrade existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality
4. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area

b. Methodology

Aesthetics impact assessments involve qualitative analysis that is subjective but informed by the County guidelines detailed above. Reactions to the same aesthetic conditions vary according to viewer taste and interests but are basically governed by the visual compatibility with the surroundings and existing development, coherence with design guidelines established by the jurisdiction, and use of high-quality materials that blend into the landscape. Ultimately, development decisions that prescribe aesthetic or design treatments for specific projects fall under the purview of the Sonoma County Planning Division and appointed or elected bodies charged with overseeing development permits. This project involves a countywide rezone of properties in unincorporated areas of Sonoma County and does not constitute a specific development proposal. This analysis focuses, therefore, on a general discussion of the aesthetic impacts on the Rezoning Sites by type, (i.e., rural, residential, industrial), in terms of the arrangement of built space to open space, the density and intensity of development, and how new development might visually fit with the existing landscape characteristic of the area. The impacts on visual character or quality attributable to projects that could be implemented after the rezone occurs were evaluated relative to visual conditions under buildout, estimated by those experienced from existing development in and around the County. Photographs and Google Earth imagery of each Rezoning Sites were reviewed in preparation of this analysis.

The existing conditions discussed in Section 4.1.2 have been evaluated using the County's guidelines and sites with potentially significant impacts have been assigned mitigation measures, as illustrated in the matrix in Table 4.1-5. This is summarized in Table 4.1-6 and discussed in detail below for each CEQA issue.

Table 4.1-5 Sonoma County Visual Analysis Significance Matrix

Sensitivity	Dominant	Co-Dominant	Subordinate	Inevident
Maximum	Significant	Significant	Significant	Less than significant
High	Significant	Significant	Less than significant	Less than significant
Moderate	Significant	Less than significant	Less than significant	Less than significant
Low	Less than significant	Less than significant	Less than significant	Less than significant

Source: County of Sonoma 2019

Table 4.1-6 Site Impacts and Recommended Mitigation Summary

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
GEY-1	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
GEY-2	Moderate	Co-Dominant	Less than significant	AES-5
GEY-3	Moderate	Co-Dominant	Less than significant	AES-5
GEY-4	Moderate	Co-Dominant	Less than significant	AES-5
GUE-1	Moderate	Co-Dominant	Less than significant	AES-5
GUE-2	Moderate	Co-Dominant	Less than significant	AES-5
GUE-3	Moderate	Co-Dominant	Less than significant	AES-5
GUE-4	Moderate	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
LAR-1	Low	Co-Dominant	Less than significant	AES-1, AES-2, AES-3, AES-4
LAR-2	Low	Co-Dominant	Less than significant	AES-5
LAR-3	Low	Co-Dominant	Less than significant	AES-5
LAR-4	Low	Co-Dominant	Less than significant	AES-5
LAR-5	Low	Co-Dominant	Less than significant	AES-5
LAR-6	Low	Co-Dominant	Less than significant	AES-5
LAR-7	Moderate	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
LAR-8	Low	Co-Dominant	Less than significant	AES-5
FOR-1	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
FOR-2	Moderate	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
FOR-3	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
FOR-4	Moderate	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
FOR-5	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
FOR-6	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
GRA-1	Low	Co-Dominant	Less than significant	AES-5
GRA-2	Low	Co-Dominant	Less than significant	AES-5
GRA-3	High	Co-Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
GRA-4	Moderate	Co-Dominant	Less than significant	AES-5

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
GRA-5	High	Co-Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
SAN-1	Low	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
SAN-2	Low	Co-Dominant	Less than significant	AES-5
SAN-3	Low	Dominant	Less than significant	AES-5
SAN-4	Low	Co-Dominant	Less than significant	AES-5
SAN-5	Low	Dominant	Less than significant	AES-5
SAN-6	Low	Co-Dominant	Less than significant	AES-5
SAN-7	Low	Co-Dominant	Less than significant	AES-5
SAN-8	Low	Co-Dominant	Less than significant	AES-5
SAN-9	Low	Co-Dominant	Less than significant	AES-5
SAN-10	Low	Co-Dominant	Less than significant	AES-5
GLE-1	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
GLE-2	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
AGU-1	Moderate	Co-Dominant	Less than significant	AES-1, AES-2, AES-5
AGU-2	Moderate	Co-Dominant	Less than significant	AES-1, AES-2, AES-5
AGU-3	Moderate	Co-Dominant	Less than significant	AES-5
PEN-1	High	Co-Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
PEN-2	Moderate	Dominant	Significant	AES-1, AES-2 AES-3, AES-4, AES-5
PEN-3	High	Co-Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
PEN-4	Moderate	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
PEN-5	High	Co-Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
PEN-6	Moderate	Co-Dominant	Less than significant	AES-5
PEN-7	Moderate	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
PEN-8	High	Co-Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
PEN-9	High	Co-Dominant	Significant	AES-1, AES-2, AES-3, AES-4 AES-5
PET-1	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
PET-2	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
PET-3	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
PET-4	High	Dominant	Significant	AES-1, AES-2, AES-3, AES-4, AES-5
SON-1	Moderate	Co-Dominant	Less than significant	AES-5
SON-2	Moderate	Co-Dominant	Less than significant	AES-5
SON-3	Moderate	Co-Dominant	Less than significant	AES-5
SON-4	Moderate	Co-Dominant	Less than significant	AES-5

*The potential impact statement listed in this table coincides with the impact evaluation decision matrix in the County's Visual Assessment Guidelines (2019) and does not apply to every CEQA issue for every site. Potentially significant impacts are indicated for specific sites and mitigation measures reiterated by CEQA issue area.

c. Project Impacts and Mitigation Measures

Threshold:	Would the project have a substantial adverse effect on a scenic vista?

Impact AES-1 **THE PROPOSED PROJECT WOULD FACILITATE DEVELOPMENT ON FOUR SITES WHERE PUBLIC VIEWS OF SCENIC VISTAS ARE AFFORDED. FULL BUILDOUT OF THESE SITES COULD BLOCK PUBLIC VIEWS OR OBSTRUCT THEM. THERE ARE NO FEASIBLE MITIGATION MEASURES TO REDUCE IMPACTS. THEREFORE, IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.**

Scenic vistas are considered expansive views from elevated positions, such as those from a roadway in the mountains, or views provided from a public place where the landscape is visible into the distance (e.g., looking at mountains across a field with little intervening development or vegetation). Sonoma County is characterized by a unique scenic beauty that combines agriculture and viticulture in flat valley floors extending into the rolling terrain of the foothills, redwood forests, and grazing lands. The Open Space and Resource Conservation Element of the 2020 General Plan designates several types of scenic resources, including Community Separators, Scenic Landscape Units, Scenic Corridors, and Scenic Highways (County of Sonoma 2016). These designated resources are discussed above; some of the Rezoning Sites are near these resources and have the potential to be affected by development that occurs because of the proposed project.

The project would result in rezoning of the Rezoning Sites so that they can be developed with various types of residential uses in the future, including multi-family units. The proposed project does not implement any development, but by changing the land use designation and zoning, it facilitates higher density residential development to occur.

Most of the 59 Rezoning Sites are in an Urban Service Area of the unincorporated County where public views would not be obstructed due to intervening development or mature vegetation. A few sites are in areas zoned SR but new development has the potential to affect public views of scenic vistas at only four sites, by introducing structures with height, massing, and orientation that could obstruct those views or block them entirely. Impacts would be significant to the following four SR-zoned Rezoning sites.

1. GEY-1
2. SAN-4
3. PEN-2
4. PEN-7

Mitigation Measures

There are no feasible mitigation measures available, as development facilitated by the project cannot be made to comply with subjective design guidelines to ensure preservation of public views of surrounding hillsides, forested lands, and areas near scenic vistas. Existing County Code design regulations will apply to the extent that they are objective. Thus, impacts would remain significant and unavoidable.

Threshold:	Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact AES-2 REZONING SITES IN FORESTVILLE AND GRATON BORDER A STATE SCENIC HIGHWAY, AND REZONING SITES IN GUERNEVILLE AND GLEN ELLEN ARE PROXIMATE TO STATE SCENIC HIGHWAYS. THEREFORE, SCENIC RESOURCES COULD BE AFFECTED IF INDIVIDUAL PROJECTS ARE VISIBLE FROM THESE ROADWAYS. THERE ARE NO FEASIBLE MITIGATION MEASURES TO REDUCE IMPACTS. THEREFORE, IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Sonoma County conducts design review in accordance with Article 82 of the Sonoma County Zoning Code. The project may include evaluation of project plans by the Sonoma County Design Review Committee, which may recommend design revision before permits are issued, when design review is a component of project approval. Design review may also be done administratively at the staff level. Specific design guidelines exist for the communities of Glen Ellen and Penngrove, and development in those areas would be subject to the relevant and applicable design guidelines (County of Sonoma 1990; County of Sonoma 2010). Rezoning Sites that fall within the LG/SR 116 zoning would be subject to design review according to the zoning code. Stipulations about development close to historic sites in Penngrove are also in place. The Sonoma County General Plan specifies design guidelines for development in areas of Forestville considered scenic corridors.

Most Rezoning Sites are in the Urban Service Area of the Unincorporated County where public views would not be obstructed due to intervening development or mature vegetation. A few sites have the potential to affect public views of scenic vistas by introducing height, massing, and orientation that could obstruct those views or blocks them entirely.

Rezoning Sites in Guerneville, Forestville, Graton, and Glen Ellen border or are close to State-designated scenic highways (State Route 116 and State Route 12). Because the projects considered on some of the Rezoning Sites could create significant impacts, at the locations discussed below.

Rezoning Sites close enough to a state-designated scenic highway that project implementation could result in a significant impact are as follows:

1. GUE-1
2. FOR-1
3. FOR-3
4. FOR-5
5. GRA-3
6. GRA-5
7. GLE-1
8. GLE-2
9. AGU-1
10. AGU-2

Significance After Mitigation

There are no feasible mitigation measures available, as development facilitated by the project cannot be made to comply with subjective design guidelines, and thus it cannot be guaranteed that projects on these ten sites would not remove or damage scenic resources within a State-designated

highway, particularly by changing the character of visual resources. Thus, impacts would remain significant and unavoidable.

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

Impact AES-3 INDIVIDUAL PROJECTS IMPLEMENTED ON 25 REZONING SITES HAVE THE POTENTIAL TO ADVERSELY AFFECT PUBLIC VIEWS AND COMMUNITY AESTHETIC CHARACTER. EVEN WITH THE INCORPORATION OF MITIGATION, IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

The project would facilitate development projects at some sites that could introduce incongruous styles and massing or could degrade visual character through the necessary removal of existing, mature trees. New development that is incompatible with the natural and built conditions as they exist could cause a significant impact to the visual quality by changing the visual nature of the site from open space to densely developed residential properties, or by introducing structures with unremarkable design into a neighborhood with a distinctive character informed, in part, by the architecture.

The Rezoning Sites with high site sensitivity and where development would be dominant or co-dominant, and sites with moderate sensitivity where development would be dominant are as follows:

1. GEY-1
2. GUE-4
3. LAR-7
4. FOR-1
5. FOR-2
6. FOR-3
7. FOR-4
8. FOR-5
9. FOR-6
10. GRA-3
11. GRA-5
12. GLE-1
13. GLE-2
14. PEN-1
15. PEN-2
16. PEN-3
17. PEN-4
18. PEN-5
19. PEN-7
20. PEN-8

21. PEN-9
22. PET-1
23. PET-2
24. PET-3
25. PET-4

Development projects at these sites would be subject to Mitigation Measures AES-1; however, impacts would remain significant and unavoidable.

Mitigation Measure

AES-1 SCREENING VEGETATION

Project landscape plans shall be designed with screening vegetation. Project landscape plans shall be approved by the County prior to building permit approval.

Significance After Mitigation

Even after implementation of Mitigation Measure AES-1, because development facilitated by the project cannot be made to comply with subjective design guidelines, it cannot be guaranteed that projects on these 25 sites would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Thus, impacts would remain significant and unavoidable.

Threshold:	Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact AES-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD CREATE NEW SOURCES OF LIGHT OR GLARE THAT COULD ADVERSELY AFFECT THE VISUAL ENVIRONMENT. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION MEASURES INCORPORATED.

In more rural areas where Rezoning Sites occur, very limited light and glare sources are present. In suburban areas, increased light emanates at night from streetlights, signage, and from light that spills from windows of residential and commercial uses. In more urbanized areas like Santa Rosa, a greater amount of nighttime light is present from the concentration of denser built areas and street and highway systems, all which cumulatively add to light spillage. Similarly, in areas with more vehicular travel (cities, highways), there is more glare from headlights at night over that in rural or semi-rural areas. Commercial districts with large parking lots and limited tree plantings would generate glare during the day as the sun reflects off car windshields. Furthermore, if structures are painted light colors or have extensive fenestration, and if grounds have sparse landscaping (see for example Figure 4.1-26, Figure 4.1-29, and Figure 4.1-45), then there would be an increased potential for glare to occur on a sunny day.

New development would have the potential to increase light and glare in and around the Rezoning Sites. Increased population would have associated increases in vehicular travel, potentially adding to the light conditions (headlights) and glare conditions (when cars are parked) in a manner that could be substantial. The County General Plan Goal OSRC-4 details the requirements to limit excess light generated by new development, preserve night sky visibility, and maintain lighting levels appropriate to rural residential uses. Nonetheless, implementation of projects at all the Rezoning Sites, over the course of time, would result in additional light from exterior lighting, interior light

that spills from windows, and from increased vehicular travel at night associated with the increase in population. Even with the population growth anticipated by the General Plan and other regional planning documents, the impacts of complete build-out of the Rezoning Sites could be significant regarding light and glare. Mitigation Measure AES-2 would be required to reduce the effects of light and glare.

Mitigation Measure

AES-2 EXTERIOR LIGHTING REQUIREMENTS

Project designs shall incorporate exterior lighting plans meeting the following minimum requirements.

1. Lighting shall be mounted low, downward casting, and fully shielded to prevent glare.
2. Lighting shall not wash out structures or any portions of the site.
3. Light fixtures shall not be located at the periphery of the property and shall not spill over onto adjacent properties or into the sky.
4. Flood lights are not permitted.
5. Parking lot fixtures shall be limited to 20 feet in height.
6. All parking lot and/or streetlight fixtures shall use full cut-off fixtures.
7. Lighting shall shut off automatically after businesses close and security lighting shall be motion-sensor activated.
8. Lighting plans shall be designed to meet the appropriate Lighting Zone standards from Title 24 effective October 2005 (LZ1 for dark areas, LZ2 for rural, LZ3 for urban) or successor regulations.

Significance After Mitigation

With implementation of Mitigation Measure AES-2, impacts from light and glare would be reduced to less than significant.

4.2 Agriculture and Forestry Resources

This section evaluates impacts to agriculture and forestry resources from implementation of the proposed project, including direct impacts associated with the conversion of agricultural land to non-agricultural use and potential indirect impacts to adjacent agricultural operations.

4.2.1 Setting

a. Overview of Regional Agriculture

Agriculture is one of the main industries in Sonoma County and provides a very significant base to the County's economy. Sonoma County can be divided into seven agricultural regions: West County, Russian River to Dry Creek, Santa Rosa Plain, Sonoma Valley, Sebastopol, Petaluma to Cotati, and West Petaluma to Sonoma Coast (County of Sonoma 2018).

Total production value for the County's agricultural sector in 2020 was $680,648,600 a 29 percent decrease from 2019 (County of Sonoma 2021). The wine grape crop is the most profitable and benefits from excellent growing conditions, including mild weather and a long growing season. This crop amounted to more than 52 percent of the gross value of agricultural commodities grown in the County in 2020. Other prominent crops include milk, poultry, cattle, nursery products, and vegetables. Table 4.2-1 lists the top agricultural commodities and their approximate values for 2020.

Table 4.2-1 2020 Sonoma County Crop Values

Crop	Value
Wine grapes – All	$357,511,500
Milk	$157,776,800
Miscellaneous Livestock and Poultry	$43,446,100
Miscellaneous Livestock and Poultry Products	$33,133,600
Cattle and Calves	$20,512,600
Nursery – Ornamentals	$19,477,600
Nursery – Miscellaneous	$15,031,600
Nursery - Bedding Plants	$7,745,300
Vegetables	$5,831,200
Sheep and Lambs	$5,306,400
Nursery - Cut Flowers	$4,037,000
Apples - Late Varieties	$2,398,800
Rye and Oat Silage Crops	$2,217,100
Apples - Gravenstein	$1,490,700

Source: County of Sonoma 2021

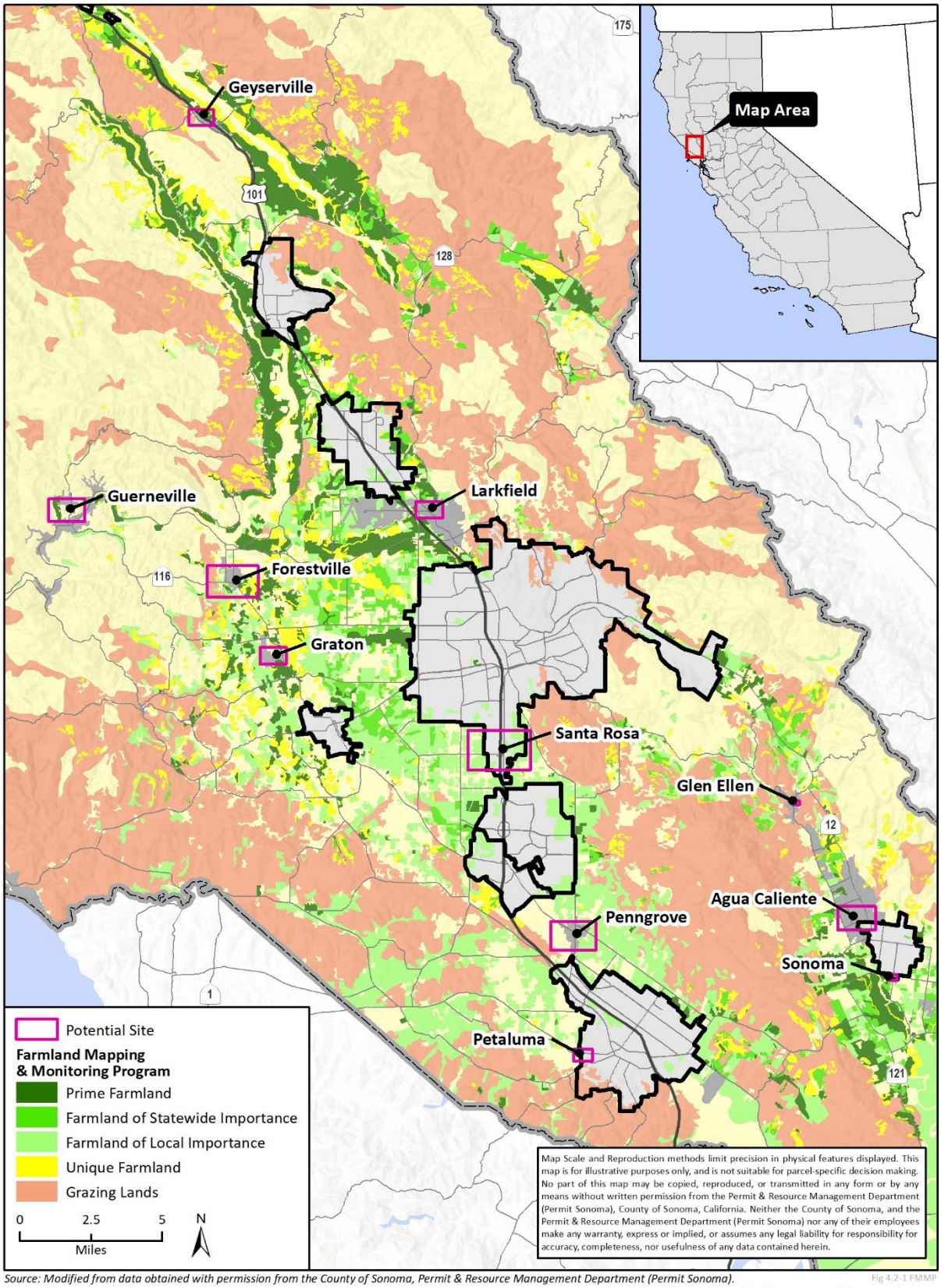
Important Farmlands

The U.S. Soil Conservation Service Important Farmlands Inventory system accounts for lands with agricultural value across the nation. This system divides farmland into five classes based on the productive capability of the land in addition to their soil conditions, as described below. Figure 4.2-1 shows where the farmland types occur in Sonoma County, when they are present.

1. **Prime Farmland.** Prime farmland is land with the best combination of physical and chemical features able to sustain long-term production of agricultural crops. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production during the four years prior to the mapping date (the most recent map update for the region is 2016).
2. **Farmland of Statewide Importance.** Farmland of statewide importance is like Prime Farmland but with minor shortcomings, such as greater slope or less ability to store moisture. Land must have been used for irrigated agricultural production during the four years prior to the mapping date.
3. **Unique Farmland.** Unique farmland is of lesser quality soil and is usually irrigated but may include no irrigated orchards or vineyards. Land must have been cropped at some time during the four years prior to the mapping date.
4. **Farmland of Local Importance.** Farmland of local importance is land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. In some counties, Confined Animal Agriculture facilities are part of Farmland of Local Importance, but they are shown separately.
5. **Grazing Land.** Grazing land is land on which the existing vegetation is suited to livestock grazing. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in grazing activities.

The California Department of Conservation (DOC) maintains a Farmland Mapping and Monitoring Program (FMMP) to quantify economically important farmland and the extent of its conversion. The FMMP Important Farmland Maps account for soil quality and production capacity along with land use information that targets the potential of conversion of these lands to non-agricultural uses. Mapped farmland in Sonoma County accounts for about 56.2 percent of the County land area (DOC 2018, County of Sonoma 2020). The breakdown of farmlands and other lands is provided in Table 4.2-2.

Figure 4.2-1 Important Farmlands in Sonoma County



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri; Department of Conservation.

Table 4.2-2 Sonoma County Farmland Mapping and Monitoring Program Distribution

FMMP Type	Acres	Portion of Total County Land Area
Prime Farmland	29,856.56	2.9%
Farmland of Statewide Importance	17,482.12	1.7%
Farmland of Local Importance	79,913.90	7.8%
Unique Farmland	34,042.05	3.3%
Grazing Land	415,429.16	40.5%
Developed and Other Lands	449,364.98	43.7%
Total County Land Area	**1,026,090.76**	**100.0%***
Total Mapped Farmlands of Importance	**576,723.76**	**56.2%**

Source: County of Sonoma 2020

* Total may not add due to rounding.

The FMMP survey also identifies urban and built-up lands, other land, and water, described as follows.

1. **Urban and Built-up Land.** Urban and built-up land is land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.
2. **Other Land.** Other land includes low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded by urban development and greater than 40 acres is also mapped as Other Land.
3. **Water.** Water is a category encompassing perennial water bodies with an extent of at least 40 acres.

REGIONAL CONVERSION OF FARMLAND

Urban development and the creation of small residential lots in areas normally dedicated to agricultural production threatens to reduce the amount of productive agricultural land in the County. When development extends into areas previously used for farmland, it often results in permanent conversion of agricultural land and reduction of agricultural production. In Sonoma County, conversion has a noteworthy impact when it reduces the capacity for agriculture to contribute to the County's economy. As part of the FMMP, maps are updated every two years to provide land use conversion information for decision-makers to use when planning for the present and future of California's agricultural land resources. The latest inventory concluded that over one million acres were converted between 2016 and 2018. Table 4.2-3 shows the area lost or gained in each land use category. As shown in Table 4.2-3, the net gain of agricultural land was 85 acres between 2016 and 2018.

Table 4.2-3 Sonoma County Farmlands Change by Land Use Category from 2016-2018

Land Use Category	Total Acres Lost	Total Acres Gained	Net Change
Prime Farmland	-195	675	480
Farmland of Statewide Importance	-332	631	299
Unique Farmland	-181	595	414
Farmland of Local Importance	-1,571	894	-677
Important Farmland Subtotal	**-2,279**	**2,795**	**516**
Grazing Land	-1,021	590	-431
Agricultural Land Subtotal	**-3,300**	**3,385**	**85**
Urban and Built-up Land	-377	709	332
Other Land	-721	787	66
Water Area	-504	21	-483
Total Area Inventoried	**4,902**	**4,902**	**0**

Source: DOC 2018

Timber Resources

Most of the timberland resources in Sonoma County are concentrated in the western or coastal area and are therefore addressed in the County's Local Coastal Program (County of Sonoma 2001). Forests provide commercial timber as a renewable resource in Sonoma County, and form a part of the local economy. They also contribute to the scenic quality and sense of place that make Sonoma County an important tourist destination (see Section 4.1, *Aesthetics*). In 2020, 11.4 million board-feet of lumber was harvested in Sonoma County, valued at roughly 4.6 million dollars. This represents a nearly 50 percent decrease in value of timber immediately before cutting over that harvested in 2019 (County of Sonoma 2021).

TIMBERLAND CONVERSION

Timberland is not included in the farmland mapping programs, and the County has different land use policies for agriculture and timber-producing lands. Converting timberland to an agricultural use is distinct from agricultural crop rotation, as once the effort and expense is made to convert timberland to cropland, it is seldom converted back. Most recent timberland-to-agriculture conversion requests were to accommodate vineyards (County of Sonoma 2006).

Project Sites Setting

Many Rezoning Sites are in urbanized areas. Others are located in areas zoned Rural Residential (RR) or Agriculture and Residential (AR) and are either in some degree of agricultural cultivation or are adjacent to lands under cultivation. Mature orchards and evidence of animal husbandry exist on some lots developed with single-family homes. Elsewhere, the adjacent lands are entirely cultivated, mostly with vineyards. Sites with adjacent or surrounding agricultural uses are summarized in Table 4.2-4. Rezoning Sites which are not adjacent to or surrounded by agricultural uses are not listed.

Table 4.2-4 Rezoning Sites with Adjacent/Surrounding Agricultural Uses[†]

Site ID	Location	Adjacent and Nearby Uses
GEY-1	Geyserville	Grazing land, small-scale, residential agriculture
GEY-2, GEY-3, GEY-4	Geyserville	Small-scale, residential agriculture; vineyards; orchards
GUE-2, GUE-3	Guerneville	Residential agriculture (adjacent), larger scale, cultivated fields to the northwest
LAR-7	Larkfield-Wikiup	Vineyards across Old Redwood Highway
FOR-3, FOR-4, FOR-5	Forestville	Residential agriculture to the northwest, extensive vineyards beyond (northeast)
GRA-2	Graton	Residential agriculture with evidence of farm animal occupation*
GRA-4	Graton	Residential agriculture with small fruit orchards east and west of the project site from Hicks Road
GRA-3, GRA-5	Graton	Residential agriculture, vineyards
SAN-1, SAN-3, SAN-5, SAN-10	Santa Rosa	Residential agriculture, open space that could be used for cultivation but does not appear to be so used at the time of this report**
SON-1, SON-2, SON-3, SON-4	Sonoma	Residential agriculture across Broadway with vineyards and cultivated flowers

[†] Sites not listed do not have adjacent or nearby agricultural uses.

* Farm animals may be present as evidenced by cattle fencing and gates, feed and water troughs, and structures compatible with animal raising activities

** Based on review of aerial images available May 2020 (Source: Google Earth 2020)

Effects associated with these activities could include periodic increases in dust and noise, along with pesticide drift if spray application is employed.

4.2.2 Regulatory Setting

a. Federal Regulations

Federal Farmland Protection Act

The Farmland Protection Policy Act (FPPA) is intended to minimize the extent to which federal programs contribute to the unnecessary and irreversible conversion of farmland to nonagricultural uses. It ensures that, to the extent practicable, federal programs are compatible with state and local governments, and private programs and policies that protect farmland. Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are reviewed by a federal agency or with assistance from a federal agency. Under FPPA, farmland includes Prime Farmland, Land of Statewide or Local Importance, and Unique Farmland. Farmland subject to FPPA requirements does not have to be currently used for crop production, but can be forest land, pastureland, cropland, or other land but does not include water bodies or land developed for urban land uses (i.e., residential, commercial, or industrial uses).

The Natural Resource Conservation Service administers the Farmland Protection Program and uses a land evaluation and site assessment system to establish a farmland conversion impact rating score on proposed sites of federally funded or assisted projects. This score is an indicator for the project sponsor to consider alternative sites if the potential adverse impacts on the farmland exceed the recommended allowable level.

Farm Bill Conservation Programs

The Food, Conservation, and Energy Act of 2008 (the 2008 Farm Bill) designated funding for Natural Resource Conservation Service farmland conservation programs, including the Farm and Ranch Lands Protection Program, Wetland Reserve Program, Grassland Reserve Program, Conservation of Private Grazing Land Program, Conservation Reserve Program, Conservation Stewardship Program, Environmental Quality Incentives Program, Agricultural Water Enhancement Program, and Wildlife Habitat Incentives Program.

U.S. Department of Agriculture, U.S. Forest Service

The U.S. Department of Agriculture, U.S. Forest Service is a federal agency that manages public lands in national forests and grasslands. The U.S. Forest Service provides technical and financial assistance to state and private agencies whose purpose it is to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations.

b. State Regulations

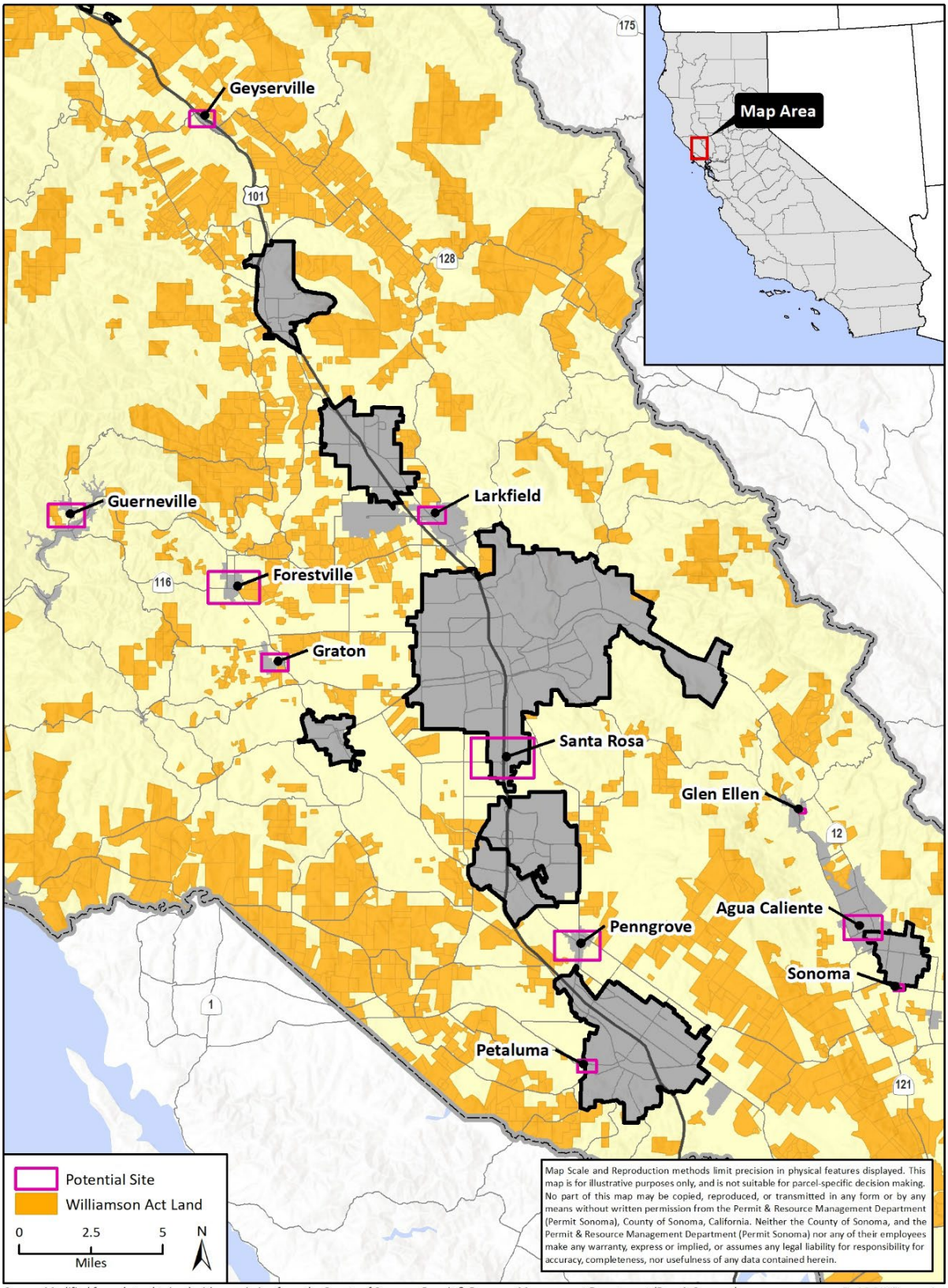
Farmland Mapping and Monitoring Program

Under the Division of Land Resource Protection, the DOC developed the FMMP to monitor the conversion of farmland to and from agricultural use in California. Data is collected at the County level to produce a series of maps identifying eight land use classifications. The program produces a biannual report on the amount of land converted from agricultural to non-agricultural use. The program produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status, with the best quality land being called Prime Farmland, following the federal classifications described above (DOC 2019).

Williamson Act

The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use through a tax incentive model. The intent of the program is to preserve actively productive agricultural lands by discouraging their premature and unnecessary conversion to urban uses. In return, landowners receive property tax assessments that are much lower than normal because they are based upon farming and open space uses as opposed to full market value. Landowners may apply to contract with the County to voluntarily restrict their land to agricultural and compatible uses. Restrictions are enforced through a rolling 10-year term contract. Unless the landowner or the County files a notice of nonrenewal, the 10-year contract is automatically renewed at the beginning of each year. In return for the voluntary restriction, contracted parcels are assessed for property tax purposes at a rate consistent with their actual (agricultural) use, rather than potential market value. Lands under Williamson Act contracts in Sonoma County appear in Figure 4.2-2. The Sonoma County Board of Supervisors has adopted regulations for administration of the County's Williamson Act program.

Figure 4.2-2 Williamson Act Contract Contract Lands in Sonoma County



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
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Land Evaluation and Site Assessment Model

The DOC also employs a land evaluation and site assessment model that incorporates that of the federal model and adds factors to evaluate a given project's size, the soil resource quality at the project site, water resource availability, surrounding a soil resource quality, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. These factors are rated, weighted, and combined into a numeric score that provides the basis for determining a project's potential significance relative to agricultural land conversion.

California Timberland Productivity Act

To assure that timber resource lands are available in the future, the California Timberland Productivity Act of 1982 (California Government Code, Section 65302) requires the County to designate timberlands in the General Plan and to establish "Timberland Production" zones where uses are limited to timber production.

Forest Practice Act

The Forest Practice Act of 1973 ensures logging is done in a manner that preserves and protects fish, wildlife, forests, and streams in the state. The California Department of Forestry and Fire Protection (CAL FIRE) implements and enforces this and associated rules that protect these resources.

CAL FIRE ensures that private landowners abide by these laws when harvesting trees. Although there are specific exemptions in some cases, compliance with the Forest Practice Act and Forest Practice Rules adopted by the Board of Forestry apply to all commercial harvesting operations for landowners of small parcels, to ranchers owning hundreds of acres, and large timber companies with thousands of acres. The Timber Harvesting Plan is the environmental review document landowners present to CAL FIRE, and it outlines what will be harvested, how it will be harvested, and the steps that will be taken to prevent damage to the environment.

c. Local Regulations

Agricultural Preserve and Open Space District

The Agricultural Preservation and Open Space District is a special district aimed at to protect agricultural, open space, natural resource, and recreational lands that is funded by a 0.25 percent sales tax.

As of 2020, the Sonoma County Agricultural Preservation and Open Space District has preserved 32,500 acres of agricultural lands via conservation easements throughout (see Figure 4.2-2).

Sonoma County Local Agency Formation Commission (Agricultural Lands Policy)

The Sonoma County Local Agency Formation Commission (LAFCO) is established under the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code Section 56000, et seq.). The LAFCO's function is to "review and approve with or without amendment, wholly, partially, or conditionally, or disapprove proposals for changes of organization or reorganization, consistent with written policies, procedures, and guidelines adopted by the commission." (Government Code Section 56375). This gives LAFCO exclusive power to consider city incorporations, city annexations, and the creation of or addition to special districts. Sonoma LAFCO's Agricultural Lands Policy requires that, in addition considering the policies in Government Code Section 56377, the

Commission shall conform to the following policies in reviewing and approving or disapproving proposals that may result in the conversion of agricultural land to non-agricultural uses:

1. Agricultural significance of the subject territory and adjacent areas relative to other agricultural lands in the region
2. Use of the subject territory and adjacent areas
3. Whether public facilities for proposed development would be a) sized or situated to facilitate conversion of adjacent or nearby agricultural land, or b) extended through agricultural lands that lie between the project site and existing facilities
4. Whether uses incompatible with adjacent agricultural uses are expected to result from the proposal and whether natural or man-made barriers would buffer adjacent or nearby agricultural lands from the effects of proposed development or other incompatible uses
5. Whether the subject territory is located within the sphere of influence of a city or district providing sewer and/or water service or in an "Urban Service Area" designation of the Sonoma County General Plan
6. Provisions of applicable general plan open space and land use elements, growth management policies, or other statutory provisions designed to protect agriculture

The Sonoma County LAFCO is mandated to discourage development that would likely convert to urban uses those lands identified by the County General Plan as suitable for long-term agricultural or open space use or identified by the Sonoma County Agricultural Preservation and Open Space District Acquisition Plan as a priority for acquisition or protection in cooperation with willing landowners (Sonoma LAFCO 2013).

Sonoma County General Plan

The Sonoma County General Plan Agricultural Resources Element promotes and protects local agriculture and forestry. The Agricultural Resources Element defines agriculture as an industry that produces and processes food, fiber, and plant materials, or includes the raising and maintaining of farm animals. The element establishes policies to ensure the stability and productivity of the County's agricultural lands and industries and provides guidelines for decisions in agricultural areas. Goals, objectives, and polices that apply to the proposed project are as follows.

Goal AR-2: Maintain for the timeframe of this [General Plan] agricultural production on farmlands at the edges but beyond the Urban Service Areas, to minimize the influence of speculative land transactions on the price of farmland and to provide incentives for long term agricultural use.

Objective AR-2.1: Limit intrusion of urban development into agricultural areas.

Objective AR-2.2: Maintain the Urban Service Boundaries to protect agricultural lands at the urban fringe for continued agricultural production.

Objective AR-2.3: Limit extension of urban services such as sewer beyond the Urban Service Boundaries.

Objective AR-2.4: Reduce economic pressure for conversion of agricultural land to non-agricultural use.

Policy AR-2a: Apply agricultural land use categories based on the capability of the land to produce agricultural products. Unless allowed by the Public Facilities and Services Element, limit extension of sewer service to these lands except by out-of-district agreement to solve a health and safety problem.

Policy AR-2b: Prepare a written report to the Local Agency Formation Commission (LAFCO) regarding the consistency with the General Plan of any proposed changes in the sphere of influence or other urban boundaries for governmental entities that provide water or sewer services.

Policy AR-2c: Encourage LAFCO to consider the impacts of annexations on nearby agricultural lands, and to avoid expansion of spheres of influence or annexations onto agricultural lands outside of the designated Urban Service Areas.

Policy AR-2d: Use voluntary purchase or voluntary transfer of development rights programs to limit intrusion of residential development into agricultural lands. If these programs are used, amendments of the Land Use Map or rezoning shall not be used to lower density in anticipation of conferring transfer or purchase rights.

Goal AR-3: Maintain the maximum amount of land in parcel sizes that a farmer would be willing to lease or buy for agricultural purposes.

Objective AR-3.1: Avoid the conversion of agricultural lands to residential or nonagricultural commercial uses.

Objective AR-3.2: Maintain, in those agricultural land use categories where small parcels may be permitted, the largest land area for agricultural use. Limit the number of clustered lots in any one area to avoid the potential conflicts associated with residential intrusion.

Policy AR-3a: In the "Land Intensive Agriculture" category, new parcels shall not be created which are smaller than 20 acres.

Policy AR-3b: In considering subdivision of lands within "Land Extensive Agriculture" areas except those lands under Williamson Act contract, one-half or three of the permitted residential lots (whichever is greater), may be clustered. These clustered parcels may be as small as one one-half acres but no larger than ten acres. No future subdivision of these small parcels shall be permitted. All other parcels created in this category shall have a minimum lot size at least as large as the maximum density specified by the Land Use Map or Policy AR-8c, whichever is more restrictive. Lands subject to a Williamson Act contract are restricted from incompatible development under the County's rules for administration of Agricultural Preserves, as amended from time to time.

Policy AR-3c: Where clustered subdivision is permitted, separate clusters on one site from those on another site unless it is clearly demonstrated that the resulting lots will not create the appearance of, or conflicts associated with, residential intrusion. Any subdivision which proposes to cluster parcels of 10 acres or less shall locate those lots around existing residences on the parcel being subdivided. The intent of this policy is to minimize the impact of residential parcels on adjacent agricultural operations.

Policy AR-3d: Wherever practical, where clustered subdivision is permitted, use natural features such as ridge tops, creeks, and substantial tree stands to separate the small parcels from the farming areas.

Policy AR-3e: Where clustered subdivision is permitted, to the extent allowed by law, place an agricultural easement in perpetuity on the residual farming parcel(s) at the time that the subdivision occurs. The easement shall be conveyed to the County or other appropriate nonprofit organizations.

Policy AR-3f: Avoid amendments of the land use map from an agricultural to a non-agricultural use category for the purpose of allowing increased residential density which may conflict with agricultural production.

Policy AR-3g: Develop regulations restricting the size and extent of non-agricultural development on agricultural lands to be included in the Development Code.

Goal AR-4: Allow farmers to manage their operations in an efficient, economic manner with minimal conflict with nonagricultural uses.

Objective AR-3.1: Apply agricultural land use categories only to areas or parcels capable of the commercial production of food, fiber, and plant material, or the raising and maintaining of farm animals including horses, donkeys, mules, and similar livestock. Establish agricultural production as the highest priority use in these areas or parcels. The following policies are intended to apply primarily to lands designated within agricultural land use categories.

Policy AR-4a: The primary use of any parcel within the three agricultural land use categories shall be agricultural production and related processing, support services, and visitor serving uses. Residential uses in these areas shall recognize that the primary use of the land may create traffic and agricultural nuisance situations, such as flies, noise, odors, and spraying of chemicals.

Policy AR-4b: Apply agricultural zoning districts only to lands in agricultural land use categories to implement the policies and provisions of the Agricultural Resources Element.

Policy AR-4c: Protect agricultural operations by establishing a buffer between an agricultural land use and residential interface. Buffers shall generally be defined as a physical separation of 100 to 200 feet and/or may be a topographic feature, a substantial tree stand, water course or similar feature. In some circumstances a landscaped berm may provide the buffer. The buffer shall occur on the parcel for which a permit is sought and shall favor protection of the maximum amount of farmable land.

Policy AR-4d: Apply the provisions of the Right to Farm Ordinance to all lands designated within agricultural land use categories.

Policy AR-4e: Recognize provisions of existing State nuisance law (Government Code Section 3482.5).

Policy AR-4f: Anticipated conflicts between a proposed new agricultural use and existing agricultural activities shall be mitigated by the newer use or application.

Goal AR-7: Support efficient management of local agricultural production activities by the development of adequate amounts of farm worker and farm family housing in agricultural areas.

Objective AR-7.1: Encourage farm operators to provide sufficient housing in addition to housing permitted by applicable density for permanent and seasonal agricultural employees and for family members to maintain agricultural production activities.

Objective AR-7.2: Locate agricultural employee housing where it promotes efficiency of the farming operation and has minimal impact on productive farmland.

Objective AR-7.3: Assist nonprofit organizations or agencies in their efforts to establish a program to provide safe and adequate housing for farm workers.

Objective AR-7.4: Permit a limited number of farm family housing units in addition to the number of dwellings allowed by the density.

Policy AR-7a: Permit permanent employee housing in addition to permitted density according to the needs of a particular sector of the agricultural industry. Express in the Development Code specific criteria to establish the number of agricultural employee units.

Policy AR-7d: Assist the Community Development Commission and other appropriate agencies in developing funding and programs for farm worker housing.

The General Plan Land Use Element provides the distribution, location, and extent of uses of land for housing, business, industry, open space, agriculture, natural resources, recreation and enjoyment of scenic beauty, education, public buildings and grounds, solid and liquid waste disposal facilities, and other uses. For each appropriate land use category, it includes standards for population density and building intensity. Generally, the element includes goals to protect agricultural resources and to maintain opportunities for diverse rural and urban residential environments, among others. Rezoning Sites occur in the Russian River Area, Santa Rosa and Environs, Sebastopol and Environs, Rohnert Park-Cotati and Environs, and Petaluma and Environs. The element addresses growth patterns that conserve agricultural and resource lands and preserves the rural character of the County. Those objectives and policies that support land use goals related to agriculture and timberland follow.

Goal LU-9: Protect lands currently in agricultural production and lands with soils and other characteristics that make them potentially suitable for agricultural use. Retain large parcel sizes and avoid incompatible non-agricultural uses.

Objective LU-9.1: Avoid conversion of lands currently used for agricultural production to non-agricultural use.

Objective LU-9.2: Retain large parcels in agricultural production areas and avoid new parcels less than 20 acres in the "Land Intensive Agriculture" category.

Objective LU-9.3: Agricultural lands not currently used for farming, but which have soils or other characteristics that make them suitable for farming shall not be developed in a way that would preclude future agricultural use.

Objective LU-9.4: Discourage uses in agricultural areas that are not compatible with long term agricultural production.

Policy LU-9a: Limit extensions of sewer service into any agricultural production area to parcels with a health or safety problem. Out-of-service-area agreements are the preferred method of extending service in such cases.

Policy LU-9b: Apply a base zoning district of agriculture for any land area designated on the Land Use Map for agriculture. Other overlay zoning districts may be applied where allowed by the agricultural land use category.

Policy LU-9c: Use rezonings, easements and other methods to ensure that development on agricultural lands does not exceed the permitted density except where allowed by the policies of the Agricultural Resources Element.

Policy LU-9d: Deny General Plan amendments that convert lands outside of designated Urban Service Areas with Class I, II, or III soils (USDA) to an urban or rural residential, commercial, industrial, or public/quasi-public category unless all of the following criteria, in addition to the designation criteria for the applicable land use category, are met:

(1) The land use proposed for conversion is not in an agricultural production area and will not adversely affect agricultural operations

(2) The supply of vacant or underutilized potential land for the requested use is insufficient to meet projected demand

(3) No areas with other soil classes are available for non-resource uses in the planning area

(4) An overriding public benefit will result from the proposed use

Sonoma County Zoning Code

Sonoma County Zoning Regulations include three agricultural use categories: Land Intensive Agriculture (LIA), Land Extensive Agriculture (LEA), and Diverse Agriculture (DA). Each category permits the full range of agricultural uses. The categories differ primarily in the types and intensities of agricultural support services, visitor-serving uses, and residential densities. In addition, the County also has an Agriculture and Residential District (AR) which allows for raising of crops and farm animals in areas designated primarily for rural residential uses. The County's Timberland Production (TP) Zone identifies land consistent with the Timberland Productivity Act. Most timberland and forest land not zoned TP is zoned Resources and Rural Development (RRD), which allows land management for commercial production, and timber management for noncommercial purposes including harvesting and incidental milling, subject to the requirements of CAL FIRE.

RIGHT TO FARM ORDINANCE (SONOMA COUNTY CODE CHAPTER 30, ARTICLE II)

Sonoma County's Right to Farm ordinance was originally adopted in 1988 and revised in 1999 to include stronger disclosure requirements. The basic intention of the ordinance is to provide public policy support for maintaining the viability of agriculture in Sonoma County. Two of the major features of the Right to Farm ordinance are the farmers' right to conduct agricultural operations, and that legal, properly conducted agricultural operations will not be considered a nuisance. The protections afforded by the ordinance apply only to agricultural operations on land designated as LIA, LEA, or DA (Sonoma County Code Chapter 30, Article II).

VINEYARD & ORCHARD DEVELOPMENT AND AGRICULTURAL GRADING AND DRAINING (VESCO)

Sonoma County's VESCO ordinance (codified as Sonoma County Code Chapter 36) regulates new vineyard and orchard development, vineyard and orchard replanting, agricultural grading and draining within the Unincorporated County. It sets ministerial standards for specific activities related to erosion, draining, and protection of water resources. VESCO is designed to protect water quality and conserve soil through the use of riparian setbacks, maximum slope allowed for vineyard planting, and other requirements (Sonoma County Code Chapter 36, as amended by Ord. No. 6331, Exhibit A, December 15, 2020).

AGRICULTURAL SETBACKS

The County Zoning Code establishes agricultural setbacks that provide a buffer between agricultural operations on lands designated agricultural in the existing General Plan and adjacent non-agricultural land uses. Generally, the buffer is defined as a physical separation of 100 to 200 feet on the development side (Sonoma County Code Section 26-88-040(f).

4.2.3 Impact Analysis

a. Significance Thresholds and Methodology

Agricultural impacts were evaluated based upon review of DOC farmland classifications, regulatory requirements that apply to the various agricultural lands within the county, and the potential of future development to create an agricultural/urban interface. For analysis purposes, "important farmlands" include the following DOC classifications: Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. Significance criteria found in *CEQA Guidelines* Appendix G provide the means to identify where potentially significant impacts might occur. Impacts to agriculture and forestry resources would be significant if implementation of the project would:

1) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to nonagricultural use
2) Conflict with existing zoning for agricultural use, or a Williamson Act contract
3) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production
4) Result in the loss of forest land or conversion of forest land to non-forest use
5) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use

b. Project Impacts and Mitigation Measures

Threshold:	Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
Threshold:	Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

Impact AG-1 NONE OF THE REZONING SITES OCCUR ON LAND DESIGNATED AS PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE. THEREFORE, DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT CONVERT THESE TYPES OF LANDS TO NON-AGRICULTURAL USE. NONE OF THE LANDS ARE UNDER WILLIAMSON ACT CONTRACT AND THUS, LANDS UNDER THIS PROTECTION WOULD NOT BE CONVERTED TO NON-AGRICULTURAL USE. NO IMPACT WOULD OCCUR.

All Rezoning Sites occur in County-designated Urban Service Areas, defined in the 2020 General Plan as geographical areas within the urban growth boundary of a city that are designated for urban development. Many of the identified parcels and their adjacent uses are currently zoned for rural residential or limited density, which in some cases means agricultural cultivation is currently underway; nonetheless, none of these lands are considered prime or important farmlands, as designated by the FMMP mapping program. The Rezoning Sites were selected out of dozens of possible sites in part specifically because rezoning them for higher density residential development would not convert productive, prime agricultural lands. Furthermore, none of these sites are under Williamson Act contracts and thus the protections that program affords valuable agricultural lands would not be violated by development facilitated by the project. There would be no impact.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impact would occur, and mitigation is not required.

Threshold:	Would the project result in the loss of forest land or conversion of forest land to non-forest use?
Threshold:	Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Impact AG-2 None of the Rezoning Sites are situated in areas zoned for timberland production (TPZ) and, therefore, development facilitated by the project would not conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production. Development facilitated by the project would not result in the loss of forest land or conversion of forest land to non-forest use. There would be no impact.

The Rezoning Sites do not include existing zoning for timberland, forest land, or timberland zoned Timberland Production. None of the Rezoning Sites are zoned TP or RRD, nor are lands adjacent to the Rezoning Sites zoned TP. Accordingly, development facilitated by the project would not conflict with existing zoning for, or cause rezoning of, land zoned as forest land, timberland, or Timberland Production. The location of the Rezoning Sites in urban service areas together with comparatively small parcel sizes mean that the sites are not timberland under Public Resources Code Section 4526 because they are not available for growing a crop of trees of commercial species. Therefore, no impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impacts would occur, and mitigation is not required.

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

Impact AG-3 The project would rezone some sites that are adjacent to agricultural uses, and may indirectly impact those uses. Implementation of Mitigation Measure AG-1 would reduce this impact to less than significant.

Several Rezoning Sites are located adjacent to agriculturally zoned properties, listed in Table 4.2-4. The Right to Farm ordinance and the provisions for maintaining agricultural land in the 2030 General Plan support the continued use of these lands for agricultural production to both retain the agricultural character of the County and to stabilize agricultural uses at the urban fringe (County of Sonoma 2016). While the General Plan anticipates the conversion of the Rezoning Sites from their current zoning to one that supports increased residential density, when the site is adjacent to ongoing cultivation conflicts may occur. It is possible that adjacent agricultural uses could continue to be cultivated with associated activities including plowing and mowing, applying pesticides, and using farm equipment. Potential effects might include those arising from the use of farm equipment (e.g., noise, dust) and drift from periodic pesticide application. Furthermore, during harvest seasons, there could be increased traffic and noise in the vicinity. All of this has the potential to pressure adjacent uses to curtail or cease agricultural production if the effects of their ongoing cultivation

become a nuisance or produce adverse effects (e.g., poor air quality) that impact people living next to or nearby the agricultural lands.

While these potential effects are purely speculative, it is possible the implementing high-density residential development next to agricultural uses could change the existing environment by exerting pressure to make it more hospitable to residential occupation. Thus, changes to the existing environment might arise through pressure to reduce agricultural activities in such a way that productivity is reduced, and farmland becomes more valuable if it is converted to residential or commercial uses.

Rezoning Sites with larger, adjacent agricultural uses that fall under the Right to Farm ordinance and thus, could be in conflict include the following:

1. GEY-2, GEY-3, GEY-4
2. GUE-2, GUE-3
3. LAR-7
4. FOR-3, FOR-4, FOR-5
5. GRA-3, GRA-5
6. SAN-1, SAN-3, SAN-5, SAN-10
7. SON-1, SON-2, SON-3, SON-4

Changes to the environment that result from development of these sites could have a significant impact to adjacent lands, as described above. However, most of the sites listed above would be subject to the agricultural protection buffer described in 26-88-040(f) of the County Zoning Code, which states, "generally, buffers are defined as a physical separation of 100 feet to 200 feet," depending on the how close the residential uses are. In addition, data show that buffers such as vegetative barriers, field borders, riparian buffers, contour grass strips, and herbaceous wind barriers, reduce the movement of sediment, nutrients, and pesticides within farm fields and from farm fields to adjacent properties. Buffers also reduce noise and odor that may otherwise impact adjacent non-agriculture uses (USDA 2020).

Mitigation Measure AG-1 would require buffers to be established in order to reduce impacts to agricultural uses adjacent to Rezoning Sites.

Mitigation Measure

MITIGATION MEASURE AG-1 INTERIM AGRICULTURAL BUFFERS

Development facilitated by the project adjacent to active agricultural operations shall provide fencing and a minimum buffer of 200 feet to the agricultural operations, consistent with 26-88-040(f) of the Sonoma County Zoning Code. If this distance is not practical due to project design or features, a minimum 100-foot buffer is acceptable if it complies with all of the requirements for a reduced buffer and a vegetative screen is provided as specified in Section 26-88-040(f).

Significance After Mitigation

Impacts would be less than significant with mitigation.

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4.3 Air Quality

This section analyzes the potential air quality impacts associated with implementation of the proposed project, including from conflicts with applicable air quality plans, exceedance of air quality standards from criteria pollutant emissions, exposure of sensitive receptors to substantial pollutant concentrations, and odor emissions. The analysis in this section is based in part on modeling using the California Emissions Estimator Model (CalEEMod); modeling outputs are included in Appendix AQ of this document.

4.3.1 Setting

a. Existing Air Quality Setting

Local Climate and Meteorology

The southern portion of Sonoma County (from approximately Windsor to the southern County border) is in the San Francisco Bay Area Air Basin (SFBAAB), which is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). This includes the Rezoning Sites near Larkfield, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, and Sonoma, as shown in Figure 2-1. The northern portion of Sonoma County (from approximately north of Windsor to the northern County border) is in the North Coast Air Basin (NCAB), which is under the jurisdiction of the Northern Sonoma County Air Pollution Control District (NSCAPCD). This includes the Geyserville, Forestville, and Guerneville sites as shown in Figure 2-1. Air quality in these basins is affected by the region's emission sources and by natural factors. Topography, wind speed and direction, and air temperature gradient all influence air quality. The basins are affected by a Mediterranean climate, with warm, dry summers and cool, damp winters.

Stationary and mobile sources generate air pollutant emissions in the basins. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and are generated by residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products, among other things. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

The portion of Sonoma County in the SFBAAB typically has higher concentrations of pollutants due to its higher population density and proximity to the Bay Area's major metropolitan areas. The part of Sonoma County in the NCAB has lower pollutant concentrations and typically good air quality due to its lower population density, proximity to the coast, and large mountain ranges.

Air Quality Standards

The federal and state governments have established ambient air quality standards for the protection of public health. The United States Environmental Protection Agency (USEPA) is the federal agency designated to administer air quality regulation, while the California Air Resources

Board (CARB) is the State equivalent in the California Environmental Protection Agency (CalEPA). The BAAQMD and NCSAPCD provide local management of air quality in the County. CARB has established air quality standards and is responsible for the control of mobile emission sources, while the BAAQMD and NCSAPCD are responsible for enforcing standards and regulating stationary sources.

The USEPA has set primary national ambient air quality standards (NAAQS) for ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter with an aerodynamic diameter equal to or less than 10 microns (PM_{10}), fine particulate matter with an aerodynamic diameter equal to or less than 2.5 microns ($PM_{2.5}$), and lead. Primary standards are those levels of air quality deemed necessary, with an adequate margin of safety, to protect public health. In addition, California has established health-based ambient air quality standards for these and other pollutants, some of which are more stringent than the federal standards. Table 4.3-1 lists the current federal and State standards for regulated pollutants.

Table 4.3-1 Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	Federal Primary Standards	California Standard
Ozone	1-Hour	–	0.09 ppm
	8-Hour	0.070 ppm	0.070 ppm
Carbon Monoxide	8-Hour	9.0 ppm	9.0 ppm
	1-Hour	35.0 ppm	20.0 ppm
Nitrogen Dioxide	Annual	0.053 ppm	0.030 ppm
	1-Hour	0.100 ppm	0.18 ppm
Sulfur Dioxide	Annual	–	–
	24-Hour	–	0.04 ppm
	1-Hour	0.075 ppm	0.25 ppm
PM_{10}	Annual	–	20 µg/m^3
	24-Hour	150 µg/m^3	50 µg/m^3
$PM_{2.5}$	Annual	12 µg/m^3	12 µg/m^3
	24-Hour	35 µg/m^3	–
Lead	30-Day Average	–	1.5 µg/m^3
	3-Month Average	0.15 µg/m^3	–

ppm = parts per million
µg/m^3 = micrograms per cubic meter
Source: CARB 2016

As local air quality management agencies, the BAAQMD and NSCAPCD must monitor air pollutant levels to ensure that State and federal air quality standards are met and, if they are not met, to develop strategies to meet them. Depending on whether standards are met or exceeded, a local air basin is classified as in "attainment" or "non-attainment." The SFBAAB is in non-attainment for the federal standards for ozone and $PM_{2.5}$ and in non-attainment for the State standard for ozone, $PM_{2.5}$, and PM_{10}. The NCAB is in attainment for all standards.

Air Quality Pollutants of Primary Concern

The federal and State clean air acts mandate the control and reduction of certain air pollutants. Under these laws, USEPA and CARB have established ambient air quality standards for certain criteria pollutants. Ambient air pollutant concentrations are affected by the rates and distributions of corresponding air pollutant emissions, and by the climate and topographic influences discussed above. Proximity to major sources is the primary determinant of concentrations of non-reactive pollutants, such as CO and suspended particulate matter. Ambient CO levels usually follow the spatial and temporal distributions of vehicular traffic. A discussion of each primary criterion pollutant is provided below.

OZONE

Ozone is produced by a photochemical reaction (i.e., triggered by sunlight) between nitrogen oxides (NO_X) and reactive organic gases (ROG).[1] NO_X is formed during the combustion of fuels, while ROG is formed during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, it mostly occurs in substantial concentrations between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

CARBON MONOXIDE

CO is an odorless, colorless gas and causes health problems such as fatigue, headache, confusion, and dizziness. The incomplete combustion of petroleum fuels by on-road vehicles and at power plants is a major cause of CO, which is also produced during the winter from wood stoves and fireplaces. CO tends to dissipate rapidly into the atmosphere; consequently, violations of the State CO standards are associated generally with major roadway intersections during peak-hour traffic conditions.

Localized CO "hotspots" can occur at intersections with heavy peak-hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high that the local CO concentration exceeds the NAAQS of 35.0 ppm or the CAAQS of 20.0 ppm.

NITROGEN DIOXIDE

NO_2 is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. Nitric oxide is the principal form of nitrogen oxide produced by combustion, but nitric oxide reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. Nitrogen dioxide is an acute irritant. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis may occur in young children at concentrations below 0.3 ppm. Nitrogen dioxide absorbs blue light and causes a reddish-brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM_{10} and acid rain.

[1] CARB defines VOC and ROG similarly as, "any compound of carbon excluding CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions (CARB 2009). For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions and the term ROG is used in this report.[1] CARB defines VOC and ROG similarly as, "any compound of carbon excluding CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions (CARB 2009). For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions and the term ROG is used in this report.

SUSPENDED PARTICULATE MATTER

PM_{10} is particulate matter measuring no more than 10 microns in diameter; $PM_{2.5}$ is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates, and sulfates. Both PM_{10} and $PM_{2.5}$ are by-products of fuel combustion and wind erosion of soil and unpaved roads and are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with the small particulates (those between 2.5 and 10 microns in diameter) and fine particulates (those 2.5 microns and below) can be very different.

The small particulates generally come from windblown dust and dust kicked up by mobile sources. The fine particulates are generally associated with combustion processes, and form in the atmosphere as a secondary pollutant through chemical reactions. Fine particulate matter is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

TOXIC AIR CONTAMINANTS

The California Health and Safety Code defines a toxic air contaminant (TAC) as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." Most of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being diesel particulate matter (DPM) from diesel-fueled engines. According to CARB, diesel engine emissions are believed to be responsible for about 70 percent of California's estimated known cancer risk attributable to TACs and they make up about 8 percent of outdoor $PM_{2.5}$ (CARB 2020).

LEAD

Lead is a metal found in the environment and in manufacturing products. Historically, the major sources of lead emissions have been mobile and industrial sources. In the early 1970s, the USEPA set national regulations to gradually reduce the lead content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The USEPA completed the ban prohibiting the use of leaded gasoline in highway vehicles in December 1995. As a result of the USEPA's regulatory efforts to remove lead from gasoline, atmospheric lead concentrations have declined substantially over the past several decades. The most dramatic reductions in lead emissions occurred prior to 1990 due to the removal of lead from gasoline sold for most highway vehicles. Because of phasing out leaded gasoline, metal processing is now the primary source of lead emissions. The highest level of lead in the air is found generally near lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers.

Current Air Quality

There are two air quality monitoring stations currently in operation in Sonoma County: the Healdsburg-Municipal Airport station, located in the NSCAPCD, and the Sebastopol-103 Morris Street station, located in the BAAQMD. The Healdsburg-Municipal Airport station only monitors ozone; the Sebastopol-103 Morris Street station monitors ozone, particulate matter, and NO_2.

Table 4.3-2 indicates the number of days that each of the air quality standards have been exceeded at the stations during the monitoring period from 2018 through 2020.

Table 4.3-2 Ambient Air Quality at Sonoma County Monitoring Stations

Pollutant	2018	2019	2020
Sebastopol-103 Morris Street Station			
8-Hour Ozone (ppm), maximum	0.053	0.059	0.058
Number of days of State exceedances (>0.070)	0	0	0
Number of days of federal exceedances (>0.070)	0	0	0
1-hour ozone (ppm), maximum	0.071	0.070	0.068
Number of days of State exceedances (>0.09 ppm)	0	0	0
Number of days of federal exceedances (>0.112 ppm)	0	0	0
Nitrogen dioxide (ppb) – 1-Hour Maximum	65.1	31.9	36.3
Number of days of State exceedances (>0.18 ppm)	0	0	0
Number of days of federal exceedances (0.10 ppm)	0	0	0
Particulate matter <2.5 microns, μg/m^3, 24-hour maximum	175.3	28.0	124.3
Number of days above federal standard (>35 μg/m^3)	13	0	7
Healdsburg-Municipal Airport Station			
8-hour ozone (ppm), 8-hour maximum	0.061	0.061	0.040
Number of days of State exceedances (>0.070)	0	0	0
Number of days of federal exceedances (>0.070)	0	0	0
Ozone (ppm), 1-hour maximum	0.075	0.066	0.044
Number of days of State exceedances (>0.09 ppm)	0	0	0
Number of days of federal exceedances (>0.112 ppm)	0	0	0

Source: CARB 2022

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient to protect public health and welfare, with a margin of safety. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14, the elderly over 65, persons engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases. Therefore, most of the sensitive receptor locations are schools, hospitals, senior living centers, and residences.

4.3.2 Regulatory Setting

a. Federal

Federal Clean Air Act

The USEPA is charged with implementing national air quality programs. USEPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), passed in 1963 by the U.S. Congress and amended several times. The 1970 federal CAA amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including non-attainment requirements for areas not

meeting NAAQS and the Prevention of Significant Deterioration program. The 1990 federal CAA amendments represent the latest in a series of federal efforts to regulate air quality in the United States.

National Ambient Air Quality Standards

The federal CAA requires USEPA to establish primary and secondary NAAQS for several criteria air pollutants. The air pollutants for which standards have been established are considered the most prevalent air pollutants known to be hazardous to human health. NAAQS have been established for ozone, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and Pb.

b. State

California Clean Air Act

The California CAA, signed into law in 1988, requires all areas of the State to achieve and maintain the CAAQS by the earliest practical date. CARB is the State air pollution control agency and is a part of CalEPA. CARB is the agency responsible for coordination and oversight of State and local air pollution control programs in California, and for implementing the requirements of the California CAA. CARB overseas local district compliance with federal and California laws, approves local air quality plans, submits the State implementation plans to the USEPA, monitors air quality, determines and updates area designations and maps, and sets emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

California Ambient Air Quality Standards

The California CAA requires CARB to establish ambient air quality standards for California, known as CAAQS. Similar to the NAAQS, CAAQS have been established for criteria pollutants and standards are established for vinyl chloride, hydrogen sulfide, sulfates, and visibility-reducing particulates. In general, the CAAQS are more stringent than the NAAQS on criteria pollutants. The California CAA requires all local air districts to endeavor to achieve and maintain the CAAQS by the earliest practical date. The California CAA specifies that local air districts focus attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.

California Air Quality Control Plan (State Implementation Plan)

A State Implementation Plan (SIP) is a document prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain federal standards. The SIP for California is administered by CARB, which has overall responsibility for Statewide air quality maintenance and air pollution prevention. California's SIP incorporates individual federal attainment plans for regional air districts—an air district prepares their federal attainment plan, which is sent to CARB to be approved and incorporated into the California SIP. Federal attainment plans include the technical foundation for understanding air quality (e.g., emission inventories and air quality monitoring), control measures and strategies, and enforcement mechanisms.

Areas designated nonattainment must develop air quality plans and regulations to achieve standards by specified dates, depending on the severity of the exceedances. For much of the country, implementation of federal motor vehicle standards and compliance with federal permitting requirements for industrial sources are adequate to attain air quality standards on schedule. For

many areas of California, however, additional State and local regulation is required to achieve the standards.

c. Local

Bay Area Air Quality Management District

The BAAQMD is the agency primarily responsible for assuring national and State ambient air quality standards are attained and maintained in the SFBAAB portion of the County. The BAAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, and conducting public education campaigns, as well as many other activities.

BAY AREA CLEAN AIR PLAN

BAAQMD adopted the *Bay Area Clean Air Plan: Spare the Air, Cool the Climate (Bay Area Clean Air Plan)* on April 19, 2017 as an update to the 2010 Clean Air Plan. The 2017 Clean Air Plan, which focuses on protecting public health and the climate, defines an integrated, multi-pollutant control strategy that includes feasible measures to reduce emissions for four categories: ground-level ozone and its precursors, ROG and NO_X; PM (primarily $PM_{2.5}$, and precursors to secondary $PM_{2.5}$); TACs, and greenhouse gas emissions. The control measures are categorized based on the economic sector framework and include stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, and water. To protect public health, the control strategy will decrease population exposure to PM and TACs in communities that are most impacted by air pollution with the goal of eliminating disparities in exposure to air pollution between communities. The control strategy will also protect the climate by reducing greenhouse gas emissions and developing a long-range vision of how the Bay Area could look and function in a year 2050 post-carbon economy (BAAQMD 2017a).

Northern Sonoma County Air Pollution Control District

NSCAPCD is the agency primarily responsible for attaining and maintaining the NAAQS and CAAQS in the NCAB portion of the County. NSCAPCD is responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, and monitoring ambient air quality and meteorological conditions. NCAB is in attainment for all federal ambient air quality standards, and, as such, the NSCAPCD is not required to prepare or implement an air quality plan.

Specific NSCAPCD rules applicable to development under the project would include:

1. **Rule 400 – General Limitations.** The general limitations rule ensures that a person may not create a public nuisance by discharging quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have an natural tendency to cause injury or damage to business or property. NSCAPCD has established a nuisance rule to address odor issues. Rule 400 states that air contaminants will not be discharged in quantities sufficient to constitute a public nuisance to any considerable number of persons or the public or that would endanger the comfort or

repose of any person or the public. Odors would be considered a nuisance by NSCAPCD if a complaint is received from a significant number of people and the odor issue is verified upon inspection.

2. **Rule 410 – Visible Emissions.** The visible emissions rule ensures that a person may not create a public nuisance by discharging into the atmosphere from any source whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated as No. 2 on the Ringlemann Chart, as published by the United States Bureau of Mines or of such opacity as to obscure an observer's view to a degree equal to or greater than Ringlemann 2 or 40 percent opacity.
3. **Rule 420 – Particulate Matter.** The particulate matter rule ensures that no person may discharge particulate matter into the atmosphere causing a public nuisance or causing an exceedance of State or national ambient air quality standards. Various emission limits are defined in the rule governing particulate emissions from different sectors of industry.
4. **Rule 430 – Fugitive Dust Emissions.** The fugitive dust rule ensures that the handling, transporting, or open storage of materials in such a manner which allows or may allow unnecessary amounts of particulate matter to become airborne, shall not be permitted. The rule also defines a set of reasonable precautions designed to aid in preventing violation the rule.
    a. **Regulation II – Open Burning.** This regulation prohibits the use of open outdoor fires within the Basin with certain exemptions as outlined in the regulation.
    b. **Regulation IV – Control Measure for Wood-Fired Appliance Emissions.** This regulation is intended to limit and/or reduce particulate emissions caused by the use of wood-fired appliances, which must be EPA or District certified, and emit less than or equal to 7.5 grams particulate per hour for a non-catalytic, wood-fired appliance or 4.1 grams per hour for a catalytic wood fired appliance.

Sonoma County General Plan 2020

Section 8 of the Open Space and Resource Conservation Element of the Sonoma County General Plan 2020 contains air pollution goals, objectives, and policies for the County, including:

Goal OSRC-16: Preserve and maintain good air quality and provide for an air quality standard that will protect human health and preclude crop, plant, and property damage in accordance with the requirements of the Federal and State Clean Air Acts.

Objective OSRC-16.1: Minimize air pollution and greenhouse gas emissions.

Objective OSRC-16.2: Encourage reduced motor vehicle use as a means of reducing resultant air pollution. The following policies, in addition to those of the Circulation and Transit Element, shall be used to achieve these objectives:

Policy OSRC-16a**:** Require that development projects be designed to minimize air emissions. Reduce direct emissions by utilizing construction techniques that decrease the need for space heating and cooling.

Policy OSRC-16b**:** Encourage public transit, ridesharing, and van pooling, shortened and combined motor vehicle trips to work and services, use of bicycles, and walking. Minimize single passenger motor vehicle use.

Policy OSRC-16c**:** Refer projects to the local air quality districts for their review.

Policy OSRC-16d**:** Review proposed changes in land use designations for potential deterioration of air quality and deny them unless they are consistent with the air quality levels projected in the General Plan EIR.

Policy OSRC-16e**:** Cooperate with the local air quality district to monitor air pollution and enforce mitigations in areas affected by emissions from fireplaces and woodburning stoves.

Policy OSRC-16f: Encourage the adoption of standards, the development of new technology, and retrofitting to reduce air pollution resulting from geothermal development.

Policy OSRC-16g**:** Residential units shall be required to only install fireplaces, woodstoves or any other residential wood-burning devices that meet the gram-per-hour EPA or Oregon DEQ wood heater emissions limits (exempt devices are not allowed).

Policy OSRC-16h**:** Require that development within the BAAQMD that generates high numbers of vehicle trips, such as shopping centers and business parks, incorporate air quality mitigation measures in their design.

Policy OSRC-16i**:** Ensure that any proposed new sources of toxic air contaminants or odors provide adequate buffers to protect sensitive receptors and comply with applicable health standards. Promote land use compatibility for new development by using buffering techniques such as landscaping, setbacks, and screening in areas where such land uses abut one another.

Policy OSRC-16j**:** Require consideration of odor impacts when evaluating discretionary land uses and development projects near wastewater treatment plant or similar uses.

Policy OSRC-16k**:** Require that discretionary projects involving sensitive receptors (facilities or land uses that include members of the population sensitive to the effects of air pollutants such as children, the elderly, and people with illnesses) proposed near the Highway 101 corridor include an analysis of mobile source toxic air contaminant health risks. Project review should, if necessary, identify design mitigation measures to reduce health risks to acceptable levels.

Policy OSRC-16l**:** Work with the applicable Air Quality districts to adopt a diesel particulate ordinance. The ordinance should prioritize on site over off site mitigation of diesel particulate emissions to protect neighboring sensitive receptors from these emissions.

Policy OSRC-16m**:** Provide education and outreach to the public regarding the Air Quality Districts' "Spare the Air" Programs.

4.3.3 Impact Analysis

a. Significance Thresholds

To determine whether a project would result in a significant impact to air quality, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

1. Conflict with or obstruct implementation of the applicable air quality plan
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard
3. Expose sensitive receptors to substantial pollutant concentrations
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people

BAAQMD Significance Thresholds

This analysis uses the BAAQMD's May 2017 *CEQA Air Quality Guidelines* to evaluate air quality. The plan-level thresholds specified in the May 2017 BAAQMD *CEQA Air Quality Guidelines* were used to determine whether the proposed project impacts exceed the thresholds identified in *CEQA Guidelines* Appendix G.

CONSISTENCY WITH AIR QUALITY PLAN

Under BAAQMD's methodology, a determination of consistency with *CEQA Guidelines* thresholds should demonstrate that a project:

1. Supports the primary goals of the 2017 Clean Air Plan
2. Includes applicable control measures from the 2017 Clean Air Plan
3. Does not disrupt or hinder implementation of any 2017 Clean Air Plan control measures

SHORT-TERM EMISSIONS THRESHOLDS

The BAAQMD's May 2017 *CEQA Air Quality Guidelines* have no plan-level significance thresholds for construction air pollutants emissions. However, they do include project-level screening and emissions thresholds for temporary construction-related emissions of air pollutants. These thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAAB's existing air quality conditions and are discussed in detail below (BAAQMD 2017b).

The BAAQMD developed screening criteria in the 2017 *CEQA Air Quality Guidelines* to provide lead agencies and project applicants with a conservative indication of whether a project could result in significant air quality impacts. The screening criteria for residential land uses are shown in Table 4.3-3.

Table 4.3-3 BAAQMD Criteria Air Pollutant Screening Levels

Land Use Type	Operational Criteria Pollutant Screening Size (du)	Construction Criteria Pollutant Screening Size (du)
Single-family	325 (NO_X)	114 (ROG)
Apartment, low-rise	451 (ROG)	240 (ROG)
Apartment, mid-rise	494 (ROG)	240 (ROG)
Apartment, high-rise	510 (ROG)	249 (ROG)
Condo/townhouse, general	451 (ROG)	240 (ROG)
Condo/townhouse, high-rise	511 (ROG)	252 (ROG)
Mobile home park	450 (ROG)	114 (ROG)
Retirement community	487 (ROG)	114 (ROG)
Congregate care facility	657 (ROG)	240 (ROG)

du = dwelling unit; NO_X = oxides of nitrogen; ROG = reactive organic gases

Source: BAAQMD 2017b

If a project meets the screening criteria, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. These screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration (BAAQMD 2017b).

In addition to the screening levels above, several additional factors are outlined in the 2017 *CEQA Air Quality Guidelines* that construction activities must satisfy for a project to meet the construction screening criteria:

1. All basic construction measures from the 2017 CEQA Guidelines must be included in project design and implemented during construction
2. Construction-related activities would not include any of the following:
   a. Demolition
   b. Simultaneous occurrence of more than two construction phases (e.g., paving and building construction would occur simultaneously)
   c. Simultaneous construction of more than one land use type (e.g., project would develop residential and commercial uses on the same site) (not applicable to high density infill development)
   d. Extensive material transport (e.g., greater than 10,000 cubic yards of soil import/export) requiring a considerable amount of haul truck activity

For projects that do not meet the screening criteria above, the BAAQMD construction significance thresholds for criteria air pollutants, shown in Table 4.3-4, are used to evaluate a project's potential air quality impacts.

Table 4.3-4 BAAQMD Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds Average Daily Emissions (lbs/day)	Operational Threshold Average Daily Emissions (lbs/day)	Operational Threshold Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO_X	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	Not Applicable

Source: BAAQMD 2017b

For all projects in the SFBAAB, the BAAQMD 2017 *CEQA Air Quality Guidelines* recommends implementation of the Basic Construction Mitigation Measures listed in Table 8-2 of the Guidelines (BAAQMD 2017b). For projects that exceed the thresholds in Table 4.3-4, the BAAQMD 2017 *CEQA Air Quality Guidelines* recommends implementation of the Additional Construction Mitigation Measures listed in Table 8-3 of the Guidelines (BAAQMD 2017b).

LONG-TERM EMISSIONS THRESHOLDS

The BAAQMD's 2017 *CEQA Air Quality Guidelines* contain specific operational plan-level significance thresholds for criteria air pollutants. Plans must show the following over the planning period:

1. Consistency with current air quality plan control measures
2. Vehicle miles traveled (VMT) or vehicle trips (VT) increase is less than or equal to the plan's projected population increase

If a plan can demonstrate consistency with both criteria, then impacts are considered less than significant. The current air quality plan is the 2017 Clean Air Plan.

For project-level thresholds, the screening criteria for operational emissions are shown in Table 4.3-3. For projects that do not meet the screening criteria, the BAAQMD operational significance thresholds for criteria air pollutants, shown in Table 4.3-4, are used to evaluate a project's potential air quality impacts.

CARBON MONOXIDE HOTSPOTS

BAAQMD provides a preliminary screening methodology to conservatively determine whether a proposed project would exceed CO thresholds. If the following criteria are met, a project would result in a less than significant impact related to local CO concentrations:

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

ODORS

The BAAQMD provides minimum distances for siting of new odor sources shown in Table 4.3-5. A significant impact would occur if the project would result in other emissions (such as odors) affecting substantial numbers of people or would site a new odor source as shown in Table 4.3-5 within the specified distances of existing receptors.

Table 4.3-5 BAAQMD Odor Source Thresholds

Odor Source	Minimum Distance for Less than Significant Odor Impacts
Wastewater treatment plant	2 miles
Wastewater pumping facilities	1 mile
Sanitary Landfill	2 miles
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	2 miles
Chemical Manufacturing	2 miles
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Rendering Plant	2 miles

Source: BAAQMD 2017b

NSCAPCD Significance Thresholds

NSCAPCD has not established numerical standards of significance for emissions from construction or operational activities. In lieu of quantitative standards for projects in the NSCAPCD, the County has determined that using BAAQMD thresholds for the criteria pollutant and odor impact analysis would be most appropriate.

b. Methodology

Short-Term Emissions

Construction-related emissions are generally short-term in duration but may still cause adverse air quality impacts. Construction of development associated with the proposed project would generate temporary emissions from three primary sources: the operation of construction vehicles (e.g., scrapers, loaders, dump trucks, etc.); ground disturbance during site preparation and grading, which creates fugitive dust; and the application of asphalt, paint, or other oil-based substances. Program-level construction impacts from the proposed project are discussed qualitatively. In addition, construction emissions are compared to the project-level thresholds for a 38-unit Rezoning Site[2] to determine the number of dwelling units that would exceed project-level thresholds.

Construction emissions for the model 38-unit Rezoning Site were modeled with CalEEMod, Version 2016.3.2. The calculation methodology and input data used in CalEEMod can be found in the CalEEMod User's Guide Appendices A, D, and E (BREEZE Software 2017). CalEEMod output files for development facilitated by the project are included in Appendix AQ of this Program EIR. Construction input data for CalEEMod include but are not limited to: (1) the anticipated start and finish dates of construction activity; (2) inventories of construction equipment to be used; (3) areas to be excavated and graded; and (4) volumes of materials to be exported from and imported to the project site. The analysis assessed maximum daily emissions from individual construction activities, including demolition, site preparation, grading, building construction, paving, and architectural coating. Construction equipment estimates are based on surveys of construction projects within California conducted by members of the California Air Pollution Control Officers Association (CAPCOA) (BREEZE Software 2017).

Demolition modeling assumed that demolition of all structures would be required on a given site, (even if demolition of all structures would not be required for project implementation) with SAN-4 being the Rezoning Site with the highest potential estimated amount, using imagery on Google Earth. The site contains an approximately 48,000-square foot, two-story motel and 31,000-square foot, one-story retail building, for a total 79,000 square feet that would be demolished under project implementation.

Cut and fill estimates were based on the approximate size of the 38-unit Rezoning Sites (PEN-6, PET-1, and PET-4) of 2 acres. It was assumed that there would be 90 percent building coverage on the 2 acres (1.8 acres of building space). The buildings were assumed to have a 10-foot cut depth for the square footage, and that 20 percent of the soil would be exported and imported. For the modeled project, this would result in 5,808 cubic yards of import and 5,808 cubic yards of export. This would

[2] As described under Impact AQ-2, it was determined that a project that is 38 units or fewer would not exceed BAAQMD thresholds. While the residential development may consist of either single-family or multi-family units, single-family residences generate more trips and use more resources (energy, water) per square foot. To ensure a conservative analysis, single-family residences were used in the model to capture the worst-case emissions scenario.

result in 1,452 hauling trips; the grading period was extended to 60 days for a realistic timeframe to move the amount of soil with 24 hauling trips per day.

Long-Term Emissions

Pursuant to plan-level guidance from the BAAQMD 2017 *CEQA Air Quality Guidelines,* long-term operational emissions associated with implementation of the proposed project are analyzed qualitatively by comparing the proposed project to the 2017 Clean Air Plan goals, policies, and control measures. In addition, comparing the rate of increase of plan VMT and population is recommended by BAAQMD for determining significance of criteria pollutants impacts. If the proposed project does not meet either screening criterion then impacts would be significant.

c. Project Impacts and Mitigation Measures

Threshold:	Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1 THE PROJECT WOULD SUPPORT THE PRIMARY GOALS OF THE 2017 CLEAN AIR PLAN, WOULD IMPLEMENT APPLICABLE CONTROL MEASURES FOR THE 2017 CLEAN AIR PLAN, AND WOULD NOT DISRUPT OR HINDER IMPLEMENTATION OF ANY 2017 CLEAN AIR PLAN CONTROL MEASURES. THE PROJECT'S VMT INCREASE WOULD BE LESS THAN THE POPULATION INCREASE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Air Quality Plans

The NSCAPCD is in attainment for all pollutants and therefore is not required to develop and does not have an air quality plan; therefore, the project would not conflict with an air quality plan in the NSCAPCD.

The most recently adopted air quality plan in the SFBAAB is the 2017 Clean Air Plan. The 2017 Clean Air Plan is a roadmap showing how the San Francisco Bay Area will achieve compliance with the State one-hour ozone standard as expeditiously as practicable, and how the region will reduce transport of O_3 and O_3 precursors to neighboring air basins. The 2017 Clean Air Plan control strategy includes stationary-source control measures to be implemented through the BAAQMD regulations; mobile-source control measures to be implemented through incentive programs and other activities; and transportation control measures to be implemented through transportation programs in cooperation with the Metropolitan Transportation Commission (MTC), local governments, transit agencies, and others. The 2017 Clean Air Plan also represents the Bay Area's most recent triennial assessment of the region's strategy to attain the state one-hour ozone standard. Under BAAQMD's methodology, a determination of consistency with *CEQA Guidelines* thresholds should demonstrate that a project:

1. Supports the primary goals of the 2017 Clean Air Plan,
2. Includes applicable control measures from the 2017 Clean Air Plan, and
3. Does not disrupt or hinder implementation of any 2017 Clean Air Plan control measures.

The following includes a discussion of consistency with these criteria.

The primary goals of the 2017 Clean Air Plan are to:

1. Protect air quality and health at the regional and local scale; and
2. Protect the climate.

Any project that would not support these goals would not be considered consistent with the 2017 Clean Air Plan. On an individual project basis, consistency with BAAQMD quantitative thresholds is interpreted as demonstrating support for the 2017 Clean Air Plan goals. The nature of development facilitated by the project is to accommodate additional housing on Rezoning Sites in urban areas, near jobs, services, and transit. By allowing for the easier use of alternative methods of transportation, development facilitated by the project would increase use of alternative transportation. In addition, development facilitated by the project would comply with the latest Title 24 regulations. Therefore, the project would have the effect of reducing mobile emissions compared to the existing conditions that would protect air quality and health on a regional and a local scale and would protect the climate.

The 2017 Clean Air Plan includes 85 control measures under the following sectors: stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Many of these measures are industry-specific and would not be applicable to development facilitated by the project (e.g., stationary sources, agriculture, and natural and working lands). Measures from transportation, energy, building, water, waste, and super-GHG pollutants sectors are focused on larger-scale planning efforts (e.g., transit funding, utility energy procurement, regional energy plans) and would not directly apply to development facilitated by the project. The project would be consistent with the overall goal of these measures as development facilitated by it would comply with the latest Title 24 regulations and would increase density in urban areas, allowing for greater use of alternative modes of transportation. Development facilitated by the project does not contain elements that would disrupt or hinder implementation of any 2017 Clean Air Plan control measures. Therefore, the project would conform to this determination of consistency for the 2017 Clean Air Plan.

Project VMT and Population

According to the BAAQMD 2017 *CEQA Air Quality Guidelines,* the threshold for criteria air pollutants and precursors includes an assessment of the rate of increase of plan VMT and population. As discussed above, to result in a less than significant impact, the analysis must show that over the planning period, the proposed plan's projected VMT increase is less than or equal to its projected population increase. The existing zoning of the Rezoning Sites would result in a population of 920; implementation of the project would result in a population of 9,166, for an approximate 896 percent increase (see Section 4.14, *Population and Housing*).

Vehicle trips for development facilitated by the project were calculated using the daily VMT and are expected to increase over existing zoning by 93,260 VMT, a number developed during the transportation assessment (Appendix TRA). Given that development facilitated by the project could increase housing by 3,312 dwelling units, 93,260 VMT was divided by 3,312 to determine an approximate VMT per dwelling unit; the result was that an increase would occur of approximately 28.16 VMT per day over existing conditions per dwelling unit. Assuming 28.16 VMT per day per dwelling unit for the existing zoning's 354 units, this would result in 9,968 VMT for existing conditions. Thus, the project would increase VMT approximately 836 percent over existing conditions.

The proposed net percentage VMT increase associated with the proposed project (approximately 836 percent) would be less than the net percentage population increase (approximately 896 percent). Therefore, the project's VMT increase would not conflict with the BAAQMD's 2017 *CEQA Air Quality Guidelines* operational plan-level significance thresholds for criteria air pollutants, and would be consistent with the 2017 Clean Air Plan. Accordingly, impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact AQ-2 PROJECT CONSTRUCTION WOULD TEMPORARILY INCREASE AIR POLLUTANT EMISSIONS, POSSIBLY CREATING LOCALIZED AREAS OF UNHEALTHY AIR POLLUTION LEVELS OR AIR QUALITY NUISANCES. IMPACTS WOULD BE SIGNIFICANT AND MITIGATION MEASURES WOULD BE REQUIRED.

Construction

PLAN-LEVEL

The SFBAAB is in non-attainment for the federal standards for ozone and $PM_{2.5}$ and in non-attainment for the state standard for ozone, $PM_{2.5}$, and PM_{10}. The NCAB is in attainment for all standards. Construction activity associated with the implementation of the project may involve activities that result in air pollutant emissions. Construction activities such as demolition, grading, construction worker travel, delivery and hauling of construction supplies and debris, and fuel combustion by on-site construction equipment would generate pollutant emissions. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants, particularly during site preparation and grading. The extent of daily emissions, particularly ROGs and NO_X emissions, generated by construction equipment, would depend on the quantity of equipment used and the hours of operation for each project. The extent of $PM_{2.5}$ and PM_{10} emissions would depend upon the following factors: 1) the amount of disturbed soils; 2) the length of disturbance time; 3) whether existing structures are demolished; 4) whether excavation is involved; and 5) whether transporting excavated materials offsite is necessary. Dust emissions can lead to both nuisance and health impacts. According to the 2017 BAAQMD *CEQA Air Quality Guidelines,* during construction PM_{10} is the greatest pollutant of concern.

The BAAQMD has also identified feasible fugitive dust control measures for construction activities. These Basic Construction Mitigation Measures are recommended for all projects (BAAQMD 2017b). Project construction would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution levels or air quality nuisances. BAAQMD identified feasible fugitive dust control measures for construction activities because PM_{10} is the greatest pollutant of concern (BAAQMD 2017b). Therefore, impacts related to construction emissions would be significant for all

projects and mitigation that would implement the Basic Construction Mitigation Measures would be required.

PROJECT-LEVEL

The BAAQMD 2017 *CEQA Air Quality Guidelines* also include project-level thresholds for construction emissions. If a project does not meet BAAQMD construction screening levels (see Table 4.3-3) or the project's construction emissions exceed the project-level thresholds (see Table 4.3-4), the project's emissions would be significant and mitigation that would implement the BAAQMD 2017 *CEQA Air Quality Guidelines'* Additional Construction Mitigation Measures would be required.

A summary of Rezoning Sites requiring Additional Construction Mitigation Measures is included in Table 4.3-6. Details on how these Rezoning Sites were determined are discussed below.

Table 4.3-6 Rezoning Sites Requiring Additional Construction Mitigation Measures

Requirement[1]	Rezoning Site
Requires Additional Construction Mitigation Measures if development of Rezoning Site results in an increase of greater than 114 dwelling units over existing conditions	FOR-2, SAN-2, SAN-4, and AGU-2
Regardless of dwelling units, requires Additional Construction Mitigation Measures if development of Rezoning Site includes demolition, simultaneous occurrence of more than two construction phases simultaneous construction of more than one land use type, or extensive material transport of more than 10,000 cubic yards.	GUE-2, GUE-4, LAR-1, FOR-4, FOR-5, FOR-6, GRA-2, SAN-1, SAN-3, SAN-5, SAN-6, SAN-7, SAN-9, SAN-10, AGU-3, PEN-7, and PET-3

[1] Requirements are from BAAQMD 2017 CEQA Air Quality Guidelines (BAAQMD 2017b).

As discussed in Section 4.3.3, *Short-Term Emissions Thresholds*, the BAAQMD has construction screening levels based upon number of dwelling units that screens a project from a construction or operation criteria pollutants emissions analysis. Projects below that number of units would be considered to have less than significant criteria pollutant impacts and would not have to implement Additional Construction Mitigation Measures. For construction, the screening level would be 114 dwelling units for a residential project, regardless of the parcel size. Sites that would not be under the screening level, as they include an increase of greater than 114 dwelling units over existing conditions, would include FOR-2, SAN-2, SAN-4, and AGU-2.

Regardless of number of dwelling units, a Rezoning Site would also exceed the screening level if it would exceed project-level thresholds (see Table 4.3-4) and include at least one of the following:

1. Demolition
2. Simultaneous occurrence of more than two construction phases
3. Simultaneous construction of more than one land use type
4. Extensive material transport of more than 10,000 cubic yards

To determine which of the Rezoning Sites may fall within this category, a modeled project was analyzed to determine the maximum dwelling unit increase for a Rezoning Site that would remain under the BAAQMD thresholds. It was determined that a project that is 38 units or less would not exceed BAAQMD thresholds. Table 4.3-7 summarizes the estimated maximum daily emissions of pollutants associated with construction that could result from a project with a net increase of 38 single-family residential units, as a conservative assumption. As shown in the table, ROG, NO_X, PM_{10},

and $PM_{2.5}$ emissions would not exceed BAAQMD thresholds for a 38-unit single-family residential project. A project with more than 38 units would potentially exceed BAAQMD thresholds and thus those Rezoning Sites greater than 38 units would be a significant impact requiring Additional Construction Mitigation Measures (Mitigation Measure AQ-2). As listed in Table 4.3-6, this would include the following Rezoning Sites: GUE-2, GUE-4, LAR-1, FOR-4, FOR-5, FOR-6, GRA-2, SAN-1, SAN-3, SAN-5, SAN-6, SAN-7, SAN-9, SAN-10, AGU-3, PEN-7, and PET-3.

Table 4.3-7 Modeled Project (38 Units) Construction Emissions

	ROG[1]	NOx[1]	CO[1]	SO2[1]	PM_{10}[1]	$PM_{2.5}$[1]
Construction Year 2021	5	53	33	<1	20	12
Construction Year 2022	48	16	17	<1	1	1
Maximum Emissions	48	53	33	<1	20	12
BAAQMD Thresholds	54	54	N/A	N/A	82 (exhaust)	54 (exhaust)
Threshold Exceeded?	No	No	No	No	No	No

[1] Maximum emissions (lbs/day)

ROG = reactive organic gases, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; lbs/day = pounds per day, BAAQMD = Bay Area Air Quality Management District

N/A = Not available. The BAAQMD has not established recommended quantitative thresholds for CO and SO_2.

Notes: See Appendix AQ for modeling results. Some numbers may not add up precisely due to rounding considerations.

FUGITIVE DUST

Site preparation and grading may generate wind-blown dust that could contribute particulate matter into the local atmosphere. The BAAQMD has not established a quantitative threshold for fugitive dust emissions but rather states that projects that incorporate best management practices for fugitive dust control during construction would have a less than significant impact related to fugitive dust emissions. Development facilitated by the project would be conditioned as required by Mitigation Measure AQ-1 to include these measures; therefore, this impact would less than significant with mitigation.

Operation

BAAQMD has developed specific plan-level impact threshold for operational emissions. As stated in the BAAQMD May 2017 *CEQA Air Quality Guidelines,* the operational threshold for plans (e.g., general plans) within the SFBAAB is consistency with the current (2017) Clean Air Plan and whether projected VMT or vehicle trip increase is less than or equal to projected population increase. As discussed under Impact AQ-1, the proposed project would be consistent with the 2017 Clean Air Plan and the increase in VMT would not exceed the projected population increase per the BAAQMD CEQA Guidelines for operational emissions from plans. Therefore, impacts to operational emissions would be less than significant.[3]

[3] The project-level screening criteria for operational emissions is 325 dwelling units for single-family residences and 451 dwelling units for multi-family residences (low-rise apartments). The greatest change in allowable dwelling units would occur under FOR-2 with an increase of 283 dwelling units. Therefore, on a project by project level, no development facilitated by the project would exceed either the single-family or multi-family residential screening criteria threshold for operational emissions. As stated in the BAAQMD CEQA Air Quality Guidelines, if the project meets the screening criteria, the project would not result in the generation of operational-related criteria air

Mitigation Measure

The BAAQMD 2017 *CEQA Air Quality Guidelines* Basic Construction Mitigation Measures would be required for all projects to reduce temporary construction impacts through implementation of Mitigation Measure AQ-1.

AQ-1 BASIC CONSTRUCTION MITIGATION MEASURES

All development facilitated by the project (regardless of whether the development is under the jurisdiction of the SFBAAB or the BAAQMD) shall be required to reduce construction emissions of reactive organic gases, nitrogen oxides, and particulate matter (PM_{10} and $PM_{2.5}$) by implementing the BAAQMD's Basic Construction Mitigation Measures (described below) or equivalent, expanded, or modified measures based on project and site-specific conditions.

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day, with priority given to the use of recycled water for this activity.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping shall be prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 mph.
5. 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.
6. 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.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
8. A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

AQ-2 ADDITIONAL CONSTRUCTION MITIGATION MEASURES

In addition to implementation of Mitigation Measure AQ-1, for any project (regardless of whether the development is under the jurisdiction of the SFBAAB or the BAAQMD) that meets the following conditions and as listed in Table 4.3-6, the County shall condition development facilitated by the project to implement BAAQMD CEQA Air Quality Guidelines' Additional Construction Mitigation Measures:

pollutants that exceed the thresholds of significance shown in Table 4.3-4. Therefore, operational criteria pollutant impacts from development facilitated by the project would be less than significant.

1. Exceed the BAAQMD construction screening threshold of a change in allowable dwelling units of 114 dwelling units for single-family residences or 240 dwelling units for multi-family residences
2. Would result in a change in allowable dwelling units of more than 38 units
3. Would require demolition or simultaneous occurrence of more than two construction phases
4. Simultaneous construction of more than one land use type (e.g., a mixed-use project involving commercial and residential)
5. Extensive material transport of more than 10,000 cubic yards

In addition to implementation of Mitigation Measure AQ-1, for any Rezoning Sites that meet the criteria listed above, the following measures (or equivalent, expanded, or modified measures based on project- and site-specific conditions) shall be implemented throughout construction of the project:

1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.
2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks shall have at maximum 50 percent air porosity.
4. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.
6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12-inch compacted layer of wood chips, mulch, or gravel.
8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.
9. Minimizing the idling time of diesel-powered construction equipment to two minutes.
10. The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NO_X reduction and 45 percent PM reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.
11. Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).
12. Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM.
13. Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy-duty diesel engines.

Significance After Mitigation

For Rezoning Sites listed in Table 4.3-6, impacts would be less than significant with implementation of Mitigation Measures AQ-1 and AQ-2. For Rezoning Sites not identified Table 4.3-6, impacts would be less than significant with implementation of Mitigation Measure AQ-1 which would require implementation of BAAQMD Basic Construction Mitigation Measures for all projects at the Rezoning Sites.

Threshold:	Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS FROM CO HOTSPOTS OR TACS. IN ADDITION, DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT SITE NEW SENSITIVE LAND USES NEAR SUBSTANTIAL POLLUTANT GENERATING LAND USES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Carbon Monoxide Hotspots

As identified in the BAAQMD 2017 *CEQA Air Quality Guidelines*, a project would result in a less than significant impact related to CO concentrations if it is consistent with an applicable congestion management program; would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; and would not increase traffic volumes at affected intersections more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

The busiest intersection identified in the Traffic Memorandum under the Cumulative Plus Project scenario is at Airport Boulevard and Fulton Road, near the Larkfield Rezoning Sites, with 4,246 vehicle turning motions through the intersection per PM peak hour (Appendix TRA). This would be substantially below the 44,000 vehicle per hour threshold described above. Therefore, development facilitated by the project would not result in individually or cumulatively significant impacts from CO emissions, and impacts would be less than significant.

Toxic Air Contaminants

CONSTRUCTION

Construction-related activities would result in short-term emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation (e.g., excavation, grading, and clearing), building construction, and other miscellaneous activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM, as discussed below, outweighs the potential non-cancer[4] health impacts (CARB 2020).

Generation of DPM from construction typically occurs in a single area for a short period. Construction of development facilitated by the project would occur over approximately a decade but use of diesel-powered construction equipment in any one area would likely occur for no more than a few years for an individual project and would cease when construction is completed in that area. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time,

[4] Non-cancer risks include premature death, hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function (CARB 2020).

meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the development (OEHHA 2015).

The maximum $PM_{2.5}$ emissions, which is used to represent DPM emissions for this analysis, would occur during site preparation and grading activities. While site preparation and grading emissions represent the worst-case condition, such activities would not be expected to last longer than a year for the largest development. A construction period of one year would represent a small percentage of the typical health risk calculation periods. $PM_{2.5}$ emissions would decrease for the remaining construction period because construction activities such as building construction and paving would require less construction equipment. Therefore, DPM generated by construction from development facilitated by the project is not expected to create conditions where the probability that the maximally exposed individual would contract cancer is greater than 10 in one million or to generate ground-level concentrations of noncarcinogenic TACs that exceed a hazard index greater than one for the maximally exposed individual. This impact would be less than significant.

OPERATION

In the Bay Area, there are several urban or industrialized communities where the exposure to TACs is relatively high in comparison to others. However, based on the BAAQMD CEQA Guidelines (Figure 5-1), none of the Rezoning Sites are in an impacted community. (There are no impacted sites in Sonoma County.) Sources of TAC's include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities (BAAQMD 2017b). Operation of development facilitated by the project does not involve any of these uses; therefore, it is not considered a source of TACs. This impact would be less than significant.

Project Siting

Development facilitated by the project would occur under both the jurisdictions of BAAQMD and NSCAPCD. To provide a consistent analysis between Rezoning Sites in both regions, CARB screening methodology for project siting is used in this analysis. In 2005, CARB issued recommendations to avoid siting new residences within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day or close to known stationary TAC sources (CARB 2005). According to the project Traffic Memorandum, the busiest intersection near Rezoning Sites would be Airport Boulevard and Fulton Road with 4,426 vehicle turning movements during the PM hour (Appendix TRA). Assuming this represents 10 percent of average daily traffic on the roadways, this would equal an approximate total of 44,260 average daily traffic on the busiest non-freeway roadways near Rezoning Sites, which would not exceed CARB siting recommendations to avoid urban roads with 100,000 vehicles/day or rural roads with 50,000 vehicles/day. Development facilitated by the project could place sensitive receptors living in housing within approximately 500 feet of freeways such as Highways 101, 116, 128, and 12. The Rezoning Sites within 500 feet of a freeway include the following: GEY-1 through GEY-4, FOR-1, FOR-3, FOR-5, GRA-3, SAN-4, SAN-9, and SON-1 through SON-4.

CARB released a technical advisory on reducing air pollution near high-volume roadways to clarify the 500-foot recommendation from 2005 due to the increased focus on and benefits from infill development, which can often occur within 500 feet of a major roadway (CARB 2017). As described in the technical advisory, California has implemented various measures to improve air quality and reduce exposure to traffic emissions. These include the Diesel Risk Reduction Plan, which aims to reduce particulate matter emissions from diesel vehicles. The continued electrification of California's vehicle fleet would also reduce $PM_{2.5}$ levels, and ongoing efforts to reduce emissions from cars and trucks and to move vehicles towards "zero emission" alternatives will continue to drive down traffic pollution (CARB 2017).

As shown in Table 4.3-2, the nearest monitoring stations to the Rezoning Sites have shown the area to have relatively clean air, with only one exceedance of ozone and a handful of exceedances of $PM_{2.5}$. Development facilitated by the project would comply with the residential indoor air quality requirements in the 2019 Title 24 Building Energy Efficiency Standards, which require Minimum Efficiency Reporting Value 13 (or equivalent) filters for heating/cooling systems and ventilation systems in residences (Section 150.0[m]) or would implement future standards that would be anticipated to be equal to or more stringent than 2019 standards. Therefore, the project would not expose its future sensitive receptors to substantial pollutant concentrations, and this impact would be less than significant

Mitigation Measures

Mitigation measures would not be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact AQ-4 IMPLEMENTATION OF THE PROJECT WOULD NOT CREATE OBJECTIONABLE ODORS THAT COULD AFFECT A SUBSTANTIAL NUMBER OF PEOPLE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Table 4.3-5 provides BAAQMD odor screening distances for land uses with the potential to generate substantial odor complaints. Those uses include wastewater treatment plants, landfills or transfer stations, refineries, composting facilities, confined animal facilities, food manufacturing, smelting plants, and chemical plants. As development facilitated by the project would be residential, none of the uses identified in the table would occur on the sites. Therefore, development facilitated by the project would not generate objectionable odors affecting a substantial number of people during operation.

During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust both during normal use and when idling. However, these odors would be temporary and transitory and would cease upon completion. Therefore, development facilitated by the project would not generate objectionable odors affecting a substantial number of people. This impact would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.4 Biological Resources

This section evaluates the potential for significant impacts to biological resources in and around the Rezoning Sites that would result from development facilitated by the proposed project. The Biological Resources Assessment (BRA) evaluated the potential for biological conditions within the Biological Study Area (BSA) (i.e., plant and wildlife species, vegetation communities, jurisdictional waters, wildlife movement areas, and other sensitive habitats) and assessed the potential for significant impacts to biological resources as a result of project implementation. The BRA was completed by Rincon Consultants, Inc. in June 2020 (revised October 2022), and is included as Appendix BIO. A summary of the results of the BRA are presented in this section, and the impacts analysis presented in this section is based on the findings of the BRA. The BSAs defined in the BRA includes the minimum boundary of all Rezoning Sites in each of the 11 Urban Service Areas and is described further below.

4.4.1 Existing Conditions

A description of the Urban Service Areas containing the Rezoning Sites is provided below. The BSAs evaluated for this analysis include the minimum bounding rectangle for all Rezoning Sites in each of the 11 Urban Service Areas, along with a 500-foot buffer to encompass potential impacts to biological resources, as shown in Figure 4.4-1 through Figure 4.4-11. A summary of the total acreage of each BSA is presented below in Table 4.4-1.

Table 4.4-1 Total Acreage of 11 Biological Study Areas

BSA	Total Acreage
Geyserville	129.4
Guerneville	367.6
Larkfield	212.4
Forestville	459.9
Graton	368.3
Santa Rosa	829.1
Glen Ellen	30.1
Agua Caliente	156.6
Penngrove	306.1
Petaluma	60.8
Sonoma	41.2

Geyserville

The Geyserville Urban Service Area, located in northern Sonoma County, in northern Geyserville, contains four Rezoning Sites: GEY-1 through GEY-4. The sites are situated between Highway 101 to the south, Geyserville Avenue to the north, Canyon Road to the west, and urban development to the east. The Rezoning Sites within the BSA are comprised of a fallow field and rural residential areas. Fallow agricultural land is also located north of the BSA. Wood Creek runs through the BSA, between the Rezoning Sites.

Figure 4.4-1 Biological Study Area – Geyserville

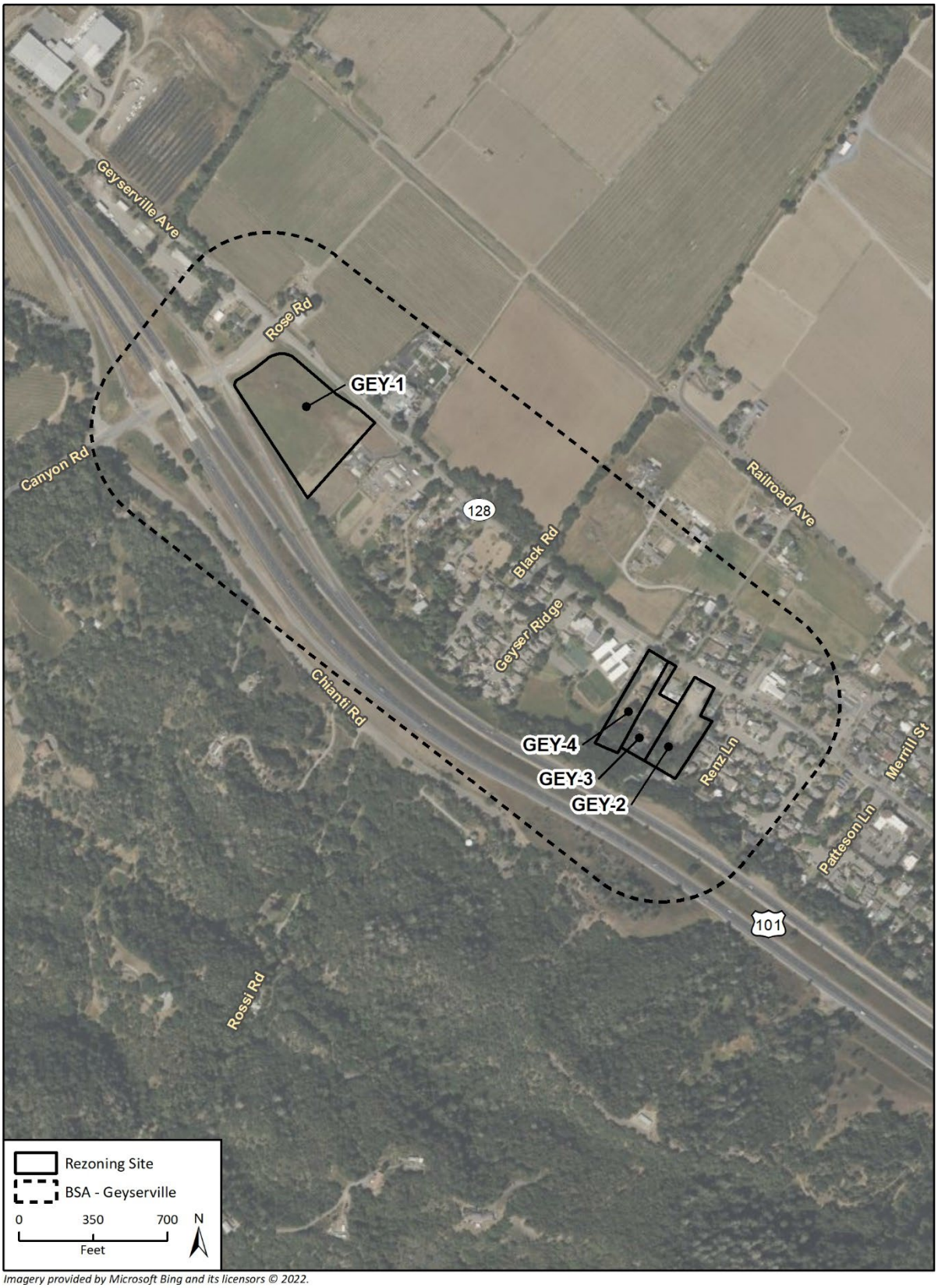

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Figure 4.4-2 Biological Study Area – Guerneville

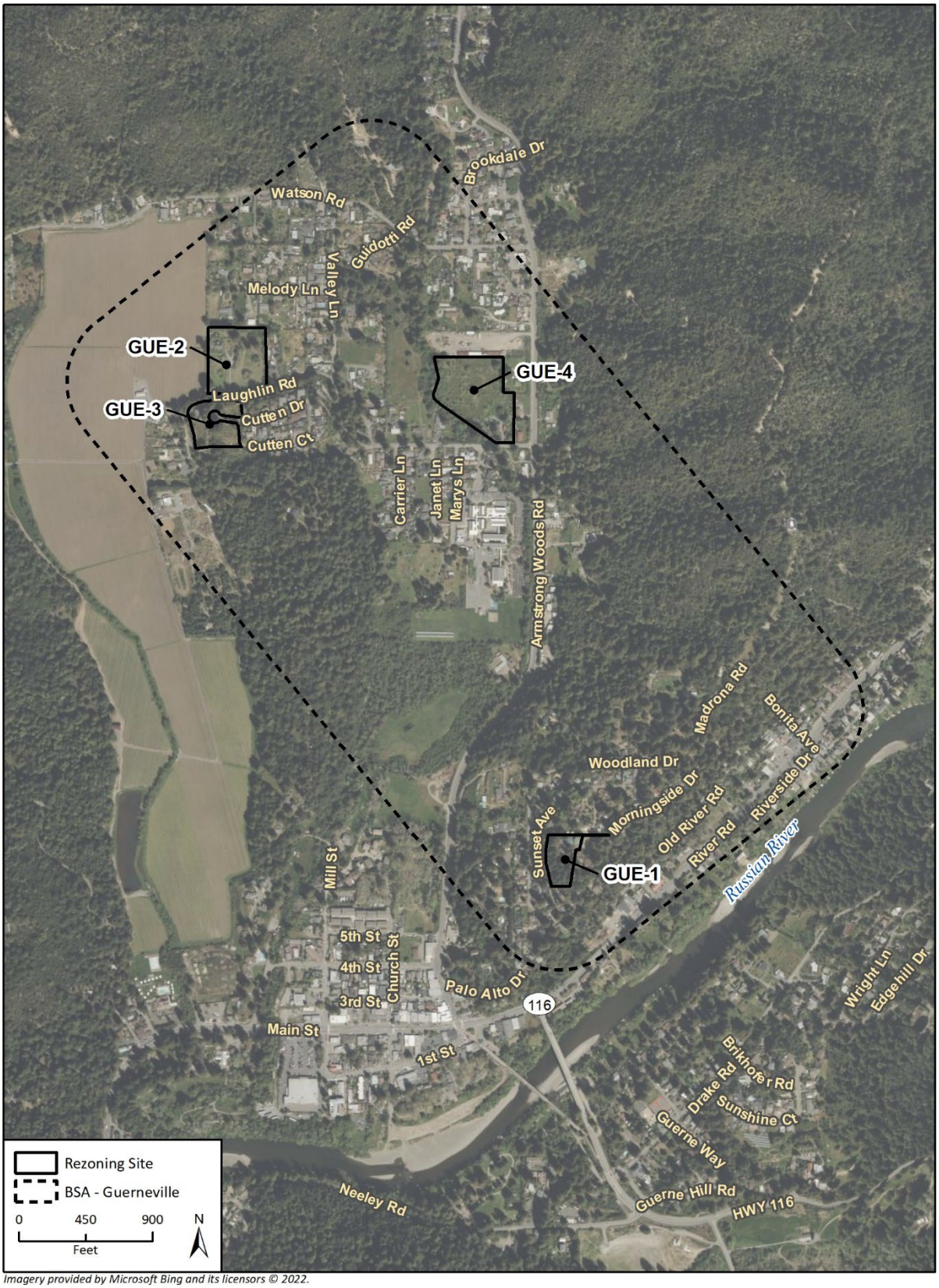

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Figure 4.4-3 Biological Study Area – Larkfield

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Figure 4.4-4 Biological Study Area – Forestville

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Figure 4.4-5 Biological Study Area – Graton

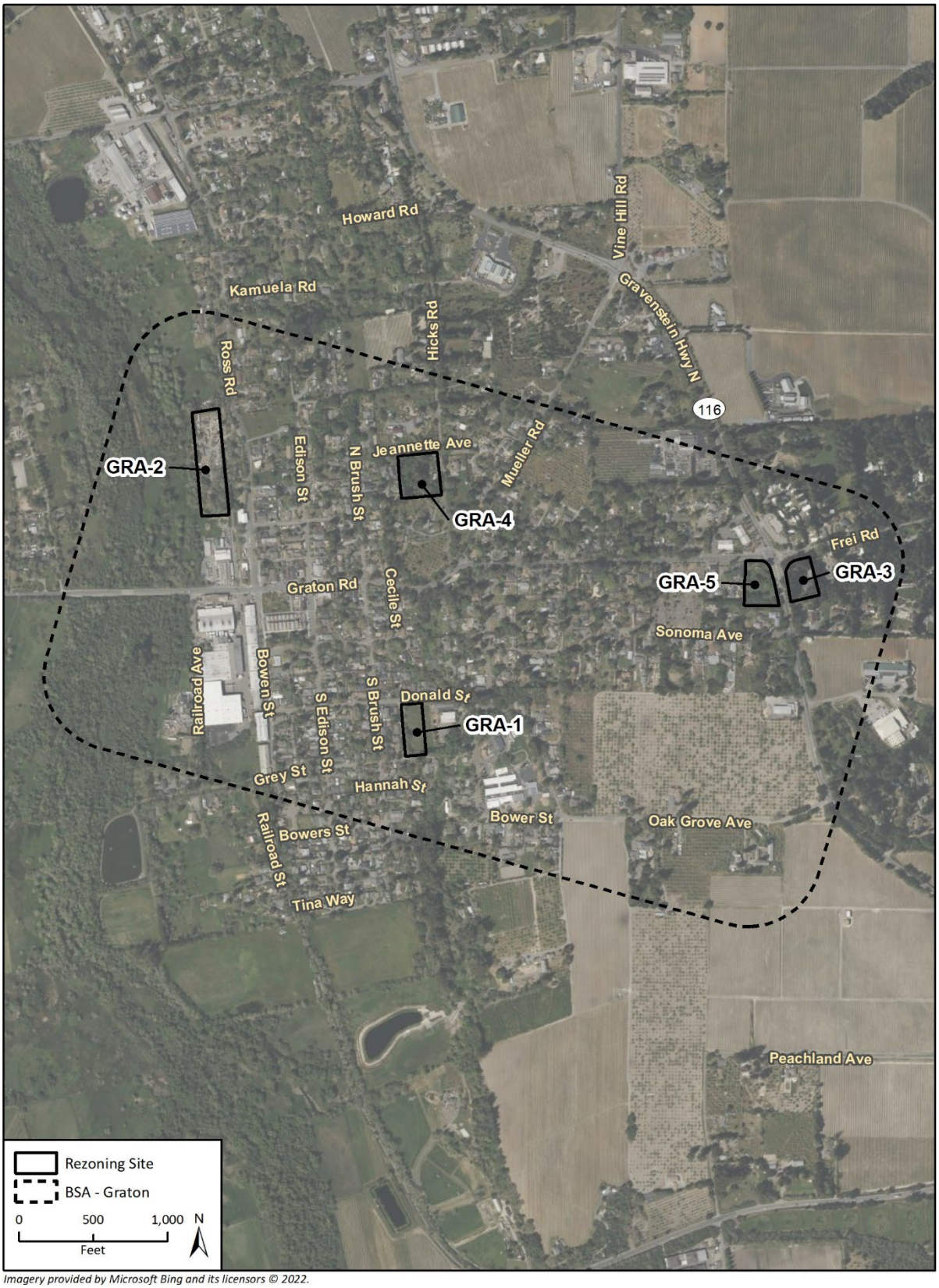

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Figure 4.4-6 Biological Study Area – Santa Rosa

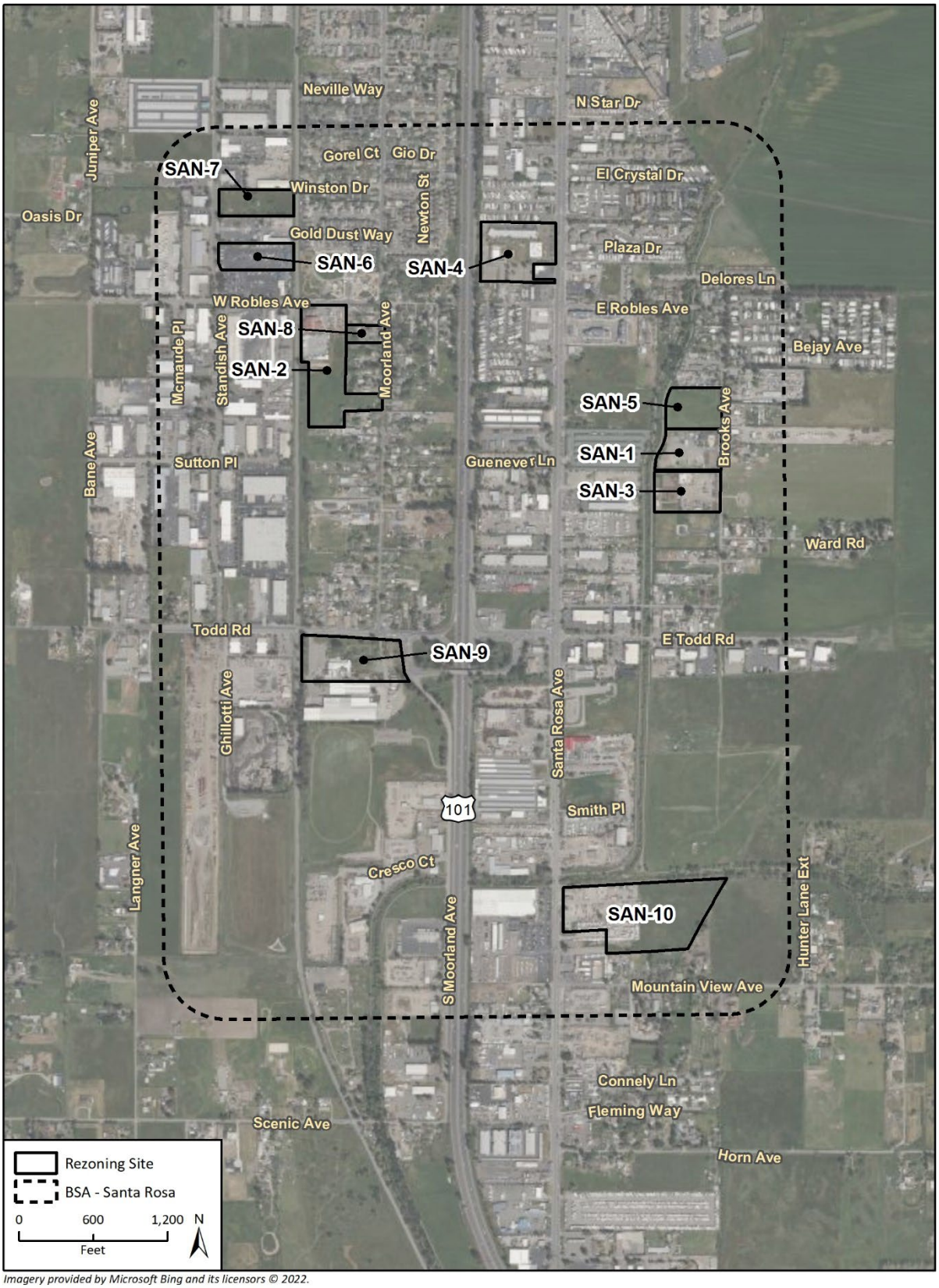

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Figure 4.4-7 Biological Study Area – Glen Ellen

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Figure 4.4-8 Biological Study Area – Agua Caliente

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Figure 4.4-9 Biological Study Area – Penngrove

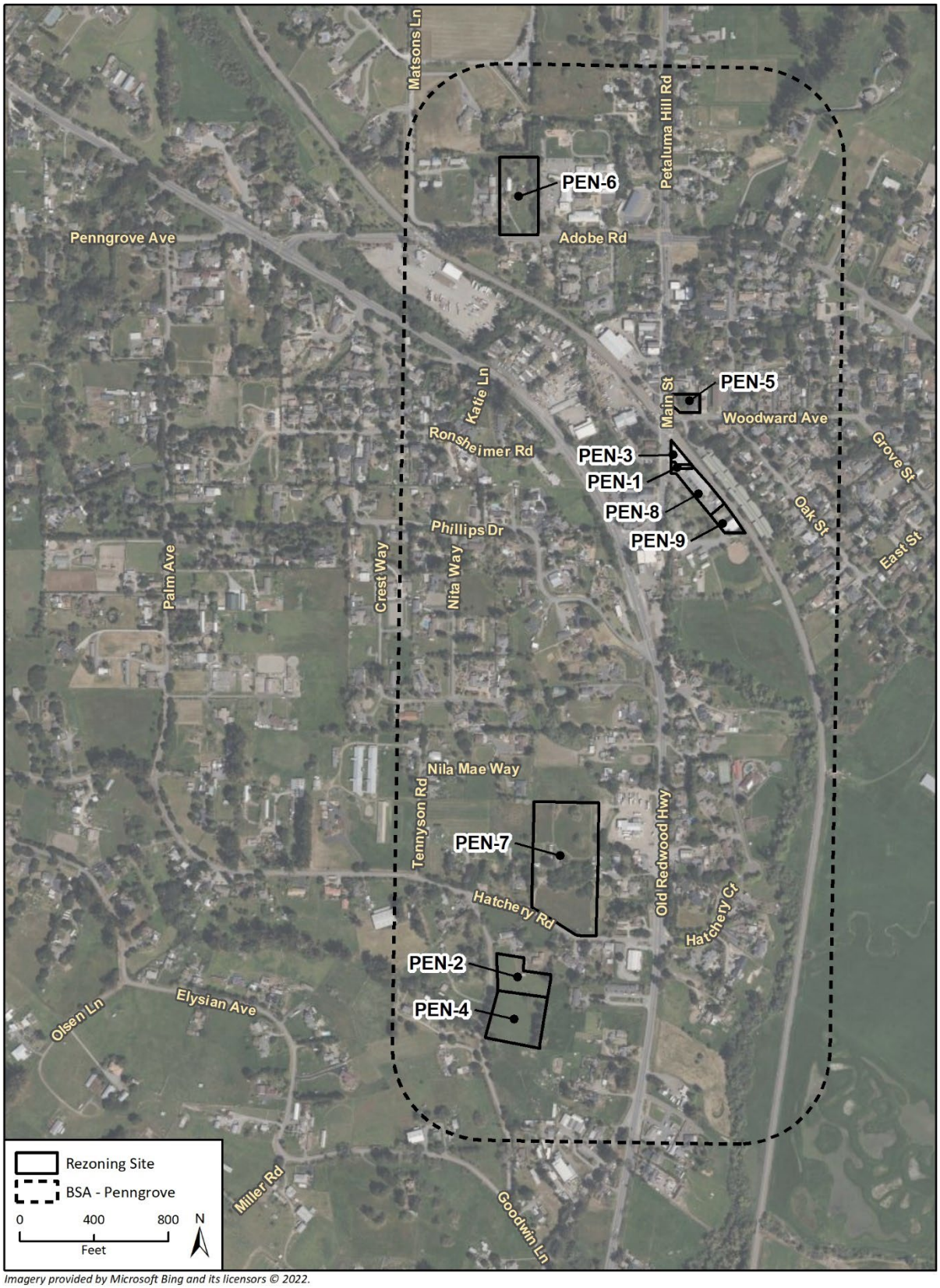

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Figure 4.4-10 Biological Study Area – Petaluma

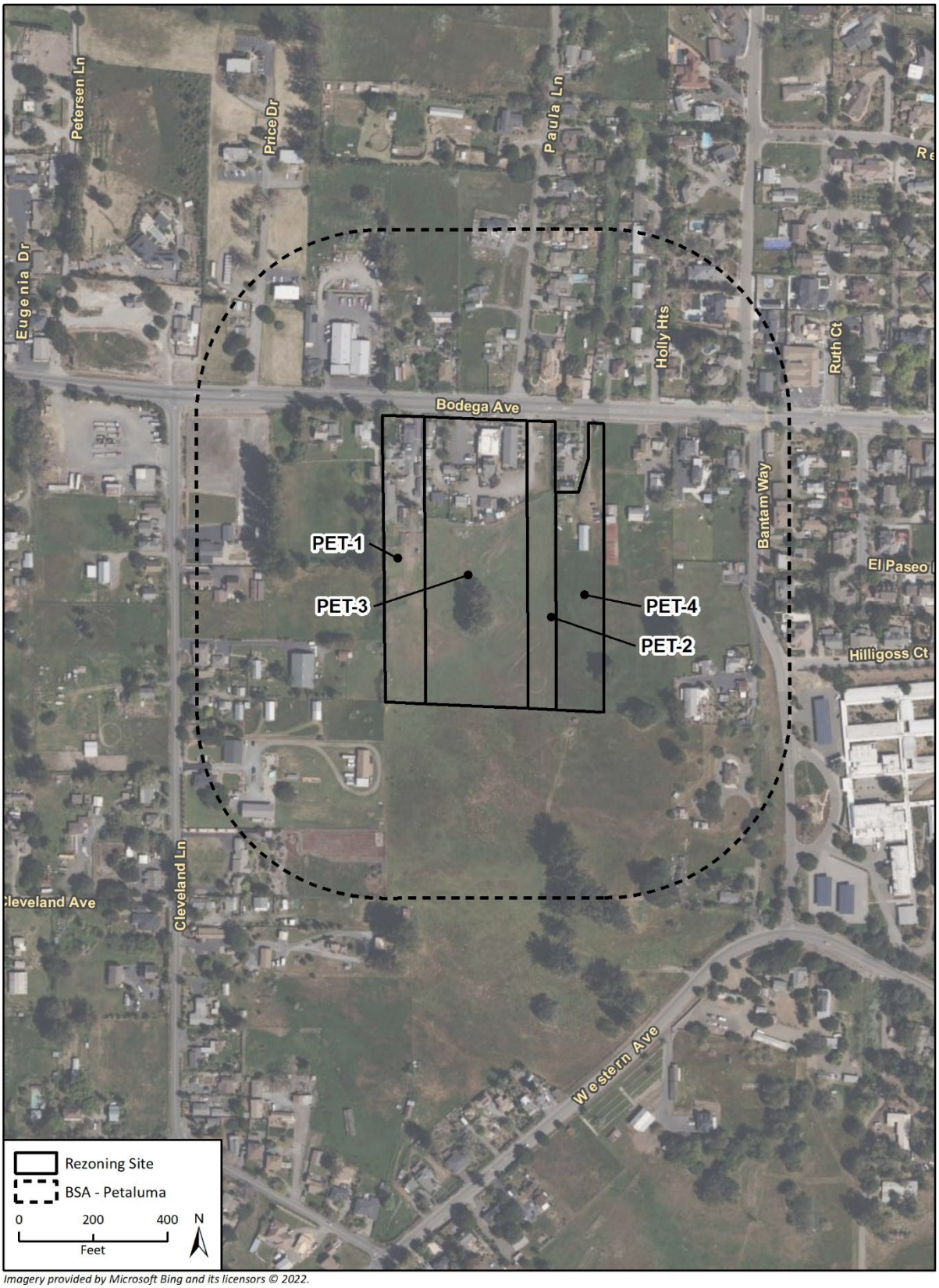

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Figure 4.4-11 Biological Study Area – Sonoma

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Additional data provided by Sonoma County Water Agency, Sonoma County Agricultural Preservation and Open Space District, Sonoma County Vegetation Mapping and LiDAR Program.

Guerneville

The Guerneville Urban Service Area is located in Guerneville between Armstrong Redwoods State Natural Reserve and the Sonoma Coast State Park. Four Rezoning Sites are envisioned for this service area (GUE-1 through GUE-4). The BSA is located within urban development, with woodland habitat to the north and east, the Russian River approximately 300 feet to the south, and fallow agricultural land surrounded by woodland habitat to the west. Fife Creek runs through the southeast portion of the BSA. The Rezoning Sites within the BSA are comprised of rural residential areas and undeveloped land.

Larkfield

The Larkfield Urban Service Area, located in central Sonoma County, includes eight Rezoning Sites (LAR-1 through LAR-8). The BSA is situated in urban development. All Rezoning Sites are surrounded by urban development, including roads, commercial development, and residential homes. Mark West Creek runs through the southern portion of the BSA's buffer zone. The Rezoning Sites within the BSA are comprised of developed areas, fallow agricultural fields, and undeveloped land.

Forestville

The Forestville Urban Service Area is located in central Sonoma County and contains six Rezoning Sites (FOR-1 through FOR-6). The BSA is situated in urban development interspersed with woodland habitat. Urban development, including roads, commercial development, and residential homes, is located to the north and east, fallow agricultural lands are located to the south, and woodland habitat is located to the west of the BSA. Green Valley Creek runs through the buffer zone on the southeast side of the BSA. A freshwater pond is located in the buffer zone to the south. The Rezoning Sites within the BSA are comprised of rural residential areas and undeveloped land.

Graton

The Graton Urban Service Area, located in central Sonoma County, in northeastern Graton, includes five Rezoning Sites (GRA-1 through GRA-5). The BSA is situated in an urban setting; all but one site would be surrounded by urban development. Site GRA-2 is situated in riparian habitat, adjacent to Atascadero Creek. Atascadero Creek runs through the BSA's buffer zone on the western portion of the BSA. The western portion of the BSA contains riparian habitat, and the southeastern portion contains lands historically used for agricultural purposes that have since become overgrown with vegetation.

Santa Rosa

The Santa Rosa Urban Service Area, located south of the City of Santa Rosa, contains 10 Rezoning Sites (SAN-1 through SAN-10). The BSA is situated in an urbanized area, and all Rezoning Sites would be surrounded by urban development, including roads, commercial development, and residential homes. Highway 101 bisects the BSA. The Rezoning Sites within the BSA are comprised of developed areas, fallow agricultural fields, and undeveloped land.

Glen Ellen

The Glen Ellen Urban Service Area is located in southeastern Sonoma County, situated between Jack London State Historic Park and Sonoma Valley Regional Park. This service area contains two Rezoning Sites (GLE-1 and GLE-2). The Rezoning Sites would be surrounded by urban development, including Arnold Drive to the west, commercial and residential developments to the north and east,

and Carquinez Ave to the south. Calabazas Creek runs through the western portion of the BSA's buffer zone, where it meets with the Sonoma Creek and continues through the southern portion of the buffer zone. Trees are interspersed throughout the BSA. Sonoma Valley Regional Park is located approximately 0.25-mile northeast of the BSA and includes Suttonfield Lake, located approximately 0.6-mile northeast of the BSA.

Agua Caliente

The Agua Caliente Urban Service Area is located in southeastern Sonoma County, north of the City of Sonoma and contains three Rezoning Sites (AGU-1 through AGU-3). Sonoma Creek and Agua Caliente Creek are located within the BSA on the eastern portion of the site. Site AGU-2 is located in the stream. The other two Rezoning Sites are located in rural residential areas and undeveloped land. The northern, western, and southern portion of the BSA contains urban development, including roads, commercial development, and residential homes.

Penngrove

The Penngrove Urban Service Area, located between the cities of Santa Rosa and Petaluma in southern Sonoma County, includes nine Rezoning Sites (PEN-1 through PEN-9). The BSA is situated in an urbanized area, and all Rezoning Sites are surrounded by urban development, including roads, commercial development, and residential homes. Open, fallow agricultural land is located east of the BSA. Lichau Creek runs through the center/eastern portion of the BSA, connecting to the Petaluma River to the south. The Rezoning Sites within the BSA are comprised of developed and rural residential areas, and undeveloped land.

Petaluma

The Petaluma Urban Service Area is located adjacent to the City of Petaluma in southern Sonoma County and includes four Rezoning Sites (PET-1 through PET-4). The Rezoning Sites would be situated together and surrounded by urban development, with Bodega Avenue to the north, commercial and residential developments to the east, Western Avenue to the south, and Cleveland Lane to the west. The southern portion of the BSA's buffer zone contains open, fallow agricultural land. The Rezoning Sites within the BSA are comprised of rural residential areas and undeveloped land.

Sonoma

The Sonoma Urban Service Area is located on the southern border of the City of Sonoma in southeastern Sonoma County. The study area includes four Rezoning Sites (SON-1 through SON-4). The Rezoning Sites would be located in a developed area, and surrounded by urban development, including Leveroni Road to the north, Broadway to the east, and commercial and residential developments to the south and to the west. The Rezoning Sites within the BSA are comprised of rural residential and developed areas.

Vegetation Communities and Land Cover Types

A total of 32 terrestrial vegetation communities or other land cover types were mapped within the BSAs based on the Sonoma County Vegetation Mapping and LiDAR Program. See Appendix BIO for a complete summary of the methods, and Figure 3 of Appendix BIO for mapping of the various vegetation communities and land cover types that occur within BSAs. The following vegetation communities (including some subset communities) were mapped within the BSA:

1. Pacific Madrone (*Arbutus menziesii*); 12.8 acres in the Guerneville BSA
2. Barren; 2.6 acres in the Geyserville and Santa Rosa BSAs
3. California Annual and Perennial Grassland; 612.4 acres in all BSAs
4. Deciduous Orchard; 71.7 acres in the Geyserville, Guerneville, Forestville, and Graton BSAs
5. Deciduous Orchard, Vineyard, Irrigated Row and Field Crops; 2.9 acres in the Graton BSA
6. Eucalyptus (*Eucalyptus* spp.), tree of heaven (*Ailanthus altissima*), black locust (*Robinia pseudoacacia*); 8.5 acres in the Graton, Santa Rosa, Penngrove, and Petaluma BSAs
7. Irrigated Hayfield; 14.1 acres in the Guerneville and Santa Rosa BSAs
8. Irrigated Row and Field Crops; 1.4 acres in the Larkfield, Santa Rosa, and Sonoma BSAs
9. Non-native Forest & Woodland; 112.8 acres in the Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Penngrove, and Sonoma BSAs
10. Non-native Shrub; 5.4 acres in the Guerneville, Forestville, and Graton BSAs
11. Tanoak (*Notholithocarpus densiflorus*); 5.6 acres in the Guerneville BSA
12. Fremont cottonwood (*Populus fremontii*); 11.5 acres in the Guerneville, Larkfield, Forestville, and Agua Caliente BSAs
13. Douglas fir (*Pseudotsuga menziesii*); 16.4 acres in the Guerneville, Forestville, and Graton BSAs
14. Oak (*Quercus agrifolia, Q. douglasii, Q. garryana, Q. kelloggii, Q. lobata, Q. wislizeni*); 37.2 acres in the Larkfield, Forestville, Graton, and Glen Ellen BSAs
15. Coast live oak (*Quercus agrifolia*); 35.5 acres in the Geyserville, Guerneville, Larkfield, Graton, Santa Rosa, and Penngrove BSAs
16. Blue oak (*Quercus douglasii*); <0.1 acre in the Geyserville BSA
17. Oregon oak (*Quercus garryana*) (tree); 8.5 acres in the Forestville BSA
18. Valley oak (*Quercus lobata*); 38.0 acres in the Larkfield, Forestville, Graton, Glen Ellen, Agua Caliente, and Sonoma BSAs
19. Himalayan blackberry (*Rubus armeniacus*), rattlebox (*Sesbania punicea*), common fig (Fic*us carica*); 5.4 acres in the Guerneville, Forestville, Graton, and Penngrove BSAs
20. Coast redwood (*Sequoia sempervirens*); 166.5 acres in the Guerneville, Forestville, and Graton BSAs
21. Southwestern North American Riparian Evergreen and Deciduous Woodland; 30.1 acres in the Guerneville, Larkfield, Forestville, Agua Caliente, and Penngrove BSAs
22. Southwestern North American Riparian/Wash Scrub; 43.1 acres in the Guerneville, Forestville, Graton, and Santa Rosa BSAs
23. Temperate Forest; 38.9 acres in the Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Penngrove, Petaluma, and Sonoma BSAs
24. California bay (*Umbellularia californica*); 8.2 acres in the Forestville and Agua Caliente BSAs
25. Urban; 1,501.0 acres in all BSAs
26. Vancouverian Riparian Deciduous Forest; 56.9 acres in the Geyserville, Guerneville, Larkfield, Forestville, Graton, Glen Ellen, Agua Caliente, and Penngrove BSAs
27. Vineyard; 108.5 acres in the Geyserville, Guerneville, Larkfield, Forestville, Graton, Penngrove, Petaluma, and Sonoma BSAs
28. Water; 0.2 acre in the Guerneville, Larkfield, Glen Ellen, Agua Caliente, and Penngrove BSAs

29. Water Treatment Pond; 2.7 acres in the Forestville BSA
30. Western North America Vernal Pool; 4.8 acres in the Santa Rosa and Penngrove BSAs
31. Western North American Freshwater Aquatic Vegetation; 0.1 acre in the Forestville BSA
32. Western North American Freshwater Marsh; 12.9 acres in the Guerneville, Forestville, Graton, Santa Rosa, and Penngrove BSAs

Descriptions of each vegetation community type is provided in Appendix BIO.

Special Status Species

A total of 160 special status plant species known to occur in the region were evaluated for their potential to occur in the BSA (Appendix BIO). Based on the size of the BSA and the types and quality of natural vegetation communities with the BSA, 82 special status plant species could be excluded based on the lack of species-specific habitat features within the BSAs. The specific habitat features absent from the BSAs include, but are not limited to coastal dunes, salt marsh, chaparral, and closed-cone coniferous forest. Special status plants generally have a low potential to occur within the BSAs due to the developed nature of most of the sites; however, many of the BSAs are located adjacent to undeveloped areas and overlap some portion of natural habitats and aquatic features. A total of 78 special status plant species have potential to occur within the BSA (Appendix BIO). Those plants that are federally and/or state listed as endangered or threatened, or are presumed present are discussed in detail in Table 4.4-2, Table 4.4-2, and Table 4.4-3 below. Four species have been documented within the BSAs, including one federally endangered species (Table 4.4-3). The remaining 52 species with potential to occur have a California Rare Plant Rank (CRPR) of 1B to 2B (Appendix BIO).

Table 4.4-2 Federal and State Listed Plant Species with Potential to Occur in the BSA

Common Name	Scientific Name	Status	Potential to Occur	BSA
Baker's manzanita	*Arctostaphylos bakeri* ssp. *bakeri*	SR	Low	Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, Sonoma
Marin manzanita	*Arctostaphylos virgata*	FE/SCE	Low	Guerneville, Glen Ellen
Clara Hunt's milk-vetch	*Astragalus claranus*	FE/ST	Low	Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, Sonoma
Vine Hill clarkia	*Clarkia imbricata*	FE/SE	Low	Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, Sonoma
Baker's larkspur	*Delphinium bakeri*	FE/SE	Low	Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, Sonoma
Mason's lilaeopsis	*Lilaeopsis masonii*	SR	Low	Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, Sonoma

Common Name	Scientific Name	Status	Potential to Occur	BSA
Geysers panicum	*Panicum acuminatum* var. *thermale*	SE	Low	Geyserville, Petaluma, Sonoma
North Coast semaphore grass	*Pleuropogon hooverianus*	ST	Low	Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, Sonoma
two-fork clover	*Trifolium amoenum*	FE	Low	Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Sonoma
Sonoma alopecurus	*Alopecurus aequalis* var. *sonomensis*	FE	Moderate	Guerneville, Larkfield, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Sonoma
Sonoma sunshine	*Blennosperma bakeri*	FE/SE	Moderate	Santa Rosa, Penngrove
Pitkin Marsh paintbrush	*Castilleja uliginosa*	SE	Moderate	Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Sonoma
Loch Lomond button-celery	*Eryngium constancei*	FE/SE	Moderate	Santa Rosa, Penngrove
Boggs Lake hedge-hyssop	*Gratiola heterosepala*	SE	Moderate	Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Sonoma
Burke's goldfields	*Lasthenia burkei*	FE/SE	Moderate	Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Sonoma
Contra Costa goldfields	*Lasthenia conjugens*	FE	Moderate	Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Sonoma
Pitkin Marsh lily	*Lilium pardalinum* ssp. *pitkinense*	FE/SE	Moderate	Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Sonoma
Sebastopol meadowfoam	*Limnanthes vinculans*	FE/SE	Moderate	Santa Rosa, Penngrove
few-flowered navarretia	*Navarretia leucocephala ssp. pauciflora*	FE/ST	Moderate	Santa Rosa, Penngrove
many-flowered navarretia	*Navarretia leucocephala* ssp. *plieantha*	FE/SE	Moderate	Santa Rosa, Penngrove
Geysers panicum	*Panicum acuminatum* var. *thermale*	SE	Moderate	Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Sonoma
Kenwood Marsh checkerbloom	*Sidalcea oregana* ssp. *valida*	FE/SE	Moderate	Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Sonoma
Pacific Grove clover	*Trifolium polyodon*	SR	Moderate	Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Sonoma

Notes: FE = Federal Endangered; SR = State Rare; ST = State Threatened; SE = State Endangered

Source: Appendix BIO, Table 4

Table 4.4-3 Special Status Plants Documented in the BSA

Common Name	Scientific Name	Status	BSA
congested-headed hayfield tarplant	*Hemizonia congesta* ssp. *congesta*	1B.2	Larkfield, Glen Ellen, Agua Caliente, Sonoma
Sonoma alopecurus	*Alopecurus aequalis* var. *sonomensis*	FE	Forestville
holly-leaved ceanothus	*Ceanothus purpureus*	1B.2	Guerneville
pappose tarplant	*Centromadia parryi* ssp. *parryi*	1B.2	Penngrove

Source: Appendix BIO, Table 5

Special Status Animal Species

A total of 62 special status animal species known to occur in the region were evaluated for their potential to occur on the project sites (Appendix BIO). Based on the size of the BSA and the types and quality of natural vegetation communities within the BSA, only 26 special status animal species could be excluded based on the lack of species-specific habitat features present within the BSAs. These species generally occur in marine or salt marsh habitats, or the BSA is outside of the species known range. Special status animals generally have a low potential to occur within the BSAs due to the developed nature of most of the sites; however, many of the BSAs are located adjacent to undeveloped areas and overlap some portion of natural habitats and aquatic features. Thirty-six special status animal species have some potential to occur in the BSA, including 19 federal- or state-listed species (Table 4.4-4).

Table 4.4-4 Federal and State Listed Animal Species with Potential to Occur in the BSA

Common Name	Scientific Name	Status	Potential to Occur	BSA
Crotch bumble bee	*Bombus crotchii*	SC	Low	Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, Sonoma
western bumble bee	*Bombus occidentalis*	SC	Low	Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, Sonoma
California freshwater shrimp	*Syncaris pacifica*	FE, SE	Low	Guerneville, Larkfield, Graton, Glen Ellen, Penngrove
coho salmon - central California coast ESU	*Oncorhynchus kisutch pop. 4*	FE, SE	Low	Glen Ellen, Agua Caliente, Penngrove, Sonoma
steelhead – central California DPS	*Oncorhynchus mykiss irideus pop. 8*	FT	Low	Graton, Sonoma
California tiger salamander- Sonoma County DPS	*Ambystoma californiense pop. 3*	FT, ST	Low	Guerneville, Larkfield, Forestville, Graton, Glen Ellen, Agua Caliente, Petaluma, Sonoma
California red-legged frog	*Rana draytonii*	FT	Low	Geyserville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, Sonoma
tricolored blackbird	*Agelaius tricolor*	ST	Low	Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Sonoma

Common Name	Scientific Name	Status	Potential to Occur	BSA
Swainson's hawk	*Buteo swainsoni*	ST	Low	Geyserville, Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Sonoma
northern spotted owl	*Strix occidentalis cauring*	FT/ST	Low	Guerneville, Forestville
coho salmon – central California coast ESU	*Oncorhynchus kisutch pop. 4*	FE, SE	Moderate	Graton
steelhead – central California DPS	*Oncorhynchus mykiss irideus* pop. 8	FT	Moderate	Larkfield, Glen Ellen, Agua Caliente, Penngrove
foothill yellow-legged frog- north coast DPS	*Rana boylii pop. 1*	SC	Moderate	Guerneville, Larkfield, Penngrove
California red-legged frog	*Rana draytonii*	FT	Moderate	Guerneville
California tiger salamander- Sonoma County DPS	*Ambystoma californiense pop. 3*	FT, ST	High	Penngrove
California freshwater shrimp	*Syncaris pacifica*	FE, SE	Present	Agua Caliente
coho salmon - central California coast ESU	*Oncorhynchus kisutch pop. 4*	FE, SE	Present	Guerneville, Larkfield
steelhead – central California DPS	*Oncorhynchus mykiss irideus pop. 8*	FT	Present	Guerneville
California tiger salamander – Sonoma County DPS	*Ambystoma californiense pop. 3*	FT, ST	Present	Santa Rosa

Notes: ESU = Evolutionarily Significant Unit; FT = Federal Threatened; FE = Federal Endangered; ST = State Threatened; SE = State Endangered; SC = State Candidate

Source: Appendix BIO, Table 6

Nesting Birds

Non-game migratory birds protected under the California Fish and Game Code (CFGC) Section 3503 have the potential to breed throughout the BSA. Native avian species common to oak woodland, riparian and coastal scrub, grasslands, landscaping, developed and ruderal areas have the potential to breed and forage throughout the BSA. Species of birds common to the area that typically occur in the region, including red-tailed hawk, California quail, California scrub jay, black phoebe (*Sayornis nigricans*), Anna's hummingbird (*Calypte anna*), house finch (*Haemorhous mexicanus*), American crow, and turkey vulture, were detected from online database sources, including iNaturalist and eBird. Nesting by a variety of common birds protected by CFGC Section 3503 could occur in virtually any location throughout the BSA.

Sensitive Communities and Critical Habitat

SENSITIVE COMMUNITIES

Plant communities are considered sensitive biological resources if they have limited distribution, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance.

California Department of Fish and Wildlife (CDFW) ranks sensitive communities as "threatened" or "very threatened" and keeps records of their occurrences in California Natural Diversity Database (CNDDB). The following five sensitive natural communities are known to occur within 5 miles of the BSAs:

1. Northern Vernal Pool
2. Coastal and Valley Freshwater Marsh
3. Northern Hardpan Vernal Pool
4. Valley Needlegrass Grassland
5. Coastal Brackish Marsh

The vegetation communities mapped in the Santa Rosa and Penngrove BSAs include Western North America Vernal Pool, which may be considered sensitive as a wetland. Additionally, many of the specific vegetation alliances in the BSAs may be considered sensitive under CDFW's revised ranking methodology, including the *Populus fremontii* – Forest Alliance, many *Quercus* sp. alliances, and the *Sequoia sempervirens* Forest & Woodland Alliance.

CRITICAL HABITAT

The following eight federally designated critical habitats occur within 5 miles of the BSAs:

1. Marbled murrelet
2. Northern spotted owl
3. California tiger salamander (CTS)
4. California red-legged frog
5. Coho salmon – central California coast Evolutionarily Significant Unit (ESU)
6. Steelhead – central California DPS
7. Green sturgeon – southern DPS (*Acipenser medirostris*)
8. Chinook salmon – California coastal ESU (*Oncorhynchus tshawytscha*)

The BSAs distance in miles from each of the eight critical habitats is shown in Table 4.4-5 below. Critical habitat for CTS, coho salmon, and steelhead occur within some of the BSAs. Descriptions of each federally designated critical habitat are discussed in Appendix BIO.

Table 4.4-5 BSA Distance (miles) from Federally Designated Critical Habitats

BSA	Marbled Murrelet	Northern Spotted Owl	CTS	CRLF	Coho Salmon	Steelhead	Green Sturgeon	Chinook Salmon
Geyserville	–	–	–	–	1.94	0.88	–	0.38
Guerneville	0.88	–	–	–	Within	Within	–	–
Forestville	–	–	2.55	–	Within	0.16	–	–
Larkfield	–	–	0.31	–	Within	Within	–	–
Graton	–	–	1.45	–	Within	Within	–	–
Santa Rosa	–	–	Within	4.29	2.6	–	–	–
Penngrove	–	–	Within	3.22	–	0.09	–	–
Petaluma	–	–	2.98	0.97	–	1.02	2.75	–
Glen Ellen	–	–	–	3.26	–	Within	–	–
Agua Caliente	–	3.42	–	3.61	–	Within	–	–
Sonoma	–	4.01	–	–	–	0.11	–	–

Notes: CTS = California tiger salamander; CRLF = California red-legged frog

Jurisdictional Waters and Wetlands

Potentially jurisdictional areas in the BSA include streams located at various locations within the 11 Urban Service Areas. There are 10 streams in the 11 Urban Service Areas: Sonoma Creek, Green Valley Creek, Wood Creek, Calabazas Creek, Atascadero Creek, Fife Creek, Mark West Creek, Petaluma River, Fife Creek, and Lichau Creek (U.S. Geological Survey 2020). One freshwater pond is located in the Forestville BSA. There are no jurisdictional waters or wetlands within the Santa Rosa, Petaluma, or Sonoma BSAs. These features are potentially subject to U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), CDFW, and California Coastal Commission oversight. The lakes and many of the wetlands are permanently wet and have a direct hydrologic connection to the Pacific Ocean (a traditional navigable water as defined by USACE).

Wildlife Movement

Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations or those populations that are at risk of becoming isolated. Such linkages may serve a local purpose, such as providing a linkage between foraging and denning areas, or they may be regional in nature. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Others may be important as dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network. The California Essential Habitat Connectivity Project, commissioned by the California Department of Transportation and CDFW, identifies “natural Landscape Blocks” that support native biodiversity and the “Essential Connectivity Areas” which link them (Spencer et al. 2010).

Wildlife movement corridors can be both large and small in scale. Riparian corridors and waterways including the Russian River, Petaluma River, Wood Creek, Mark West Creek, Sonoma Creek, Atascadero Creek, Fife Creek, Green Valley Creek, Calabazas Creek, and Lichau Creek provide local scale opportunities for wildlife movement throughout the 11 BSAs. Existing trails and roads within the BSAs also act as corridors for wildlife movement, particularly for relatively disturbance-tolerant species such as red fox, coyote, raccoon, skunk, deer, and bobcat. On a larger scale, one of the 11

BSAs is mapped in an Essential Connectivity Area in the Biogeographic Information and Observation System (CDFW 2020). The Guerneville BSA is mapped within an Essential Connectivity Area connecting two natural land blocks, Armstrong Redwoods State Preserve at the northern extent and the Sonoma Coast State Park to the south along the coast. None of the other 10 BSAs are mapped in an Essential Connectivity Area or Natural Landscape Block. The Guerneville BSA is surrounded by a large area of undisturbed natural habitat, including woodland habitat in the southeastern portion of the BSA. Overall, this area represents important natural habitat for a wide range of species and supports genetic connectivity and movement along much of the northern California coast, including into the Mendocino National Forest. The Glen Ellen BSA lies outside a Natural Landscape Block, the Sonoma Valley Regional Park, approximately 0.2 mile south of the site.

There is potential for movement from local waterways, including the Russian River and Fife Creek in the Guerneville BSA, the Petaluma River and Lichau Creek in the Penngrove BSA, Wood Creek in the Geyserville BSA, Mark West Creek in the Larkfield BSA, Sonoma Creek in the Agua Caliente BSA, Green Valley Creek in the Forestville BSA, Sonoma Creek and Calabazas Creek in the Glen Ellen BSA, and Atascadero Creek in the Graton BSA. The riparian corridors of these waterways are a significant corridor for wildlife movement in Sonoma County. The areas surrounding the rivers and creek are primarily developed areas, including urban residential, commercial, and industrial development. Furthermore, most wildlife species that would utilize such connections are likely urban, disturbance tolerant species such as raccoon, skunk, opossum, and black tailed deer.

Developed areas of the BSA where Rezoning Sites would intersect an urban area do not function as essential connectivity areas or as important wildlife corridors due to previous use and disturbance.

4.4.2 Regulatory Setting

The following is a summary of the regulatory context under which biological resources are regulated at the federal, state, and local level. Agencies and regulatory documents pertaining to the protection of biological resources include:

1. U.S. Fish and Wildlife Service (USFWS; federally listed species and migratory birds)
2. USACE (wetlands and other waters of the U.S.)
3. CDFW (waters of the state, state-listed and fully protected species, and other sensitive plants and wildlife)
4. RWQCB (waters of the state)
5. Sonoma County General Plan (2016)
6. Sonoma County Code (Chapter 26D, *Heritage or Landmark Trees*; Chapter 26, Article 67, *Valley Oak Habitat Combining District*; Section 26-64)
7. Santa Rosa Plain Conservation Strategy (2005)

The following discussion provides a summary of those agencies and regulatory documents that are most relevant to biological resources.

a. Federal Regulations

U.S. Fish and Wildlife Service

The USFWS implements the Bald and Golden Eagle Protection Act (16 United States Code [USC] Sections 668-668d) and the Migratory Bird Treaty Act (MBTA, 16 USC Sections 703-712). The Bald

and Golden Eagle Protection Act prohibits the take of bald eagle and golden eagle without a permit. The MBTA prohibits killing, possessing, or trading in migratory birds, except in accordance with regulations prescribed by the Secretary of the Interior. This act encompasses whole birds, parts of birds, and bird nests and eggs. The USFWS shares responsibility for implementation of the Federal Endangered Species Act (FESA; 16 USC Section 1531) with the National Marine Fisheries Service (NMFS; National Oceanic and Atmospheric Administration [NOAA Fisheries]). USFWS generally implements the FESA for land and freshwater species, while NOAA Fisheries implements FESA for marine and anadromous species.

The FESA prohibits the unpermitted take of federally listed threatened or endangered species. Take under federal definition means to harass, harm (which includes habitat modification), pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Proposed or candidate species do not have the full protection of FESA; however, the USFWS and NOAA Fisheries advise project applicants that they could be elevated to listed status at any time.

Projects that would result in incidental take of any federally listed threatened or endangered species are required to obtain permits from the USFWS or NOAA Fisheries through either Section 7 (interagency consultation if there is a federal nexus) or Section 10 (incidental take permit/Habitat Conservation Plan [HCP]) of the FESA. The Section 7 consultation process, which applies to both listed animal and plant species, is designed to ensure that the federal agency action does not jeopardize the continued existence of a listed species or destroy or adversely modify its critical habitat. An HCP prepared under Section 10 outlines conservation measures to minimize the impacts of incidental take to listed species, including measures to maintain, enhance and protect the species' habitat.

U.S. Army Corps of Engineers

Under Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act, the USACE has authority to regulate activity that could discharge fill or dredge material or otherwise adversely modify wetlands or other waters of the U.S. Perennial and intermittent creeks and adjacent wetlands are considered waters of the U.S. and are within the regulatory jurisdiction of the USACE. The USACE implements the federal policy embodied in Executive Order (EO) 11990, which, when implemented, is intended to result in no net loss of wetland values or acres. In achieving the goals of the CWA, the USACE seeks to avoid adverse impacts and to offset unavoidable adverse impacts on existing aquatic resources. Any fill or adverse modification of wetlands or waters of the U.S would require a permit from the USACE prior to the start of work. Typically, permits issued by the USACE are a condition of a project as mitigation to offset unavoidable impacts on wetlands and other waters of the U.S. in a manner that achieves the goal of no net loss of wetland acres or values.

Under Section 404 of the CWA, the USACE has authority to regulate activity that could discharge fill or dredged material into wetlands or other waters of the U.S. Perennial and intermittent creeks and adjacent wetlands are considered waters of the U.S. and are within the regulatory jurisdiction of the USACE. The USACE implements the federal policy embodied in EO 11990, which, when implemented, is intended to result in no net loss of wetland values or acres. In achieving the goals of the CWA, the USACE seeks to avoid adverse impacts and to offset unavoidable adverse impacts on existing aquatic resources. Any fill waters of the U.S., including wetlands, would require a permit from the USACE prior to the start of work. In response to EO 13778, the USACE and U.S. Environmental Protection Agency (EPA) proposed a rule on December 11, 2018 to revise the definition of waters of the U.S. subject to federal regulation under the CWA. The proposed definition includes "traditional navigable waters, including the territorial seas; tributaries that

contribute perennial or intermittent flow to such waters; certain ditches; certain lakes and ponds; impoundments of otherwise jurisdictional waters; and wetlands adjacent to other jurisdictional waters." This new definition became effective on June 22, 2020. The USACE is expected to assert jurisdiction under Section 404 of the CWA over stream, lake, and wetland features to the ordinary high water mark, and to the edge of those wetlands with all three criteria that define federal wetlands: hydric soils, hydrophytic vegetation, and wetland hydrology.

b. State Regulations

California Department of Fish and Wildlife

CDFW derives its authority from the Fish and Game Code of California. The California Endangered Species Act (CESA) (Fish and Game Code Section 2050 et. seq.) prohibits take of State-listed threatened or endangered. Take under CESA is restricted to direct mortality of a listed species and the law does not prohibit indirect harm by way of habitat modification. Where incidental take would occur during construction or other lawful activities, CESA allows the CDFW to issue an Incidental Take Permit upon finding, among other requirements, that impacts to the species have been minimized and fully mitigated.

CFGC Sections 3503, 3503.5, and 3513 describe unlawful take, possession, or destruction of birds, nests, and eggs. Section 3503 prohibits the take of nests or eggs of any bird. Section 3503.5 protects all birds-of-prey and their eggs and nests against take. Section 3513 prohibits the take of migratory nongame birds as designated in the MBTA except as provided by the MBTA.

Species of Special Concern (SSC) is a category used by the CDFW for those species which are considered indicators of regional habitat changes or are considered potential future protected species. SSC do not have any special legal status except that which may be afforded by the CFGC as noted above. The SSC category is intended by the CDFW for use as a management tool to include these species into special consideration when decisions are made concerning the development of natural lands.

The CDFW also administers the California Native Plant Protection Act of 1977 (Fish and Game Code Section 1900 et seq.). The California Native Plant Protection Act prohibits importation of rare and endangered plants into California, "take" of rare and endangered plants, and sale of rare and endangered plants.

Perennial and intermittent streams and associated riparian vegetation, when present, also fall under the jurisdiction of the CDFW. Section 1600 et seq. of the CFGC (Lake and Streambed Alteration Agreements) gives the CDFW regulatory authority over work within the stream zone (which could extend on either side of the stream bank to the 100-year flood plain) consisting of, but not limited to, the diversion or obstruction of the natural flow or changes in the channel, bed, or bank of any river, stream, or lake.

Regional Water Quality Control Board

The State Water Resources Control Board (SWRCB) and the local RWQCB have jurisdiction over "waters of the State," pursuant to the Porter-Cologne Water Quality Control Act, which are defined as any surface water or groundwater, including saline waters, within the boundaries of the State. The SWRCB has issued general Waste Discharge Requirements (WDRs) regarding discharges to "isolated" waters of the State (Water Quality Order No. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the USACE to be

Outside of Federal Jurisdiction). The RWQCB administers actions under this general order for isolated waters not subject to federal jurisdiction, and is also responsible for the issuance of water quality certifications pursuant to Section 401 of the Clean Water Act for waters subject to federal jurisdiction.

c. Local Regulations

Sonoma County General Plan

The current Sonoma County General Plan contains the following goals and objectives related to biological resources:

Goal OSRC-7: Protect and enhance the County's natural habitats and diverse plant and animal communities.

Objective OSRC-7.1: Identify and protect native vegetation and wildlife, particularly occurrences of special status species, wetlands, sensitive natural communities, woodlands, and areas of essential habitat connectivity.

Objective OSRC-7.5: Maintain connectivity between natural habitat areas.

Objective OSRC-7.6: Establish standards and programs to protect native trees and plant communities.

Objective OSRC-7.7: Support use of native plant species and removal of invasive exotic species.

Objective OSRC-7.9: Preserve and restore the Laguna de Santa Rosa, San Pablo Bay and Petaluma marshes and other major marshes and wetlands

Policy OSRC-7k: Require the identification, preservation and protection of native trees and woodlands in the design of discretionary projects, and, to the maximum extent practicable, minimize the removal of native trees and fragmentation of woodlands, require any trees removed to be replaced, preferably on the site, and provide permanent protection of other existing woodlands where replacement planting does not provide adequate mitigation.

Policy OSRC-7l: Identify important oak woodlands, assess current protection, identify options to provide greater protection of oak woodlands and their role in connectivity, water quality and scenic resources, and develop recommendations for regulatory protection and voluntary programs to protect and enhance oak woodlands through education, technical assistance, easements and incentives.

Policy OSRC-7o: Encourage the use of native plant species in landscaping. For discretionary projects, require the use of native or compatible non-native species for landscaping where consistent with fire safety. Prohibit the use of invasive exotic species.

Goal OSRC-8: Protect and enhance Riparian Corridors and functions along streams, balancing the need for agricultural production, urban development, timber and mining operations, and other land uses with the preservation of riparian vegetation, protection of water resources, flood control, bank stabilization, and other riparian functions and values.

Objective OSRC-8.3: Recognize and protect riparian functions and values of undesignated streams during review of discretionary projects.

Policy OSRC-8e: Prohibit, except as otherwise allowed by Policy OSRC-8d, grading, vegetation removal, agricultural cultivation, structures, roads, utility lines, and parking lots within any streamside conservation area. Consider an exception to this prohibition if:

(1) It makes a lot unbuildable and vegetation removal is minimized,

(2) The use involves the minor expansion of an existing structure where it is demonstrated that the expansion will be accomplished with minimum damage to riparian functions,

(3) The use involves only the maintenance or restoration of an existing structure or a nonstructural use,

(4) It can be clearly demonstrated through photographs or other information that the affected area has no substantial value for riparian functions, or

(5) A conservation plan is approved that provides for the appropriate protection of the biotic resources, water quality, flood management, bank stability, groundwater recharge, and other applicable riparian functions. Until the County adopts mitigation standards and procedures for specific uses and riparian functions, prior to approving the conservation plan, consult on areas of concern with the Resource Conservation District, Agricultural Commissioner, and resource agencies that are applicable to the proposed plan.

Policy OSRC-8i**:** As part of the environmental review process, refer discretionary permit applications near streams to CDFG and other agencies responsible for natural resource protection.

Sonoma County Code

The Sonoma County Code Section 26D, *Heritage or Landmark Trees*, provides standards for the removal, protection, and preservation of trees. The ordinance requires a tree permit for any heritage or landmark tree to be removed or damaged during project construction. In addition to requiring tree removal permits, the ordinance also requires measures to protect existing trees during project construction. Sonoma County Zoning Code Article 88, Section 26-88-010(m), *Tree Protection Ordinance*, requires projects to be designed to minimize the removal of protected trees that meet size and species criteria specified in the ordinance, and replanting for trees removed.

Additionally, Article 67, *Valley Oak Habitat Combining District*, of the Sonoma County Zoning Code provides for protection and enhancement of oak woodland habitats. Removal of oak trees in this zoning district requires mitigation measures including retention of other oaks, replacement plantings, and/or an in-lieu fee.

Riparian corridors are protected by Article 65, *Riparian Corridor Combining Zone*. This combining zone protects County-designated streams, including the bed, bank, and adjacent streamside conservation areas as measured from the top of bank or the outer drip line of the riparian trees. Specific setbacks are determined based on the affected river or stream and site-specific conditions but generally include a 25- to 200-foot setback.

Santa Rosa Plain Conservation Strategy

The Larkfield BSA, Santa Rosa BSA, and portions of the Penngrove BSA are in the Santa Rosa Plain Conservation Strategy Area (2005). The goal of the Conservation Strategy is to aid in the conservation of listed species and vernal pools by providing local governments and developers a way to obtain authorization for incidental take of federally listed species for development. Species covered under the Conservation Strategy Area include CTS, Burke's goldfields, Sonoma sunshine, Sebastopol meadowfoam, and many-flowered navarretia.

4.4.3 Impact Analysis

a. Significance Thresholds

The following threshold criteria, as defined by the *CEQA Guidelines* Appendix G Checklist, were used to evaluate potential environmental effects. Based on these criteria, the proposed project would have a significant effect on biological resources if it would:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service
3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan

b. Methodology

The analysis presented in this section is based on literature/database reviews. Project impacts to flora and are focused upon rare, threatened, endangered species, as defined under *CEQA Guidelines* Section 15380. A substantial adverse effect as defined under Threshold 1 to federal- or state-listed, or fully protected species would be considered significant if any individual animal or plant would be affected. A substantial adverse effect as defined under Threshold 1 to CRPR 1B and 2B plants are generally considered significant under CEQA if the loss of individuals on represented a population-level impact that resulted in a loss of a local or regional population, or risked the long-term viability of a local or regional population.

Definition of Special Status Species

For the purposes of this analysis, special status species include:

1. Species listed as threatened or endangered under the FESA; species that are under review may be included if there is a reasonable expectation of listing within the life of the project
2. Species listed as candidate, threatened, or endangered under the CESA
3. Species designated as Fully Protected, SSC, or Watch List by CDFW
4. Species designated as sensitive by the U.S. Forest Service or Bureau of Land Management, if the project would affect lands administered by these agencies

5. Species designated as locally important by the Local Agency and/or otherwise protected through ordinance or local policy
6. Species designated with a CRPR of 1B or 2B

Environmental Statutes

For the purpose of this analysis, potential impacts to biological resources were analyzed based on the following statutes (Appendix BIO):

1. California Environmental Quality Act (CEQA)
2. FESA
3. CESA
4. Federal CWA
5. CFGC Section 3503
6. MBTA
7. The Bald and Golden Eagle Protection Act
8. Porter-Cologne Water Quality Control Act
9. Santa Rosa Plain Conservation Strategy Area
10. Sonoma County Code
11. Sonoma County General Plan (2016)

c. Project Impacts and Mitigation Measures

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

Impact BIO-1 FUTURE DEVELOPMENT FACILITATED BY THE PROJECT COULD IMPACT SPECIAL STATUS SPECIES AND THEIR HABITAT DURING CONSTRUCTION AND/OR OPERATION. IMPACTS WOULD BE SIGNIFICANT AND MITIGATION MEASURES WOULD BE REQUIRED.

A total of 160 special status plants and 62 special status animals are known to occur or have the potential to occur in the BSAs. Of these, 78 special status plants have the potential to occur in the BSAs, of which 25 are state or federally listed. There are 36 special status animal species with some potential to occur in the BSAs, including 19 federally or state-listed species (Appendix BIO).

Development facilitated by the project would include both redevelopment of existing urban structures and loss of undeveloped habitat. Construction-related disturbances may also occur at staging areas and access corridors. These activities could result in significant impacts to special status species through injury or mortality from construction activity. Additionally, construction in the immediate vicinity of creeks or streams could result in loss or degradation of aquatic habitat (e.g., by erosion, sedimentation, pollution, or tampering by the public).

Impacts to CRPR 1B.1 or 1B.2 plant species would only be considered significant if the loss of individuals in the BSAs represented a population-level impact that resulted in a loss of or risk to the entire regional population. Given the size of the BSAs, quality of habitat, and small impact area for the types of projects proposed (i.e., re-development of the Rezoning Sites), there is low potential for

impacts on a population level. Impacts to individuals of state and federally listed species, or population-level adverse effects to non-listed species would be considered significant but can be reduced through the design of project elements to avoid special status plants and sensitive vegetation communities. Impacts to federally or state-listed species from ground-disturbing activity or vegetation removal would be considered significant.

Special status animal species are most likely to occur in native vegetation communities and natural habitats in the BSAs, but many species may use more disturbed areas as upland or foraging habitat and may occur transiently in the BSAs. Impacts to special status animal species could occur if individuals were present in the BSA at the time of construction through direct injury or mortality. Disturbance may also occur because of construction noise and human presence. Development facilitated by the project may also decrease available foraging habitat for some special status birds. These impacts would be considered significant.

Given that most of the BSAs are in medium or low density residential and rural areas, impacts are expected to be low, but development facilitated by the project would require ground disturbance or vegetation removal have potential to adversely affect special status species wherever they occur in the BSAs. Avoidance and minimization measures can be applied for a variety of species to reduce the potential impact to less than significant. For development facilitated by the project that is not expected to result in any ground disturbance or very small disturbance (e.g., installation of signage, utility improvements that do not involve ground disturbance outside of paved areas, etc.) and no vegetation removal, no mitigation would be required. For those projects that would result in ground disturbance through clearing/grading or vegetation trimming or removal (e.g., demolition of existing buildings and redevelopment construction, etc.), a project-specific biological assessment (Mitigation Measure BIO-1) would be required. Additional mitigation measures would then be required based on the results of the project-specific biological analysis and may include one or more of the measures outlined below (Mitigation Measures BIO-2 through BIO-12) to reduce the impact to less than significant.

Mitigation Measures

BIO-1 BIOLOGICAL RESOURCES SCREENING AND ASSESSMENT

For projects in the BSAs that would require ground disturbance through clearing/grading or vegetation trimming, the project applicant shall engage a qualified biologist (having the appropriate education and experience level) to perform a preliminary Biological Resources Screening and Assessment to determine whether the project has any potential to impact special status biological resources, inclusive of special status plants and animals, sensitive vegetation communities, jurisdictional waters (including creeks, drainages, streams, ponds, vernal pools, riparian areas and other wetlands), critical habitat, wildlife movement area, or biological resources protected under regional (County) ordinances or an existing Habitat Conservation Plan (HCP) or Natural Community Conservation Plan, including the Santa Rosa Plain Conservation Strategy. If it is determined that the project has no potential to impact biological resources, no further action is required. If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 500 feet around the project footprint, and to determine the potential impacts to those resources. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, state, and/or federal agencies. If the project would

have the potential to impact these resources, the following mitigation measures (Mitigation Measures BIO-2 through BIO-12) shall be incorporated, as applicable, to reduce impacts to a less than significant. Pending the results of the project-specific biological analysis, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, NMFS, CDFW, and/or other local, state, and federal agencies may be required. Note that specific surveys described in the mitigation measures below may be completed as part of the project-specific biological analysis where suitable habitat is present.

BIO-2 SPECIAL STATUS PLANT SPECIES SURVEYS

If the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) determines that there is potential for significant impacts to federally or state-listed plants or regional population level impacts to species with a CRPR of 1B or 2B from project development, a qualified biologist shall complete surveys for special status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species identified in the project-specific biological analysis. All plant surveys shall be conducted by a qualified biologist during the blooming season prior to initial ground disturbance. All special status plant species identified on site shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the County, and the CDFW and/or USFWS, as appropriate, for review and/or approval.

BIO-3 SPECIAL STATUS PLANT SPECIES AVOIDANCE, MINIMIZATION, AND MITIGATION

If federally and/or state-listed or CRPR 1B or 2 species are found during special status plant surveys (pursuant to Mitigation Measure BIO-2), and would be directly impacted, or there would be a population-level impact to non-listed sensitive species, then the project shall be re-designed to avoid impacting those plant species. Rare and listed plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm.

For projects in BSAs located within the Santa Rosa Plain Area, protocol rare plant surveys shall be conducted, and impacts to suitable rare plant habitat mitigated, in accordance with the 2007 USFWS Santa Rosa Plain Programmatic Biological Opinion, as amended in 2020.

BIO-4 RESTORATION AND MONITORING

Development and/or restoration activities shall be conducted in accordance with a site-specific Habitat Restoration Plan. If federally or state-listed plants or non-listed special status CRPR 1B and 2 plant populations cannot be avoided, and will be impacted by development, all impacts shall be mitigated by the applicant at a ratio not lower than 1:1 and to be determined by the County (in coordination with CDFW and USFWS as and if applicable) for each species as a component of habitat restoration. A qualified biologist shall prepare and submit a restoration plan to the County for review and approval. (Note: if a federally and/or state-listed plant species will be impacted, the restoration plan shall be submitted to the USFWS and/or CDFW for review, and federal and/or state take authorization may be required by these agencies.) The restoration plan shall include, at a minimum, the following components:

1. Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type)
2. Goal(s) of the compensatory mitigation project (type[s] and area[s]) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type[s] to be established, restored, enhanced, and/or preserved)
3. Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions, and values)
4. Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan)
5. Maintenance activities during the monitoring period, including weed removal as appropriate (activities, responsible parties, schedule)
6. Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports)
7. Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of container plants and 30 percent relative cover by vegetation type or other industry standards as determined by a qualified restoration specialist
8. An adaptive management program and remedial measures to address any shortcomings in meeting success criteria
9. Notification of completion of compensatory mitigation and agency confirmation
10. Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism)

BIO-5 Endangered/Threatened Species Habitat Assessments and Protocol Surveys

Specific habitat assessments and survey protocols are established for several federally- and state-listed endangered or threatened species. If the results of the project-specific biological analysis determine that suitable habitat may be present for any such species, protocol habitat assessments/surveys shall be completed in accordance with CDFW, NMFS, and/or USFWS protocols prior to issuance of any construction permits. If projects are located within the Santa Rosa Plain Area, surveys shall be conducted for CTS in accordance with the Santa Rosa Plain Conservation Strategy (2005). If through consultation with the CDFW, NMFS, and/or USFWS it is determined that protocol habitat assessments/surveys are not required, the applicant shall complete and document this consultation and submit it to the County prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they understand the protocol requirements and shall hire a qualified biologist to conduct protocol surveys.

BIO-6 Endangered/Threatened Animal Species Avoidance and Minimization

The following measures shall be applied to aquatic and/or terrestrial animal species as determined by the project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1.

1. Ground disturbance shall be limited to the minimum necessary to complete the project. A qualified biologist shall flag the project limits of disturbance. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance.

2. All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and October 31 to avoid impacts to sensitive aquatic species. Any work outside these dates would require project-specific approval from the County and may be subject to regulatory agency approval.
3. All projects occurring within or adjacent to sensitive habitats that may support federally and/or state-listed endangered/threatened species shall have a CDFW- and/or USFWS-approved biologist present during all initial ground disturbing/vegetation clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed, said biologist shall conduct daily pre-activity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the CDFW, NMFS, and/or USFWS, said biologist may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are fully implemented.
4. No endangered/threatened species shall be captured and relocated without express permission from the CDFW, NMFS, and/or USFWS.
5. If at any time during project construction an endangered/threatened species enters the construction site or otherwise may be impacted by the project, all project activities shall cease. A CDFW/USFWS-approved biologist shall document the occurrence and consult with the CDFW and USFWS, as appropriate, to determine whether it was safe for project activities to resume.
6. For all projects occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete.
7. All vehicle maintenance/fueling/staging shall occur not less than 100 feet from any riparian habitat or water body, including seasonal wetland features. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies.
8. No equipment shall be permitted to enter wetted portions of any affected drainage channel.
9. If project activities could degrade water quality, water quality sampling shall be implemented to identify the pre-project baseline, and to monitor during construction for comparison to the baseline.
10. If water is to be diverted around work sites, the applicant shall submit a diversion plan (depending upon the species that may be present) to the CDFW, RWQCB, USFWS, and/or NMFS for their review and approval prior to the start of any construction activities (including staging and mobilization). If pumps are used, all intakes shall be completely screened with wire mesh not larger than five millimeters to prevent animals from entering the pump system.
11. At the end of each workday, excavations shall be secured with cover or a ramp provided to prevent wildlife entrapment.
12. All trenches, pipes, culverts, or similar structures shall be inspected for animals prior to burying, capping, moving, or filling.

13. The CDFW/USFWS-approved biologist shall remove invasive aquatic species such as bullfrogs and crayfish from suitable aquatic habitat whenever observed and shall dispatch them in a humane manner and dispose of properly.
14. Considering the potential for projects to impact federally and state-listed species and their habitat, the applicant shall contact the CDFW and USFWS to identify mitigation banks within Sonoma County during project development. If the results of the project-specific biological analysis (Mitigation Measure BIO-1) determine that impacts to federally and state threatened or endangered species habitat are expected, the applicant shall explore species-appropriate mitigation bank(s) servicing the region for purchase of mitigation credits. If projects are located within the Santa Rosa Plain Area, mitigation for impacts to CTS shall be implemented in accordance with the Santa Rosa Plain Conservation Strategy (2005).
15. For projects occurring in the Petaluma BSA (PET-1 through PET-4), prior to grading and construction in natural areas of containing suitable upland habitat, a qualified biologist shall conduct a preconstruction survey for CTS. The survey shall include a transect survey over the entire project disturbance footprint (including access and staging areas), and mapping of burrows that are potentially suitable for salamander occupancy. If any CTS are detected, no work shall be conducted until the individual leaves the site of their own accord, unless federal and state "take" authorization has been issued for CTS relocation. Typical preconstruction survey procedures, such as burrow scoping and burrow collapse, cannot be conducted without federal and state permits. If any life stage of CTS is found within the survey area, the applicant shall consult with the USFWS and CDFW to determine the appropriate course of action to comply with the FESA and CESA, if permits are not already in place at the time of construction.

BIO-7 Non-Listed Special Status Animal Species Avoidance and Minimization

The project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) shall identify some or all the below measures that will be required and applicable to the individual project:

1. For non-listed special status terrestrial amphibians and reptiles, a qualified biologist shall complete coverboard surveys within 14 days of the start of construction. The coverboards shall be at least four feet by four feet and constructed of untreated plywood placed flat on the ground as determined by the project-specific biological assessment (pursuant Mitigation Measure BIO-1). The qualified biologist shall check the coverboards once per week for each week after placement up until the start of vegetation removal. The biologist shall capture all non-listed special status and common animals found under the coverboards and shall place them in five-gallon buckets for transportation to relocation sites. The qualified biologist shall review all relocation sites and those sites shall consist of suitable habitat. Relocation sites shall be as close to the capture site as possible but far enough away to ensure the animal(s) is not harmed by project construction. Relocation shall occur on the same day as capture. The biologist shall submit CNDDB Field Survey Forms to the CFDW for all special status animal species observed.
2. Prior to construction, a qualified biologist shall conduct a survey of existing buildings to determine if bats are present. The survey shall be conducted during the non-breeding season (November through March). The biologist shall have access to all structures and interior attics, as needed. If a colony of bats is found roosting in any structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.).

3. If bats are roosting in the building during the daytime but are not part of an active maternity colony, then exclusion measures must include one-way valves that allow bats to get out but are designed so that the bats may not re-enter the structure. Maternal bat colonies shall not be disturbed.
4. A qualified biologist shall conduct pre-construction clearance surveys within 14 days of the start of construction (including staging and mobilization). The surveys shall cover the entire disturbance footprint plus a minimum 200-foot buffer, and shall identify all special status animal species that may occur on-site. All non-listed special status species shall be relocated from the site either through direct capture or through passive exclusion. The biologist shall submit a report of the pre-construction survey to the County for their review and approval prior to the start of construction.
5. A qualified biologist shall be present during all initial ground-disturbing activities, including vegetation removal to recover special status animal species unearthed by construction activities.
6. Project activities shall be restricted to daylight hours.
7. Upon completion of the project, a qualified biologist shall prepare a Final Compliance Report documenting all compliance activities implemented for the project, including the pre-construction survey results. The report shall be submitted to the County within 30 days of completion of the project.
8. If special status bat species may be present and impacted by the project, a qualified biologist shall conduct, within 30 days of the start of construction, presence/absence surveys for special status bats in consultation with the CDFW where suitable roosting habitat is present. Surveys shall be conducted using acoustic detectors and by searching tree cavities, crevices, and other areas where bats may roost. If active roosts are located, exclusion devices such as netting shall be installed to discourage bats from occupying the site. If a qualified biologist determines a roost is used by a large number of bats (large hibernaculum), bat boxes shall be installed near the project site. The number of bat boxes installed will depend on the size of the hibernaculum and shall be determined through consultation with CDFW. If a maternity colony has become established, all construction activities shall be postponed within a 500-foot buffer around the maternity colony until it is determined by a qualified biologist that the young have dispersed. Once it has been determined that the roost is clear of bats, the roost shall be removed immediately.

BIO-8 Western Pond Turtle Avoidance and Minimization

For projects located in the Penngrove BSA (PEN-1 through PEN-9), a qualified biologist shall conduct pre-construction clearance surveys for western pond turtle within 14 days prior to the start of construction (including staging and mobilization) in areas of suitable habitat. The biologist shall flag limits of disturbance for each construction phase. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance. If western pond turtles are observed, they shall be allowed to leave the site on their own.

BIO-9 American Badger Avoidance and Minimization

For projects located in the Petaluma BSA (PET-1 through PET-4), a qualified biologist shall conduct surveys of the grassland habitat on-site to identify any American badger burrows/dens. These surveys shall be conducted not more than 14 days prior to the start of construction. Impacts to

active badger dens shall be avoided by establishing exclusion zones around all active badger dens, within which construction related activities shall be prohibited until denning activities are complete or the den is abandoned. A qualified biologist shall monitor each den once per week in order to track the status of the den and to determine when a den area has been cleared for construction.

BIO-10 PRE-CONSTRUCTION SURVEYS FOR NESTING BIRDS FOR CONSTRUCTION OCCURRING WITHIN NESTING SEASON

For projects that require the removal of trees or vegetation, construction activities shall occur outside of the nesting season (September 16 to January 31), and no mitigation activity is required. If construction activities must occur during the nesting season (February 1 to September 15), a qualified biologist shall conduct surveys for nesting birds covered by the CGFC no more than 14 days prior to vegetation removal. The surveys shall include the entire disturbance area plus a 200-foot buffer around the site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of 50 feet for non-raptor bird species and at least 150 feet for raptor species. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. The biologist shall submit a report of these preconstruction nesting bird surveys to the County to document compliance within 30 days of its completion.

BIO-11 WORKER ENVIRONMENTAL AWARENESS PROGRAM

If potential impacts to special status species are identified in the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), prior to initiation of construction activities (including staging and mobilization), all personnel associated with project construction shall attend Worker Environmental Awareness Program training, conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the BSAs for the project. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of projects. All employees shall sign a form documenting provided by the trainer indicating they have attended the Worker Environmental Awareness Program and understand the information presented to them. The form shall be submitted to the County to document compliance.

BIO-12 INVASIVE WEED PREVENTION AND MANAGEMENT PROGRAM

For those projects where activity would occur within or adjacent to sensitive habitats, as determined by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), prior to start of construction a qualified biologist shall develop an Invasive Weed Prevention and Management Plan to prevent invasion of native habitat by non-native plant species. A list of target species shall be included, along with measures for early detection and eradication. All disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas. In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six weeks since ground disturbing activities ceased. If

exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a qualified biologist and in accordance with the restoration plan. Landscape species shall not include noxious, invasive, and/or non-native plant species that are recognized on the federal Noxious Weed List, California Noxious Weeds List, and/or California Invasive Plant Council Moderate and High Risk Lists.

Significance After Mitigation

Implementation of Mitigation Measures BIO-1 through BIO-12 would reduce potential impacts to special status species to less than significant levels by requiring a Biological Resources Screening and Assessment for future development on Rezoning Sites that would require ground disturbance through clearing/grading or vegetation trimming. Following this Biological Resources Screening and Assessment, special status plant surveys, habitat assessments and protocol surveys, nesting bird pre-construction surveys, avoidance and minimization measures, restoration and monitoring, worker training, and invasive weed management may also be required.

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

Impact BIO-2 FUTURE DEVELOPMENT FACILITATED BY THE PROJECT COULD IMPACT RIPARIAN HABITAT OR SENSITIVE NATURAL COMMUNITIES DURING CONSTRUCTION AND/OR OPERATION. IMPACTS WOULD BE SIGNIFICANT AND MITIGATION MEASURES WOULD BE REQUIRED.

Sensitive natural communities known to occur within the BSA which may be impacted by development facilitated by the project include riparian and vernal pool habitat and riparian corridors protected by the Sonoma County zoning ordinance (Section 26-65). Other natural communities included in the California Sensitive Natural Communities List are also likely to be present in the BSAs but have not been mapped on a broad scale. Additionally, federally designated critical habitat units for steelhead, coho salmon, and CTS occur in the BSAs and may be affected by the project. Direct impacts to sensitive habitats and critical habitats could occur through direct conversion of habitats to development. Projects facilitated by rezoning with potential to adversely affect sensitive or critical habitat are those projects that would include ground disturbance or vegetation removal adjacent to critical habitat in the Guerneville, Larkfield, Forestville, Graton, Santa Rosa, Glen Ellen, Penngrove, and Petaluma BSAs. Development facilitated by the project would be required to comply with existing County standards and processes, including Section 26-65 protecting riparian corridors. However, significant indirect impacts could also occur through the establishment of non-native invasive species, and mitigation measures would be required.

Mitigation Measures

BIO-13 SENSITIVE NATURAL COMMUNITY AVOIDANCE

If sensitive natural communities are identified through the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), the project shall be designed to avoid those communities to the maximum extent possible and all project elements associated with development shall be situated outside of sensitive habitats. Bright orange protective fencing installed at least 30 feet beyond the extent of the sensitive natural community during construction, or other distance as approved by a qualified biologist, to protect them from harm.

BIO-14 RESTORATION FOR IMPACTS TO SENSITIVE NATURAL COMMUNITIES

Impacts to sensitive natural communities (including riparian areas and waters of the state or waters of the U.S. under the jurisdiction of the CDFW, USFWS or RWQCB) shall be mitigated through the funding of the acquisition and in-perpetuity management of similar habitat. The applicant shall provide funding and management of off-site mitigation lands through purchase of credits from an existing, approved mitigation bank or land purchased by the County and placed into a conservation easement or other covenant restricting development (e.g., deed restriction). Internal mitigation lands (internal to the Rezoning Sites), or in lieu funding sufficient to acquire lands, shall provide habitat at a minimum 1:1 ratio for impacted lands, comparable to habitat to be impacted by individual project activity. The applicant shall submit documentation of mitigation funds to the County.

1. **Restoration and Monitoring.** If sensitive natural communities cannot be avoided and will be impacted by future projects, a compensatory mitigation program shall be implemented by the applicant in accordance with Mitigation Measure BIO-4 and the measures set forth by the regulatory agencies during the permitting process. All temporary impacts to sensitive natural communities shall be fully restored to natural condition.
2. **Sudden Oak Death.** The applicant shall inspect all nursery plants used in restoration for sudden oak death. Vegetation debris shall be disposed of properly and vehicles and equipment shall be free of soil and vegetation debris before entering natural habitats. Pruning tools shall be sanitized.

Significance After Mitigation

Implementation of Mitigation Measures BIO-13 and BIO-14 would reduce potential impacts to riparian habitats or sensitive natural communities to less than significant levels by requiring avoidance of sensitive natural communities where such communities are identified during implementation of Mitigation Measure BIO-1, and by requiring restoration and monitoring of sensitive natural communities.

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

Impact BIO-3 FUTURE DEVELOPMENT FACILITATED BY THE PROJECT COULD IMPACT JURISDICTIONAL STATE OR FEDERALLY PROTECTED WETLANDS DURING CONSTRUCTION AND/OR OPERATION. IMPACTS WOULD BE SIGNIFICANT AND MITIGATION MEASURES WOULD BE REQUIRED.

Wetlands and waters cross many of the BSAs and may be affected by development facilitated by the project that would occur within the limits of, or adjacent to, jurisdictional waters. The project is not expected to directly impact jurisdictional features but development facilitated by the project may result in runoff from construction sites or unintentional spills. There are eight creeks located within the BSAs: Sonoma Creek, Green Valley Creek, Wood Creek, Atascadero Creek, Mark West Creek, Lichau Creek, Fife Creek, and Calabazas Creek. In addition, vernal pool habitat was mapped at the Penngrove and Santa Rosa BSAs. These wetlands and non-wetland waters may be subject to USACE jurisdiction under the CWA, RWQCB jurisdiction under the CWA and Porter-Cologne, and CDFW jurisdiction under the CFGC. Because of the programmatic nature of the project, a precise, project-level analysis of the specific impacts associated with individual projects on potential wetlands is not possible at this time and site-specific analysis is needed to verify if wetlands are present. If

development facilitated by the project would impact wetlands, the development would either be designed to avoid impacts to federal and state waters or would be subject to Mitigation Measure BIO-15. If, based on the results of the jurisdictional delineation, it is determined that project activity would result in either direct or indirect impacts to waters of the state or waters of the U.S., then Mitigation Measure BIO-16 would be required to ensure no net loss of wetlands functions and ensure impacts to waters of the state or waters of the U.S. are less than significant.

Mitigation Measures

BIO-15 JURISDICTIONAL DELINEATION

If potentially jurisdictional wetlands are identified by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), a qualified biologist shall complete a jurisdictional delineation. The jurisdictional delineation shall determine the extent of the jurisdiction for CDFW, USACE, and/or RWQCB, and shall be conducted in accordance with the requirement set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the County, USACE, RWQCB, and CDFW, as appropriate, for review and approval. Jurisdictional areas shall be avoided to the maximum extent possible. If jurisdictional areas are expected to be impacted, then the RWQCB would require a Waste Discharge Requirement permit and/or Section 401 Water Quality Certification (depending upon whether the feature falls under federal jurisdiction). If CDFW asserts its jurisdictional authority, then a Lake or Streambed Alteration Agreement pursuant to Section 1600 et seq. of the CFGC would also be required prior to construction within the areas of CDFW jurisdiction. If the USACE asserts its authority, then a permit pursuant to Section 404 of the CWA would be required. Furthermore, a compensatory mitigation program shall be implemented by the applicant in accordance with Mitigation Measure BIO-4 and the measures set forth by the regulatory agencies during the permitting process. Compensatory mitigations for all permanent impacts to waters of the U.S. and waters of the state shall be completed at a ratio as required in applicable permits. All temporary impacts to waters of the U.S. and waters of the state shall be fully restored to natural condition.

BIO-16 GENERAL AVOIDANCE AND MINIMIZATION

Projects shall be designed to avoid potential jurisdictional features identified in jurisdictional delineation reports. Projects that may impact jurisdictional features shall provide the County with a report detailing how all identified jurisdictional features will be avoided, including groundwater draw down.

1. Any material/spoils generated from project activities shall be located away from jurisdictional areas or special status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls (non- monofilament), covers, sand/gravel bags, and straw bale barriers, as appropriate.
2. Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank.
3. Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative will be notified.

Significance After Mitigation

Implementation of Mitigation Measures BIO-15 and BIO-16 would reduce potential impacts to federally or state-protected wetlands to less than significant levels by requiring a jurisdictional delineation be conducted on sites where wetlands are identified during implementation of Mitigation Measure BIO-1, and by requiring avoidance and minimization measures where jurisdictional features may be affected by development.

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

Impact BIO-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT IMPACT WILDLIFE MOVEMENT DUE TO THE LOCATION OF THE REZONING SITES IN AREAS OF EXISTING DEVELOPMENT. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Guerneville BSA is mapped in an Essential Connectivity Area connecting two natural land blocks; however, the development facilitated by the project would occur in the community of Guerneville in a largely developed area that does not function as a corridor for movement. The remaining BSAs are also located in rural/residential areas with varying degrees of existing development. Additionally, development facilitated by the project would not affect the function of creeks and riparian areas in the BSAs as local corridors for wildlife movement; therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact BIO-5 DEVELOPMENT FACILITATED BY THE PROJECT WOULD BE SUBJECT TO THE COUNTY'S ORDINANCES AND REQUIREMENTS PROTECTING BIOLOGICAL RESOURCES, SUCH AS TREES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The 59 Rezoning Sites would fall under the jurisdiction of Sonoma County, which provides protection for biological resources through the implementation of its General Plan and Zoning Code.

The Sonoma County General Plan 2020 (County of Sonoma 2008) includes policies to guide decisions on future growth, development, and conservation of resources through 2020. This includes the Open Space and Resource Conservation Elements which aims to preserve natural and scenic resources.

The Sonoma County Zoning Code Chapter 26D and Sonoma County Zoning Code Article 88, Section 26-88-010(m), *Tree Protection Ordinance*, provides for the protection of heritage and landmark trees. Article 67, *Valley Oak Habitat Combining District*, of the Sonoma County Zoning Code provides protection for oak woodland habitats, and Article 65, *Riparian Corridor Combining Zone*, of the Sonoma County Zoning Code provides protection for riparian corridors.

Trees to be removed have not yet been identified because individual projects have not been developed yet; however, development facilitated by the project would potentially require some tree removal, which would be determined during the project's application process. Additionally, some loss of habitat and biological resources is expected. Development facilitated by the project would be required to comply with these goals policies and measures, including via the application for tree removal permits and compliance with associated requirement (e.g., tree replacement) where applicable. Compliance with these regulations would reduce impacts to less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact BIO-6 DEVELOPMENT FACILITATED BY THE PROJECT WITHIN THE SANTA ROSA PLAIN CONSERVATION STRATEGY AREA COULD CONFLICT WITH THE PLAN. IMPACTS WOULD BE SIGNIFICANT AND REQUIRE MITIGATION.

The Larkfield BSA, Santa Rosa BSA, and portions of the Penngrove BSA are located within the Santa Rosa Plain Conservation Strategy Area (2005). The Larkfield BSA is located outside the Windsor Urban growth boundary, to the south. The Santa Rosa BSA is located at the southern end of the Santa Rosa urban growth boundary, with some edges outside the boundary. The western half of the Penngrove BSA is within the Conservation Strategy Area outside of the Cotati urban growth boundary, to the south. The Conservation Strategy urban growth boundaries were designed to limit development in natural habitats and focus future growth within previously developed areas. The Conservation Strategy does allow for some development outside of the urban growth boundaries as long as it does not change land use appreciably, and impacts are adequately mitigated. Because the Rezoning Sites are individually small and most of the BSAs would remain under the current agricultural, residential, commercial, and industrial zoning, the project would not likely to change land use appreciably and could be sufficiently mitigated in accordance with the Sonoma County General Plan (refer to Section 4.4.2[c] and Impacts BIO-1 through BIO-5 for mitigation measures that are consistent with the General Plan).

The USFWS has issued a programmatic Biological Opinion (BO) to the USACE for projects that may affect listed species on the Santa Rosa Plain (1998; updated 2007). In 2016 USFWS issued the Santa Rosa Plain Recovery Plan to provide a framework for the recovery of CTS, Burke's goldfields, Sonoma sunshine, and Sebastopol meadowfoam (USFWS 2016). If development facilitated by the project would affect listed species in the Santa Rosa Plain there would be the potential for conflict with these plans and conservation strategies. This would be a significant impact and would require mitigation measures.

Mitigation Measure

BIO-17 CONSISTENCY WITH THE SANTA ROSA PLAIN CONSERVATION STRATEGY

For Rezoning Sites SAN-1 through SAN-10, the Biological Resources Screening and Assessment (Mitigation Measure BIO-1) shall assess projects for impacts to listed species included in the Santa Rosa Plain Conservation Strategy. Impacts to these species shall be evaluated and mitigated per the mitigation measures included in Chapter 5 of the Conservation Strategy.

Significance After Mitigation

Implementation of Mitigation Measure BIO-17 would reduce impacts resulting from conflicts with the provisions of the Santa Rosa Plain Conservation Strategy to less than significant levels by ensuring the Biological Resources Screening and Assessment conducted for Mitigation Measure BIO-1 on Rezoning Sites SAN-1 through SAN-10 also includes an assessment of the Santa Rosa Plain Conservation Strategy.

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4.5 Cultural Resources

The analysis in this section has been prepared in accordance with *CEQA Guidelines* Section 15064.5 and considers potential impacts to archaeological, historic, and paleontological resources. This section includes a summary of cultural resources background information and a review of known archaeological and built environment resources; it also discusses the proposed project's potential impacts on these resources. Potential impacts to tribal resources are addressed in Section 4.17, *Tribal Cultural Resources*.

4.5.1 Setting

Pre-European Contact History

During the twentieth century, many archaeologists developed chronological sequences to explain prehistoric cultural changes within all or portions of northern California (c.f., Jones and Klar 2007: 308-312; Moratto 1984: 248-250). Sonoma County is situated in portions of the North Coast archaeological region and the San Francisco Bay archaeological region (Moratto 1984). Following Milliken et al. (2007:101-103), the prehistoric cultural chronology for the region can be generally divided into five periods: the Early Holocene (8,000 to 3,500 BCE), Early Period (3,500 to 600 BCE), Lower Middle Period (500 BCE to 430 CE), the Upper Middle Period (430 to 1050 CE), and the Late Period (1050 CE to European contact).

It is presumed that early Paleoindian groups lived in the area prior to 8,000 BCE but, no evidence that supports this assumption has been discovered in the area to date (Milliken et al. 2007:114). Because sea level was much lower prior to 8,000 BCE, it is likely that any such sites may now be underwater. For this reason, the terminal Pleistocene to earliest Holocene Period (ca. 11,700-8,000 BCE) is not discussed here.

EARLY HOLOCENE (8,000- 3,500 BCE)

The Early Holocene in the North Coast and Bay Area is characterized by a mobile forager pattern and the presence of millingslabs, handstones, and a variety of leaf-shaped projectile points, though evidence that dates to this period is limited. It is likely that Holocene alluvial deposits buried many prehistoric sites in the area (Ragir 1972; Moratto 1984).

EARLY PERIOD (3,500- 600 BCE)

The Early Period saw increased sedentism from the Early Holocene as indicated by new ground stone technologies (introduction of the mortar and pestle), an increase in regional trade, and the earliest cut-bead horizon. A shift to a sedentary or semi-sedentary lifestyle is marked by the prevalence of mortars and pestles, ornamental grave associations, and shell mounds. By 1,500 BCE, mortars and pestles had almost completely replaced millingslabs and handstones. The earliest cut bead horizon that dates to this period is represented by rectangular *Haliotis* (abalone) and *Olivella* (snail) beads from several sites (Milliken et al. 2007:114-115). The advent of the mortar and pestle indicates a greater reliance on processing nuts such as acorns. Faunal evidence from various sites suggests a diverse diet of mussel and other shellfish, marine mammals, terrestrial mammals, and birds (D'Oro 2009).

LOWER MIDDLE PERIOD (500 BCE -430 CE)

The Lower Middle Period saw numerous changes from the previous period. Rectangular shell beads, common during the Early Period, disappear completely and are replaced by split-beveled and saucer *Olivella* beads. In addition to the changes in beads, *Haliotis* ornaments, bone tools and ornaments, and basketry awls that indicate coiled basket manufacture appear. Mortars and pestles continue to be the dominant grinding tool (Milliken et al. 2007:115). Evidence for the Lower Middle Period in the San Francisco Bay Area comes from sites such as the Emeryville shell mound (ALA-309) and Ellis Landing (CCO-295). ALA-309 is one of the largest shell mounds in the Bay Area and contains multiple cultural sequences. The lower levels of the site, dating to the Middle Period, contain flexed burials with bone implements, chert bifaces, charmstones, and oyster shells (Moratto 1984).

UPPER MIDDLE PERIOD (430-1,050 CE)

Around 430 CE, *Olivella* saucer bead trade networks established during earlier periods collapse and over half of known sites occupied during the Lower Middle Period are abandoned. *Olivella* saucer beads are replaced with *Olivella* saddle beads. New items appear, including elaborately decorated blades, fishtail charmstones, new *Haliotis* ornament forms, and mica ornaments. Sea otter bones appear more frequently than they did during earlier periods (Milliken et al. 2007:116). Subsistence analysis at various sites dating to this period indicates a diverse diet that included several species of fish, mammal species, bird species, shellfish, and plant resources that differed by location (Hylkema 2002).

LATE PERIOD (1,050 CE- CONTACT)

The Late Period brings an increase in social complexity, indicated by differences in burial techniques, and a greater degree of sedentism over that of preceding periods. Small, finely worked projectile points associated with bow and arrow technology appear around 1,250 CE. *Olivella* shell beads disappear and are replaced with clamshell disk beads. The toggle harpoon, hopper mortar, and magnesite tube beads also appear (Milliken et al. 2007:116-117). This period sees an increase in the intensity of resource exploitation that correlates with an increase in population. Many of the sites occupied in earlier periods are abandoned during this time, possibly due to fluctuating climate and drought that occurred throughout the Late Period (Lightfoot and Luby 2002).

Regional Post-European Contact History

SPANISH PERIOD (1769-1822)

For more than 200 years, Cabrillo and other Spanish, Portuguese, British, and Russian explorers sailed the Alta (upper) California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968:16-56; Rolle 2003:20-39). In 1579, Francis Drake landed in what was most likely San Francisco Bay. In 1595, Sebastian Cermeño landed in Drake's Bay before returning south (Bean 1968:22).

Gaspar de Portolá and Franciscan Father Junípero Serra established the first Spanish settlement in Alta California at Mission San Diego de Alcalá in 1769. This was the first of 21 missions erected by the Spanish between 1769 and 1823. Portolá continued north, reaching the San Francisco Bay in 1769. Short on food and supplies, the expedition turned back to San Diego. In 1770, Pedro Fages began his expedition, reaching the San Francisco Bay Area and exploring the region in 1772 (Bean 1968).

In 1770, the mission and presidio at Monterey were founded and three years later Juan Bautista de Anza proposed to open a land route from Sonora to Monterey. The viceroy at the time, Antonio de Bucareli, sanctioned Anza's expedition and proposed he extend it to form a settlement at the bay of San Francisco. Anza's first expedition traveled from Mexico City to Monterey. During this time, various sea expeditions from Monterey resulted in the discovery of Nootka Sound, the Columbia River, and the Golden Gate. Anza's second expedition began in 1775 and lead to the establishment of the presidio and Mission Dolores at San Francisco, (Bean 1968:43-44). Spanish colonial activity in the Bay Area concentrated on Mission Dolores and the presidio. Mission San Francisco Solano was founded in Solano during the Mexican Period, in 1823, and was the last California mission established (California Mission Resource Center 2016).

MEXICAN PERIOD (1822-1848)

The Mexican Period commenced when news of the success of the Mexican Revolution (1810-1821) against the Spanish crown reached California in 1822. This period saw the privatization of mission lands in California with the passage of the Secularization Act of 1833. This Act enabled Mexican governors in California to distribute mission lands to individuals in the form of land grants. Successive Mexican governors made more than 700 land grants between 1822 and 1846, putting most of the state's lands into private ownership for the first time (Shumway 2006).

The Mexican Period saw an increased importance of sea trade and an influx of American settlers, which motivated the United States to expand its territory into California. The United States supported a small group of insurgents from Sonoma during the Bear Flag Revolt, during which the Bear Flaggers captured Sonoma in June 1846. The next month, Commodore John Drake Sloat landed in Monterey and proceeded to take Yerba Buena, Sutter's Fort, Bodega Bay, and Sonoma. Fighting between American and Mexican forces continued until Mexico surrendered in 1847 (Rolle 2003).

AMERICAN PERIOD (1848-PRESENT)

The American Period officially began with the signing of the Treaty of Guadalupe Hidalgo in 1848, in which the United States agreed to pay Mexico $15 million for the conquered territory that included California, Nevada, Utah, and parts of Colorado, Arizona, New Mexico, and Wyoming. Settlement of California continued to increase during the early American Period. Many ranchos in Sonoma County were sold or otherwise acquired by Americans, and most were subdivided into agricultural parcels or towns.

The discovery of gold in northern California in 1848 led to the California Gold Rush (Guinn 1976; Workman 1936:26) and California's population grew exponentially. During this time, San Francisco became California's first true city, growing from a population of 812 to 25,000 in only a few years (Rolle 2003:113).

Sonoma County

The following excerpt from the County of Sonoma Historic Resources web page offers an overview of the County's history since the nineteenth century (Hurley 2020).

> Before the European settlement, [the Pomo, (Coast) Miwok, and Kashaya Indians inhabited] what is today Sonoma County. In 1812, the Russians established the short-lived Fort Ross along the coast north of the Russian River. Further east, the Sonoma Mission was established during the Mexican period in 1823. Shortly afterwards, Sonoma became the County's first town, a pueblo, under General Mariano Vallejo. During that time, sections of the County were

transformed into vast land-grant ranchos, such as Vallejo's holdings that extended from today's Petaluma to the town of Sonoma. Most of the construction during the first half of the nineteenth century was adobe and wood. These construction methods drew on the Mexican tradition while incorporating some of the features and floor plans of the Anglo Americans.

After statehood, logging along the coast hills, cattle ranching, wheat and potato farming, and the early development of the wine industry supported the sparsely settled county. During this time, commercial and industrial buildings used local stone or brick, while most residences were built of wood. During the 1860s to the 1890s, Petaluma, at the head of navigation on the Petaluma Creek, enjoyed rapid economic growth that fueled the construction of [its] downtown with sophisticated iron-front commercial buildings and elegant residences nearby.

Later the railroads facilitated the movement of goods and people leading to the establishment of processing plants and factories along the rail lines.

Around the turn of the century, the Russian River developed as a vacation resort, a destination for those in the San Francisco Bay Area. During this time, Santa Rosa also enjoyed an increase in population and importance as the center of finance and county government. Until World War II, the poultry industry, the processing of local fruit, and the production of hops sustained the economy throughout the County. In 1935, Sonoma County ranked tenth in the nation in overall agricultural production.

During the first half of the twentieth century, many of the stylish buildings were designed by local architects such as Brainerd Jones in Petaluma and William Herbert in Santa Rosa. After World War II, Clarence Caulkins and J. Clarence Felciano worked on many projects in the County. With reference to residential, commercial, and industrial architecture, many of the towns still retain excellent examples of both high style and vernacular building examples from the nineteenth and early twentieth centuries.

Today the southwestern part of the County continues to support cattle grazing and dairy farms. Toward the north many of the ranches and orchards have been replaced with acres of vineyards and thriving winery operations that rival Napa County. Over the years many of the poultry farms, fruit growers, and dairy operations have relocated to the Central Valley or sold their businesses completely. In their place, small specialty farms and ranches now operate sustainable and organic endeavors. Dotting the countryside throughout the County are modern residences where rural homesteads used to be. The Russian River area still caters to vacationers, but on a smaller scale, and the cities along the freeway continue to expand to provide housing and services with new subdivisions, business parks, and strip-mall shopping centers.

With 467,000 residents, the County has doubled its population since 1980. Part of the challenge has been to retain its agricultural and small-town character while providing for the livelihood of the expanding population. Related to this is the specific challenge of encouraging new development that complements both the physical beauty of the countryside and the County's rich heritage.

Existing Conditions

Due to the programmatic and high-level nature of the Housing Element Update, a records search at the Northwest Information Center has not been conducted. However, archaeological sites are present throughout Sonoma County. Areas most likely to be sensitive for archaeological sites include landforms near fresh water sources.

A review of available listings of the National Register of Historic Places (NRHP), California Office of Historic Preservation, and Sonoma County Historic Landmarks failed to identify any known historical resources or historic districts in the Rezoning Sites that are designated at the federal, state, or local levels. A review of historic aerial photographs and information on file with the Sonoma County Assessor does indicate, however, that there are built environment properties that are 45 years of age or older, such as buildings and/or structures on the Rezoning Sites, or on adjacent parcels (NETR Online 2020; Parcelquest 2020). According to guidance from the California Office of Historic Preservation, built environment features over 45 years of age maybe considered for federal, state and/or local designation (California Office of Historic Preservation n.d., 1995). Table 4.5-1 lists Rezoning Sites and indicates those that may contain historic-age buildings and/or structures on site.

Table 4.5-1 Rezoning Sites with Historic-Age Buildings

Rezoning Site	Nearest Community	Historic-Age Buildings
GEY-1	Geyserville	No
GEY-2	Geyserville	Yes
GEY-3	Geyserville	Inconclusive*
GEY-4	Geyserville	Yes
GUE-1	Guerneville	Yes
GUE-2	Guerneville	Yes
GUE-3	Guerneville	Yes
GUE-4	Guerneville	Yes
LAR-1	Larkfield	No
LAR-2	Larkfield	No
LAR-3	Larkfield	No
LAR-4	Larkfield	No
LAR-5	Larkfield	No
LAR-6	Larkfield	No
LAR-7	Larkfield	Yes
LAR-8	Larkfield	No
FOR-1	Forestville	Yes
FOR-2	Forestville	Yes
FOR-3	Forestville	No
FOR-4	Forestville	Yes
FOR-5	Forestville	No
FOR-6	Forestville	No
GRA-1	Graton	No
GRA-2	Graton	No
GRA-3	Graton	No
GRA-4	Graton	Yes
GRA-5	Graton	No
SAN-1	Santa Rosa	No
SAN-2	Santa Rosa	Yes

Rezoning Site	Nearest Community	Historic-Age Buildings
SAN-3	Santa Rosa	No
SAN-4	Santa Rosa	Yes
SAN-5	Santa Rosa	No
SAN-6	Santa Rosa	No
SAN-7	Santa Rosa	No
SAN-8	Santa Rosa	Yes
SAN-9	Santa Rosa	Yes
SAN-10	Santa Rosa	Inconclusive*
GLE-1	Glen Ellen	Yes
GLE-2	Glen Ellen	Yes
AGU-1	Agua Caliente	Yes
AGU-2	Agua Caliente	Yes
AGU-3	Agua Caliente	Yes
PEN-1	Penngrove	No
PEN-2	Penngrove	Yes
PEN-3	Penngrove	Yes
PEN-4	Penngrove	Yes
PEN-5	Penngrove	Yes
PEN-6	Penngrove	Yes
PEN-7	Penngrove	Yes
PEN-8	Penngrove	Yes
PEN-9	Penngrove	Yes
PET-1	Petaluma	Yes
PET-2	Petaluma	No
PET-3	Petaluma	Yes
PET-4	Petaluma	Yes
SON-1	Sonoma	Yes
SON-2	Sonoma	Yes
SON-3	Sonoma	Yes
SON-4	Sonoma	Yes

NETR Online 2020; Parcelquest 2020; California Office of Historic Preservation n.d. and 1995

*Properties in this table are identified as "inconclusive" for the presence of historic-age buildings if sources consulted for this EIR, such as County assessor data and historic aerial photographs, did not definitively indicate whether historic-age buildings were present.

4.5.2 Regulatory Setting

a. Federal

National Register of Historic Places

The National Historic Preservation Act of 1966 established the NRHP as "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment" (36 Code of Federal Regulations 60.2). To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

Criterion A: It is associated with events that have made a significant contribution to the broad patterns of our history.

Criterion B: It is associated with the lives of persons who are significant in our past.

Criterion C: It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction.

Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.

b. State

California Register of Historical Resources

CEQA requires that a lead agency determine whether a project could have a significant effect on historical resources and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). A historical resource is one listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR; PRC Section 21084.1), a resource included in a local register of historical resources (PRC Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (PRC Section 15064.5[a][3]).

PRC Section 5024.1 requires an evaluation of historical resources to determine their eligibility for listing in the CRHR. The purpose of the register is to maintain listings of the state's historical resources and to indicate which properties are to be protected from substantial adverse change. The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP, as enumerated according to CEQA below:

> *PRC 15064.5(a)(3)* […] Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC Section 5024.1; Title 14 CCR Section 4852) including the following:
>
> (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
>
> (2) Is associated with the lives of persons important in our past

(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values

(4) Has yielded, or may be likely to yield, information important in prehistory or history

PRC 15064.5(a)(4) The fact that a resource is not listed in or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1[k] of the PRC), or identified in an historical resources survey (meeting the criteria in section 5024.1[g] of the PRC) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

PRC Section 15064.5(b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

If a project can be demonstrated to cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to permit any or all these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a], [b], and [c]).

PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be demonstrated clearly that, without merely adding to the current body of knowledge, there is a high probability that it does one or more of the following:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to significant cultural resources that affect the characteristics of any resource that qualify it for the NRHP or adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. These impacts could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired (*CEQA Guidelines* Section 15064.5[b][1]). Material impairment is defined as demolition or alteration in an adverse manner of those characteristics of an historical resource that convey its historical significance and that justify its inclusion or eligibility for inclusion in the CRHR (*CEQA Guidelines* Section 15064.5[b][2][A]).

California Public Resources Code

Section 5097.5 of the California PRC states:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express

permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

As used in this PRC section, "public lands" means lands owned by or under the jurisdiction of the State or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, local agencies are required to comply with PRC Section 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others.

Codes Governing Human Remains

The discovery and disposition of human remains is governed by Health and Safety Code Section 7050.5 and PRC Sections 5097.91 and 5097.991 and falls within the jurisdiction of the Native American Heritage Commission (NAHC). If human remains are discovered, the county coroner must be notified within 48 hours, and there should be no further disturbance to the site where the remains were found. If the coroner determines the remains are Native American, the coroner is responsible to contact the NAHC within 24 hours. Pursuant to PRC Section 5097.98, the NAHC will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

c. Local

Sonoma County Landmarks Commission

The Sonoma County Landmarks Commission was established in 1974 and charged with the authority to designate Historic Landmarks and Historic Districts zoning. Sonoma County Code Section 26-68-005 states:

> **Intent and Purpose**. The Board of Supervisors finds and declares that the preservation of structures, sites, and areas of historical, architectural, and aesthetic interest promotes the general welfare of the citizens of Sonoma County. The purpose of this district is to protect those structures, sites, and areas that are reminders of past eras, events and persons important in local, state, or national history, or which provide significant examples of architectural styles of the past, or which are unique and irreplaceable assets to the County and its communities, or which provide for this and further generations examples of the physical surroundings in which past generations lived, so that they may serve an educational and cultural function for the citizens of Sonoma County and for the general public.

All structures, sites, and areas associated with significant events or persons, or that are important examples of architectural styles, are eligible for consideration as a Sonoma County Historic Landmark. As revised in 2008, the following criteria, which are based on NRHP and CRHR designation criteria, are used by the Landmark Commission for designation (Sonoma County Landmarks Commission, adopted April 3, 1978; revised June 30, 2008).

The quality of significance in Sonoma County, California, or American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, association, and one or more of the following:

a) that are associated with events that have made a significant contribution to the broad patterns of our history

b) that are associated with the lives of persons significant in our past

c) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

d) that have yielded, or may be likely to yield, information important in prehistory or history

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible as an Historic Landmark. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

a) A religious property deriving primary significance from architectural or artistic distinction or historical importance

b) A building or structure removed from its original location, but that is significant primarily for architectural value, or which is the surviving structure most importantly associated with an historic person or event

c) A birthplace or grave of an historical figure of outstanding importance if there is no other appropriate site or building directly associated with his/her productive life

d) A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with an historic event

e) A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived within that area

f) A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance

g) A property achieving significance within the past 50 years, if it is an important element to the environment of a particular community.

Sonoma County General Plan

The current Sonoma County General plan contains the following goals and objectives related to cultural resources:

Goal OSRC-19: Protect and preserve significant archaeological and historical sites that represent the ethnic, cultural, and economic groups that have lived and worked in Sonoma County, including Native American populations. Preserve unique or historically significant heritage or landmark trees.

Objective OSRC-19.1: Encourage the preservation and conservation of historic structures by promoting their rehabilitation or adaptation to new uses.

Objective OSRC-19.2: Encourage preservation of historic building or cemeteries by maintaining a Landmarks Commission to review projects that may affect historic structures or other cultural resources.

Objective OSRC-19.3: Encourage protection and preservation of archaeological and cultural resources by reviewing all development projects in archaeologically sensitive areas.

Objective OSRC-19.4: Identify and preserve heritage and landmark trees.

Objective OSRC-19.5: Encourage the identification, preservation, and protection of Native American cultural resources, sacred sites, places, features, and objects, including historic or prehistoric ruins, burial grounds, cemeteries, and ceremonial sites. Ensure appropriate treatment of Native American and other human remains discovered during a project.

4.5.3 Impact Analysis

a. Significance Thresholds and Methodology

The significance thresholds used in this analysis are based on Appendix G of the *CEQA Guidelines*. For the purposes of this EIR, a significant impact would occur if implementation of the proposed project would result in any of the following conditions:

1. Cause a substantial adverse change in the significance of a historical resource as defined in *CEQA Guidelines* Section 15064.5
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to *CEQA Guidelines* Section 15064.5
3. Disturb any human remains, including those interred outside of dedicated cemeteries

b. Project Impacts and Mitigation Measures

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

Impact CUL-1 THE HOUSING ELEMENT UPDATE HAS THE POTENTIAL TO CAUSE A SIGNIFICANT IMPACT ON A HISTORIC RESOURCE IF DEVELOPMENT FACILITATED BY THE PROJECT WOULD CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF THAT RESOURCE. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Although the project does not in itself include any construction activities, development facilitated by the project would have a significant impact on historical resources if such activities would cause a substantial adverse change in the significance of a historical resource, which, as defined below, would include the demolition or substantial alteration of a resource such that it would no longer be able to convey its significance. Historical resources include properties eligible for listing in the NRHP or CRHR or as a Sonoma County Historic Landmark. As explained in PRC Section 15064.5, "[s]ubstantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."

Although there are no known historical resources on the Rezoning Sites, 35 of the sites contain buildings and/or structures that are over 45 years of age and may not have been evaluated previously for historical resources eligibility (Table 4.5-1 above). Development facilitated by the project could impact presently unknown historical resources at these sites through demolition, construction, and reconstruction activities associated with the project. Therefore, mitigation measures would be required.

Mitigation Measures

CUL-1 ARCHITECTURAL HISTORY EVALUATION

For any future project proposed on or adjacent to a property that includes buildings, structures, objects, sites, landscape/site plans, or other features that are 45 years of age or older at the time of or permit application, the project applicant shall hire a qualified architectural historian to prepare an historical resources evaluation. The qualified architectural historian or historian shall meet the Secretary of the Interior's (SOI) Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices recommended by the State Office of Historic Preservation to identify any potential historical resources in the proposed project area. Under the guidelines, properties 45 years of age or older shall be evaluated within their historic context and documented in a technical report and on Department of Parks and Recreation Series 523 forms. The report will be submitted to the County for review prior to any permit issuance. If no historic resources are identified, no further analysis is warranted. If historic resources are identified by the Architectural History Evaluation, the project shall be required to implement Mitigation Measure CUL-2.

CUL-2 ARCHITECTURAL HISTORY MITIGATION

If historical resources are identified in an area proposed for redevelopment as the result of the process described in Mitigation Measure CUL-1, the project applicant shall reduce or eliminate impacts. Application of mitigation shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g. preservation in place). In conjunction with any project that may affect the historical resource, the project applicant shall provide a report identifying and specifying the treatment of character-defining features and construction activities to the County for review and approval, prior to permit issuance, to avoid or substantially reduce the severity of the proposed activity on the historical qualities of the resource. Any and all features and construction activities shall become Conditions of Approval for the project and shall be implemented prior to issuance of construction (demolition and grading) permits.

Mitigation measures may include but are not limited to compliance with the Secretary of the Interior's Standards for Treatment of Historic Properties and documentation of the historical resource in the form of a Historic American Building Survey (HABS)-like report. The HABS report shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements.

Significance After Mitigation

Even with implementation of Mitigation Measures CUL-1 and CUL-2, it is possible that development facilitated by the project may not be able to avoid impacts to a historical resource. Should a future project result in the demolition or substantial alteration of a historical resource, it would have the potential to materially impair the resource. Therefore, even with mitigation such as HABS, impacts may not be reduced to a less than significant level, and the impact would remain significant and unavoidable.

Threshold:	Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact CUL-2 DEVELOPMENT FACILITATED BY THE PROJECT HAS THE POTENTIAL TO CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE, INCLUDING THOSE THAT QUALIFY AS HISTORICAL RESOURCES. THIS IMPACT WOULD BE SIGNIFICANT AND MITIGATION WOULD BE REQUIRED.

Ground-disturbing activities associated with development facilitated by the project have the potential to damage or destroy historic-age or prehistoric archaeological resources that may be present on or below the ground surface, particularly in areas not studied in a cultural resources investigation or when excavation depths exceed those attained previously for past development. Each of the Rezoning Sites has the potential to contain archaeological resources. Consequently, because of the potential for damage to or destruction of known or previously unknown archaeological resources, this impact would be significant and mitigation measures would be required.

Mitigation Measures

CUL-3 PHASE I ARCHAEOLOGICAL RESOURCES STUDY

Prior to project approval, the project applicant shall investigate the potential to disturb archaeological resources. If the project will involve any ground disturbance, a Phase I cultural resources study shall be performed by a qualified professional meeting the SOI's PQS for archaeology (National Park Service 1983). If a project would solely involve the refurbishment of an existing building and no ground disturbance would occur, this measure would not be required. A Phase I cultural resources study shall include a pedestrian survey of the project site and sufficient background research and field sampling to determine whether archaeological resources may be present. Archival research shall include a records search of the Northwest Information Center no more than two years old and a Sacred Lands File search with the NAHC. The Phase I technical report documenting the study shall include recommendations that must be implemented prior to and/or during construction to avoid or reduce impacts on archaeological resources, to the extent that the resource's physical constituents are preserved or their destruction is offset by the recovery of scientifically consequential information. The report shall be submitted to the County for review and approval, prior to the issuance of any grading or construction permits, to ensure that the identification effort is reasonable and meets professional standards in cultural resources management. Recommendations in the Phase I technical report shall be made Conditions of Approval and shall be implemented throughout all ground disturbance activities.

CUL-4 EXTENDED PHASE I TESTING

For any projects proposed within 100 feet of a known archaeological site and/or in areas identified as sensitive by the Phase I study (Mitigation Measure CUL-3), the project applicant shall retain a qualified archaeologist to conduct an Extended Phase I (XPI) study to determine the presence/absence and extent of archaeological resources on the project site. XPI testing shall comprise a series of shovel test pits and/or hand augured units and/or mechanical trenching to establish the boundaries of archaeological site(s) on the project site. If the boundaries of the archaeological site are already well understood from previous archaeological work and is clearly interpretable as such by a qualified cultural resources professional, an XPI will not be required. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall

confer with local California Native American tribe(s) and any XPI work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4.

All archaeological excavation shall be conducted by a qualified archaeologist(s) under the direction of a principal investigator meeting the SOI's PQS for archaeology (National Park Service 1983). If an XPI report is prepared, it shall be submitted to Sonoma County for review and approval prior to the issuance of any grading or construction permits. Recommendations contained therein shall be implemented for all ground disturbance activities.

CUL-5 ARCHAEOLOGICAL SITE AVOIDANCE

Any identified archaeological sites (determined after implementing Mitigation Measures CUL-3 and/or CUL-4) shall be avoided by project-related construction activities. A barrier (temporary fencing) and flagging shall be placed between the work location and any resources within 60 feet of a work location to minimize the potential for inadvertent impacts.

CUL-6 PHASE II SITE EVALUATION

If the results of any Phase I and/or XPI (Mitigation Measures CUL-3 and/or CUL-4) indicate the presence of archaeological resources that cannot be avoided by the project (Mitigation Measure CUL-5) and that have not been adequately evaluated for CRHR listing at the project site, the qualified archaeologist will conduct a Phase II investigation to determine if intact deposits remain and if they may be eligible for the CRHR or qualify as unique archaeological resources. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s) and any Phase II work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4.

A Phase II evaluation shall include any necessary archival research to identify significant historical associations and mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit. The sample excavation will characterize the nature of the sites, define the artifact and feature contents, determine horizontal and vertical boundaries, and retrieve representative samples of artifacts and other remains.

If the archeologist and, if applicable, a Native American monitor (see Mitigation Measure TCR-4) or other interested tribal representative determine it is appropriate, cultural materials collected from the site shall be processed and analyzed in a laboratory according to standard archaeological procedures. The age of the materials shall be determined using radiocarbon dating and/or other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards. The significance of the sites shall be evaluated according to the criteria of the CRHR. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation publication "Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)." The report shall be submitted to Sonoma County for review and approval prior to the issuance of any grading or construction permits. Recommendations in the Phase II report shall be implemented for all ground disturbance activities.

CUL-7 PHASE III DATA RECOVERY

If the results of the Phase II site evaluation (Mitigation Measure CUL-6) yield resources that meet CRHR significance standards and if the resource cannot be avoided by project construction in accordance with Mitigation Measure CUL-5, the project applicant shall ensure that all recommendations for mitigation of archaeological impacts are incorporated into the final design and approved by the County prior to construction. Any necessary Phase III data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the SOI standards for archaeology according to a research design reviewed and approved by the County prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the California Office of Historic Preservation Planning Bulletin 5 (1991), Guidelines for Archaeological Research Design, or the latest edition thereof. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s) and any Phase III work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4.

As applicable, the final Phase III Data Recovery reports shall be submitted to Sonoma County prior to issuance of any grading or construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.

CUL-8 CULTURAL RESOURCES MONITORING

If recommended by Phase I, XPI, Phase II, or Phase III studies (Mitigation Measures CUL-3, CUL-4, CUL-6, and/or CUL-7), the project applicant shall retain a qualified archaeologist to monitor project-related, ground-disturbing activities. If archaeological resources are encountered during ground-disturbing activities, Mitigation Measures CUL-5 through CUL-7 shall be implemented, as appropriate. The archaeological monitor shall coordinate with any Native American monitor as required by Mitigation Measure TCR-4.

CUL-9 UNANTICIPATED DISCOVERY OF ARCHAEOLOGICAL RESOURCES

If archaeological resources are encountered during ground-disturbing activities, work within 60 feet shall be halted and the project applicant shall retain an archaeologist meeting the SOI's PQS for archaeology (National Park Service 1983) immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of CCR Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. If the resource is of Native American origin, implementation of Mitigation Measures TCR-1 through TCR-4 may be required. Any reports required to document and/or evaluate unanticipated discoveries shall be submitted to the County for review and approval. Recommendations contained therein shall be implemented throughout the remainder of ground disturbance activities.

Significance After Mitigation

Implementation of Mitigation Measures CUL-3 through CUL-9 would reduce impacts to archaeological resources to less than significant levels by ensuring the avoidance of archeological resources, or by identifying, evaluating, and conducting data recovery archaeological resources that may be impacted by future projects in a timely manner.

Threshold:	Would the project disturb any human remains, including those interred outside of formal cemeteries?

Impact CUL-3 **THE DISCOVERY OF HUMAN REMAINS IS ALWAYS A POSSIBILITY DURING GROUND-DISTURBING ACTIVITIES. GROUND DISTURBANCE ASSOCIATED WITH DEVELOPMENT FACILITATED BY THE PROJECT MAY DISTURB OR DAMAGE KNOWN OR UNKNOWN HUMAN REMAINS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH ADHERENCE TO EXISTING REGULATIONS.**

Existing regulations exist to address the discovery of human remains. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. If an unanticipated discovery of human remains occurs, the county coroner must be notified immediately. If the human remains are determined to be prehistoric, the coroner will notify the NAHC, which will determine and notify a most likely descendant, who shall complete an inspection of the site and provide recommendations for treatment to the landowner within 48 hours of being granted access. With adherence to existing regulations, the archaeological resources mitigation measures identified above, program and project impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Compliance with existing regulations and archaeological resources mitigation measures would reduce project impacts to human remains to less than significant levels by ensuring proper identification and treatment of any human remains that may be present on the Rezoning Sites.

4.6 Energy

This section evaluates impacts to energy, including the potential wasteful, inefficient, or unnecessary consumption of energy, associated with the implementation of the proposed project.

4.6.1 Setting

Energy relates directly to environmental quality as energy use can adversely affect air quality and other natural resources. Fossil fuels are burned to create electricity to power homes and vehicles, which creates heat. A discussion of transportation energy use relates to the fuel efficiency of cars and trucks, and the availability and use of public transportation, the choice of different travel modes (auto, carpool, and public transit), and the miles traveled by these modes. Construction and routine operation and maintenance of infrastructure also consume energy, as do residential land uses, typically in the form of natural gas and electricity.

a. Energy Supply

Natural gas-fired generation has dominated electricity production in California for many years. In 2020, however, the two largest sources of energy produced in California were noncombustible renewable energy sources at approximately 845.3 trillion British thermal units (Btu), and crude oil at approximately 814.4 trillion Btu, while natural gas production was approximately 192.1 trillion Btu. Other sources of energy produced in California include nuclear power, biofuels, and wood and waste (Energy Information Administration [EIA] 2022a). Sonoma County has two inactive Petaluma and Cotati Gas oil fields, and the Geysers geothermal well area that extends into Lake and Mendocino counties (California Department of Conservation, Division of Oil, Gas & Geothermal Resources 2020).

b. Energy Consumption and Sources

Total energy consumption in the United States (U.S.) in 2021 was approximately 97.33 quadrillion Btu (EIA 2022b). Petroleum provided approximately 36 percent of that energy, with other sources of energy coming from natural gas (approximately 32 percent), coal (approximately 11 percent), total renewable sources (approximately 12 percent), and nuclear power (approximately 8 percent). On a per capita basis in 20120, California was ranked the fourth lowest state in terms of total energy consumption (175.3 million Btu [MMBtu] per person), or about 39 percent less than the U.S. average per capita consumption of 280.1 MMBtu per person (EIA 2022c).

Electricity and Natural Gas

Most of the electricity generated in California is from natural gas-fired power plants, which provided approximately 48 percent of total electricity generated in 2020 (California Energy Commission [CEC] 2022). In 2020, California produced approximately 70 percent of the electricity it used and imported the rest from outside the state. In the same year, California used 277,149,028 gigawatt hours (GWh) of electricity, with 193,074,930 GWh produced in-state (EIA 2021).

Sonoma County as a whole consumed approximately 105 million therms of natural gas in 2020 in both residential and non-residential uses (CEC 2022a). Sonoma County also consumed approximately 2,868 GWh of electricity in 2020 from residential and non-residential uses (CEC 2022b).

Two electricity providers serve unincorporated Sonoma County: Sonoma Clean Power (SCP) and Pacific Gas and Electric Company (PG&E). PG&E is also the natural gas provider for the entire County. SCP provides clean energy that is 93 percent carbon free, sourced from renewable energy (24 percent wind, 15 percent geothermal, and 10 percent solar), carbon-free hydroelectric power (44 percent), and general system power (7 percent) (SCP 2022). In conjunction with the utility companies, the California Public Utilities Commission (CPUC) is involved in energy conservation programs.

Petroleum

Energy consumed by the transportation sector accounts for roughly 34 percent of California's energy demand, amounting to approximately 2,355.5 trillion Btu in 20120 (EIA 2022d). Petroleum-based fuels are used for approximately 97.9 percent of the state's transportation activity (EIA 2022e). Most gasoline and diesel fuel sold in California for motor vehicles is refined in California to meet state-specific formulations required by the California Air Resources Board (CARB). California's transportation sector, including on-road and rail transportation, consumed approximately 524 million barrels of petroleum fuels in 2020 (EIA 2022f).

As shown in Table 4.6-1, approximately 197 million gallons of fuel were consumed in the County in 2020, of which approximately 167 million gallons were gasoline and approximately 30 million gallons were diesel fuel (CEC 2020). This equates to approximately 0.54 million gallons of fuel per day or 1.1 gallons of fuel per person per day, based on a 2020 countywide population of 488,863 people (California Department of Finance 2022).

Table 4.6-1 Annual and Daily Transportation Energy Consumption in Sonoma County

Fuel Type	2020 Annual Fuel Use (million gallons)	2020 Daily Fuel Use (million gallons)	2020 Daily Energy Use (billions of Btu)	2020 Daily per Capita Energy Use (thousands of Btu)
Gasoline	167	0.46	50.5	103.3
Diesel	30	0.08	10.2	20.9
Total	**197**	**0.54**	**60.7**	**124.2**

Notes: Btu = British thermal units
Source: CEC 2020

According to the CEC, one gallon of gasoline is equivalent to approximately 109,786 Btu, while one gallon of diesel is equivalent to approximately 127,460 Btu (Schremp 2017). Based on this formula, approximately 60.7 billion Btu in transportation fuel were consumed per day in 2020 in Sonoma County (see Table 4.6-1).

Alternative Fuels

A variety of alternative fuels are used to reduce petroleum-based fuel demand. The use of these fuels is encouraged through various statewide regulations and plans (e.g., Low Carbon Fuel Standard and Health and Safety Code Section 38566 [Senate Bill (SB) 32]). Conventional gasoline and diesel may be replaced, depending on the capability of the vehicle, with many alternative fuels including the following:

Hydrogen is being explored for use in combustion engines and fuel cell electric vehicles. The interest in hydrogen as an alternative transportation fuel stems from its clean-burning qualities, its potential

for domestic production, and the fuel cell vehicle's potential for high efficiency (two to three times more efficient than gasoline vehicles). Currently, 56 open hydrogen refueling stations are in California, but none are in Sonoma County (California Fuel Cell Partnership 2022).

Biodiesel is a renewable alternative fuel that can be manufactured from vegetable oils, animal fats, or recycled restaurant greases. Biodiesel is biodegradable and cleaner-burning than petroleum-based diesel fuel. Biodiesel can run in any diesel engine generally without alterations but fueling stations have been slow to make it available. There are 18 biodiesel refueling stations in California, one of which is located in Sonoma County (U.S. Department of Energy 2022).

Electricity can be used to power electric and plug-in hybrid electric vehicles directly from the power grid. The electricity grid usually provides electricity used to power vehicles, which store it in the vehicle's batteries. The electricity provided by SCP is 93 percent carbon free (SCP 2022). Fuel cells are being explored to use electricity generated on board the vehicle to power electric motors. Electrical charging stations are throughout Sonoma County, including in Bodega Bay, Cotati, Forestville, Fulton, Geyserville, Glen Ellen, Healdsburg, Petaluma, Rohnert Park, Santa Rosa, Sebastopol, Sonoma, and Windsor (County of Sonoma 2020).

c. Energy and Fuel Efficiency

Though the demand for gasoline and diesel fuel is rising because of population growth and limited mass transit, the increase in demand can be offset partially by efficiency improvements. Land use policies that encourage infill and growth near transit centers (e.g., following SB 375, the Sustainable Communities and Climate Protection Act of 2008), improvements to fuel efficiency, and gradual replacement of the vehicle fleet with new, more fuel-efficient and alternative fuel cars as well as electric cars will all reduce fuel use. In the future, increasing gasoline prices may apply downward pressure to gasoline demand in the State.

4.6.2 Regulatory Setting

Programs and policies at the state and national levels have emerged to bolster the previous trend towards energy efficiency, as discussed below.

a. Federal Regulations

Energy Policy Conservation Act and Corporate Average Fuel Economy

The Energy Policy Conservation Act (Corporate Average Fuel Economy [CAFE]) of 1975 established nationwide fuel economy standards to conserve oil. Pursuant to this Act, the National Highway Traffic and Safety Administration, part of the U.S. Department of Transportation, is responsible for revising existing fuel economy standards and establishing new vehicle fuel economy standards.

The CAFE program was established to determine vehicle manufacturer compliance with the government’s fuel economy standards. Compliance with CAFE standards is determined based on each manufacturer’s average fuel economy for the portion of their vehicles produced for sale in the U.S.

National Energy Policy Act of 1992

The National Energy Policy Act of 1992 (EPACT92) calls for programs that promote efficiency and the use of alternative fuels. EPACT92 requires certain federal, state, and local governments and private operators to stock vehicle fleets with a percentage of light duty alternative fuel vehicles each year.

In addition, EPACT92 has financial incentives: federal tax deductions will be allowed for businesses and individuals to cover the incremental cost of alternative fuel vehicles. EPACT92 also requires states to consider a variety of incentive programs to help promote alternative fuel vehicles.

Energy Policy Act of 2005

The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act is designed to improve vehicle fuel economy and help reduce U.S. dependence on oil. It expands the production of renewable fuels, reducing dependence on oil, and confronting global climate change. Specifically, it does the following:

1. Increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel in 2022, which represents a nearly five-fold increase over current levels
2. Reduces U.S. demand for oil by setting a national fuel economy standard of 35 miles per gallon by 2020 – an increase in fuel economy standards of 40 percent over those in 2007

Safer Affordable Fuel-Efficient Vehicles Rule

The Safer Affordable Fuel-Efficient Vehicles Rule, issued March 31, 2020, sets fuel economy and carbon dioxide standards that increase 1.5 percent in stringency each year from model years 2021 through 2026. These standards apply to both passenger cars and light trucks and are a reduction in stringency from the 2012 standards which would have required increases of about 5.0 percent per year. This rule is anticipated to result in a 40.4 mile per gallon industry average for 2026.

b. State Regulations

Warren-Alquist Act

The 1975 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the CEC. The Act established a State policy to reduce wasteful, uneconomical, and unnecessary uses of energy by employing a range of measures. The CPUC regulates privately owned utilities in the energy, rail, telecommunications, and water fields.

Assembly Bill 2076: Reducing Dependence on Petroleum

Pursuant to Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000; codified as Public Resources Code Sections 25720-25721), the CEC and CARB prepared and adopted in 2003 a joint agency report, Reducing California's Petroleum Dependence. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030; significantly increase the efficiency of motor vehicles; and reduce per capita vehicle miles traveled (VMT). One of the performance-based goals of AB 2076 is to reduce petroleum demand to 15 percent below 2003 demand. Furthermore, in response to the CEC's 2003 and 2005 Integrated Energy Policy reports, the Governor directed the CEC to take the lead in developing a long-term plan to increase alternative fuel use.

Integrated Energy Policy Report

SB 1389 (Chapter 568, Statutes of 2002) requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and price to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety.

California Renewables Portfolio Standard Program

In 2018, the California Renewables Portfolio Standard (SB 100) was signed into law, which increased the renewable portfolio standard (RPS) to 60 percent by 2030 (i.e., that 60 percent of electricity retail sales must be served by renewable sources by 2030) and requires all the state's electricity to come from carbon-free resources by 2045.

Senate Bill 350: Clean Energy and Pollution Reduction Act of 2015

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources to be increased to 50 percent by December 31, 2030. The Act also requires doubled energy efficiency savings in electricity and natural gas for retail customers through increased efficiency and conservation by December 31, 2030.

Assembly Bill 1493: Reduction of Greenhouse Gas Emissions

AB 1493 (Chapter 200, Statutes of 2002), known as the "Pavley bill," amended Health and Safety Code sections 42823 and 43018.5 and requires CARB to develop and adopt regulations that achieve maximum feasible and cost-effective reduction of greenhouse gas (GHG) emissions from passenger vehicles, light-duty trucks, and other vehicles used for noncommercial personal transportation in California.

Implementation of new regulations prescribed by AB 1493 required the State of California to apply for a waiver under the federal Clean Air Act. Although the U.S. Environmental Protection Agency (USEPA) initially denied the waiver in 2008, USEPA approved a waiver in June 2009, and in September 2009, CARB approved amendments to its initially adopted regulations to apply the Pavley standards that reduce GHG emissions to new passenger vehicles in model years 2009 through 2016. According to CARB, implementation of the Pavley regulations is expected to reduce fuel consumption while also reducing GHG emissions (CARB 2020).

Energy Action Plan

The first Energy Action Plan (EAP) emerged in 2003 from a crisis atmosphere in California's energy markets. The State's three major energy policy agencies (CPUC, CEC, and the Consumer Power and Conservation Financing Authority [established under deregulation and now defunct]) came together to develop one high-level, coherent approach to meeting California's electricity and natural gas needs. It was the first time that energy policy agencies formally collaborated to define a common vision and set of strategies to address California's future energy needs. They emphasized the importance of the impacts of energy policy on California's environment.

In the October 2005 EAP II, the CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as the emerging importance of climate change, transportation-related energy issues, and research and development

activities. The CEC adopted an update to the EAP II in February 2008 that supplements earlier EAPs and examines the State's ongoing actions in the context of global climate change.

Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 (Chapter 371, Statutes of 2005) required the CEC to prepare a State plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other State, federal, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative, nonpetroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuel use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

Bioenergy Action Plan, Executive Order S-06-06

Executive Order (EO) S-06-06, April 25, 2006, establishes targets for the use and production of biofuels and biopower, and directs State agencies to work together to advance biomass programs in California while providing environmental protection and mitigation. The EO establishes the following target to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050. EO S-06-06 also calls for the State to meet a target for use of biomass electricity. The 2011 Bioenergy Action Plan identifies those barriers and recommends actions to address them so that the State can meet its clean energy, waste reduction, and climate protection goals. The 2012 Bioenergy Action Plan updates the 2011 Plan and provides a more detailed action plan to achieve the following goals:

1. Increase environmentally and economically sustainable energy production from organic waste
2. Encourage development of diverse bioenergy technologies that increase local electricity generation, combined heat and power facilities, renewable natural gas, and renewable liquid fuels for transportation and fuel cell applications
3. Create jobs and stimulate economic development, especially in rural regions of the State
4. Reduce fire danger, improve air and water quality, and reduce waste

Title 24, Part 6, California Code of Regulations (CCR)

CCR, Title 24, Part 6, is California's Energy Efficiency Standards for Residential and Non-Residential Buildings. The CEC established Title 24 in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and nonresidential buildings. The standards are updated on an approximately three-year cycle to allow consideration and possible incorporation of new efficient technologies and methods. In 2019, the CEC updated Title 24 standards with more stringent requirements effective January 1, 2020. All buildings for which an application for a building permit is submitted on or after January 1, 2020 must follow the 2019 standards. The next update is expected in 2022. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided that these standards exceed those

provided in Title 24. The most current standards are the 2019 Title 24 standards (CEC 2018a). The 2019 Standards focus on four key areas: 1) smart residential photovoltaic systems; 2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); 3) residential and nonresidential ventilation requirements; 4) and nonresidential lighting requirements (CEC 2018a). Under the 2019 Standards, nonresidential buildings will be 30 percent more energy-efficient compared to the 2016 Standards (CEC 2018b).

California Green Building Standards Code (2019), CCR Title 24, Part 11

California's green building code, referred to as CALGreen, was developed to provide a consistent approach to green building within the State. CALGreen lays out the minimum requirements for newly constructed residential and nonresidential buildings to reduce GHG emissions through improved efficiency and process improvements. The requirements pertain to energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. It also includes voluntary tiers to further encourage building practices that improve public health, safety, and general welfare by promoting a more sustainable design.

c. Local Regulations

Sonoma County General Plan

The Sonoma County General Plan Open Space and Resource Conservation Element includes goals and policies that would reduce energy use in the County. Goals and policies from the County General Plan are provided below.

Goal OSRC-14: Promote energy conservation and contribute to energy demand reduction in the County.

Objective OSRC-14.2: Encourage County residents and businesses to increase energy conservation and improve energy efficiency.

Objective OSRC-14.3: Reduce the generation of solid waste and increase solid waste reuse and recycling.

Policy OSRC-14d: Support project applicants in incorporating cost effective energy efficiency that may exceed State standards.

Policy OSRC-14f: Use the latest green building certification standards, such as the Leadership in Energy and Environmental Design (LEED) standards, for new development.

Goal OSRC-15: Contribute to the supply of energy in the County primarily by increased reliance on renewable energy sources.

Objective OSRC-15.2: Promote the use of renewable energy and distributed energy generation systems and facilities in new development in the County.

Sonoma County Climate Change Action Resolution

On May 8, 2018, the Sonoma County Board of Supervisors adopted the Climate Change Action Resolution to support a county-wide framework for reducing GHG emissions and to pursue local actions that support the identified goals therein. The resolution aims to reduce GHG emissions by 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050; and adopts various goals to reduce GHG emissions, including increasing building energy efficiency, increasing the use of renewable energy, electrifying equipment, and increasing fuel efficiency.

4.6.3 Impact Analysis

a. Significance Thresholds

An energy-related impact is considered significant if the proposed project would result in one or more of the following conditions:

1. Wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation
2. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency

b. Methodology

Public Resources Code Section 21100(b)(3) states that an EIR shall include "mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy." The physical environmental impacts associated with the use of energy, including the generation of electricity and burning of fuels, have been accounted for in Section 4.3, *Air Quality*, and Section 4.8, *Greenhouse Gas Emissions*.

Energy consumption is analyzed herein in terms of construction and operational energy. Construction energy demand accounts for anticipated energy consumption during construction of development facilitated by the proposed project, such as fuel consumed by construction equipment and construction workers' vehicles traveling to and from the construction site. Operational energy demand accounts for the anticipated energy consumption during operation of the development facilitated by the project, such as fuel consumed by cars, trucks, and public transit; natural gas consumed for on-site power generation and heating building spaces; and electricity consumed for building power needs, including, but not limited to lighting, water conveyance, and air conditioning.

The California Emissions Estimator Model (CalEEMod) version 2016.3.2 was used to approximate emissions resulting from the proposed project. The CalEEMod results (Appendix AQ) provide the average travel distance, vehicle trip numbers, and vehicle fleet mix during construction and operation of development facilitated by the project, which were based on the VMT provided by Fehr & Peers (Appendix TRA) as described in Section 4.16, *Transportation*. The CalEEMod input data is described in Section 4.3, *Air Quality*, which also provides estimated gross electricity and natural gas consumption by land use during operation of the proposed project. The values in the CalEEMod data are used in this analysis to anticipate energy consumption during construction and operation of development facilitated by the project.

This analysis considers the equipment and processes employed during construction of housing development facilitated by the project and the land uses, location, and VMT per service population (residents plus employees) of the proposed project to qualitatively determine whether energy consumed during construction and operation would be wasteful, inefficient, or unnecessary.

c. Project Impacts and Mitigation Measures

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

Impact ENR-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN A SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO THE WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Demolition and Construction

Demolition and construction activities associated with development facilitated by the project would require energy resources primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Temporary power may be provided for construction trailers and electric construction equipment. Table 4.6-2 summarizes the anticipated energy consumption from construction equipment and vehicles, including construction worker trips to and from the Rezoning Sites. Construction of development facilitated by the project would also use building materials, the manufacture and procurement of which would require energy use, but the California Natural Resources Agency's Final Statement of Reasons notes that "a full 'lifecycle' analysis that would account for energy used in building materials and consumer products will generally not be required" (California Natural Resources Agency 2018). Furthermore, it is reasonable to assume that manufacturers of concrete, steel, lumber, or other building materials would employ energy conservation practices to minimize their cost of doing business. It also is reasonable to assume that non-custom building materials, such as drywall and standard-shaped structural elements, will be manufactured regardless of the project and, if not used for the project, would be used elsewhere. Therefore, the consumption of energy required for the manufacturing of building and construction material is not part of the quantitative analysis.

Table 4.6-2 Project Construction Energy Usage

Source	Gasoline (gallons)	Diesel (gallons)
Construction Equipment & Vendor/Hauling Trips	–	714,519
Construction Worker Vehicle Trips	510,632	–

See Appendix AQ for CalEEMod default values for fleet mix and average distance of travel and Appendix NRG for energy calculation sheets.

As shown in Table 4.6-2, demolition and construction activities from development facilitated by the project would require approximately 510,632 gallons of gasoline and 714,519 gallons of diesel fuel. Energy use during demolition and construction would be temporary, and construction equipment used would be typical of similar-sized construction projects in the region. Development facilitated by the project would utilize construction contractors that comply with applicable CARB regulations such as accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment, and restricted idling of heavy-duty diesel motor vehicles. Construction contractors are required to comply with the provisions of CCR Title 13, sections 2449 and 2485, prohibiting diesel-fueled commercial and off-road vehicles from idling for more than five minutes, minimizing unnecessary fuel consumption. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would minimize inefficient fuel consumption. These construction equipment standards (i.e., Tier 4 efficiency requirements) are

contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068. Electrical power would be consumed during demolition and construction activities, and the demand, to the extent required, would be supplied from existing electrical infrastructure in the area.

Overall, demolition and construction activities would not have any adverse impact on available electricity supplies or infrastructure. Demolition and construction activities would utilize fuel-efficient equipment consistent with State and federal regulations and would comply with state measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. Per applicable regulatory requirements such as 2019 or later CALGreen, development facilitated by the project would comply with construction waste management practices to divert construction and demolition debris from landfills. These practices would result in efficient use of energy by construction facilitated by the project.

Furthermore, in the interest of cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary. The project is a response to housing demand that, if not fulfilled by the project, would likely result in new construction elsewhere, with associated increased in commuter VMT The energy used to construct the project is necessary because the project is intended to meet existing housing demands. Therefore, project demolition and construction activities would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

Operation

Energy demand from project operation would include fuel consumed by passenger vehicles;; and electricity consumed by residential buildings including, but not limited to lighting, water conveyance, and air conditioning.

The project aims to provide housing opportunities in urbanized areas near jobs, transit, services, and schools, limiting the increase in travel required by new residents. The project also identified Rezoning Sites in existing Urban Service Areas and would encourage development on infill sites, which similarly would ensure that new residences are proximate to commercial, retail, and employment destinations, limiting the number and length of typical residential vehicle trips.

As shown in Table 4.6-3, vehicle trips related to the project would require approximately 1,411,818 gallons of gasoline and 398,360 gallons of diesel fuel, or 205,773 MMBtu annually (see Appendix NRG for energy calculation sheets). This equates to a 72.9 thousands of Btu (kBtu) per capita daily transportation energy use for the project.[1] This is substantially lower than the County's 2018 average daily per capita transportation energy use of 130.0 kBtu (refer to Table 4.6-1). Gasoline and diesel fuel demands would be met by existing gasoline stations in the vicinity of the Rezoning Sites. Furthermore, vehicles driven by future residents of development facilitated by the project would be subject to increasingly stringent State fuel efficiency standards, thereby minimizing the potential for the inefficient consumption of vehicle fuels. As a result, vehicle fuel consumption resulting from the project would not be wasteful, inefficient, or unnecessary.

[1] Calculation: Annual fuel consumption (205,773 MMBtu, or 205,773,000 kBtu) divided by 365 days and divided by the total new residents (7,735 residents).

Table 4.6-3 Project Operational Energy Usage

Source	Energy Consumption	Energy Consumption (in MMBtu)
Vehicle Trips		
Gasoline	1,411,818 gallons	154,998
Diesel	398,360 gallons	50,775
Built Environment		
Electricity	16,623,500 kWh	56,719
Natural Gas Usage	86,468,600 kBtu	86,469

Note: MMBtu = millions of British thermal units; kWh = kilowatt-hours; kBtu = thousands of British thermal units.

See Appendix AQ for CalEEMod default values for fleet mix and average distance of travel and Appendix NRG for energy calculation sheets.

As shown in Table 4.6-3, in addition to transportation energy use, development facilitated by the projects would require permanent grid connections for electricity and natural gas. Development facilitated by the project would consume approximately 216,623,500 kilowatt-hours (kWh), or 56,719 MMBtu per year of electricity for lighting and large appliances, and approximately 86,468,600 kBtu, or 86,469 MMBtu per year of natural gas for heating and cooking (see Appendix AQ for CalEEMod results). Electricity would be provided by on-site solar, SCP (the default electricity provider in the County), and/or PG&E. SCP provides electricity from cleaner power sources with lower GHG emissions than PG&E, although customers can opt out of SCP service and be provided electricity from PG&E. PG&E would supply natural gas. As discussed in detail in Section 4.8, *Greenhouse Gas Emissions*, the 2019 Building Energy Efficiency Standards require installation of solar photovoltaic systems for single-family homes and multi-family buildings of three stories and less to supply much of the on-site electricity demand. Given historic electricity use, CEC's and CPUC's long-range planning efforts, and future on-site solar generation, there would be adequate capacity to meet demand for electricity. Furthermore, California natural gas demand, including volumes not served by utility systems, is expected to decrease at a rate of 1 percent per year from 2020 to 2035; therefore, the incremental increase in natural gas consumption from development facilitated by the project would not indirectly result in the need to secure additional natural gas supplies or construct new or expanded natural gas processing plants (California Gas and Electric Utilities [CGEU] 2020).

Development facilitated by the project would comply with the 2019 California Building Energy Efficiency Standards for Residential Buildings and CALGreen (CCR Title 24, Parts 6 and 11) or later versions, which are anticipated to be more stringent than the 2019 codes. The 2019 standards require the provision of electric vehicle charging equipment, water-efficient plumbing fixtures and fittings, recycling services, solar on low-rise (three stories and less) residential development, and other energy efficiency measures that would reduce the potential for the inefficient use of energy.

The anticipated 8,246 new residents that would be accommodated by development facilitated by the project are likely already living in the County or within the Bay Area under Association of Bay Area Governments (ABAG) jurisdiction, and therefore they would not create substantial energy demands in the region beyond that which they consume at this time. The County's RHNA allocation, which represents the minimum number of housing units that the County is required to plan for, is 3,881 units for the 2023-2031 planning period (6th RHNA cycle). Furthermore, the County has identified a need for higher-density housing in unincorporated areas, as well as replacement housing due to structure loss from the 2017 Sonoma Complex Fires, 2019 Kincade Fire, 2020 Glass Fire, and 2020 LNU Lightning Complex fires (refer to Section 4.14, *Population and Housing*). The

project would encourage the development of modern residential buildings, which would consume less energy in the forms of electricity and natural gas than existing, older buildings on the Rezoning Sites and in the surrounding areas. As described above, development facilitated by the project would not result in a wasteful, inefficient, or unnecessary consumption of energy, and would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. Impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact ENR-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT AN APPLICABLE RENEWABLE ENERGY OR ENERGY EFFICIENCY PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.6.2, *Regulatory Setting*, several state plans as well as the County's adopted General Plan include energy conservation and energy efficiency strategies intended to enable the State and the County to achieve GHG reduction and energy conservation goals. A full discussion of the proposed project's consistency with GHG reduction plans is included in Section 4.8, *Greenhouse Gas Emissions*. As shown in Table 4.6-4, development facilitated by the project would be consistent with State renewable energy and energy efficiency plans.

Table 4.6-4 Consistency with State Renewable Energy and Energy Efficiency Plans

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
Assembly Bill 2076: Reducing Dependence on Petroleum. Pursuant to AB 2076, the CEC and CARB prepared and adopted a joint-agency report, *Reducing California's Petroleum Dependence,* in 2003. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT. One of the performance-based goals of AB 2076 is to reduce petroleum demand to 15 percent below 2003 demand.	**Consistent.** As described above, the proposed project would establish a higher-density zoning allowances on the Rezoning Sites, in existing Urban Service Areas largely near incorporated cities. This establishment of higher-density housing in these areas would serve to reduce VMT by placing new housing close to typical destinations, such as commercial and office areas.
2019 Integrated Energy Policy Report. The 2019 report highlights the implementation of California's innovative policies and the role they have played in establishing a clean energy economy, as well as provides more detail on several key energy policies, including decarbonizing buildings, increasing energy efficiency savings, and integrating more renewable energy into the electricity system.	**Consistent.** The proposed project would establish a higher-density zoning allowance on the Rezoning Sites and would be required to comply with the County Code, Section 7-13, which mandates the implementation of Title 24. Compliance would include rooftop solar on all residential building types that are three stories or less in height. Electricity would be provided either by PG&E or SCP, which source some or all their power from renewable sources. Given these features, the project would facilitate decarbonization of buildings (removing GHG emissions from the building's energy use), the increase in energy

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
	efficiency savings, and integration of more renewable energy into the electricity system. Therefore, the project would not conflict with or obstruct implementation of the 2019 Integrated Energy Policy Report.
California Renewable Portfolio Standard. California's RPS obligates investor-owned utilities, energy service providers, and community choice aggregators to procure 33 percent total retail sales of electricity from renewable energy sources by 2020, 60 percent by 2030, and 100 percent by 2045.	**Consistent.** SCP and PG&E supply electricity in the County and they are required to generate electricity that would increase renewable energy resources to 60 percent by 2030 and 100 percent by 2045. Because SCP and PG&E would provide electricity service to the Rezoning Sites, the proposed project would not conflict with or obstruct implementation of the California Renewable Portfolio Standard.
AB 1493: Reduction of Greenhouse Gas Emissions. AB 1493 requires CARB to develop and adopt regulations that achieve maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, light-duty trucks, and other vehicles used for noncommercial personal transportation in California.	**Consistent.** Vehicles used by future residents of the Rezoning Sites would be subject to the regulations adopted by CARB pursuant to AB 1493. Therefore, the proposed project would not conflict with or obstruct implementation of AB 1493.
Energy Action Plan. In the October 2005, the CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the EAP II in February 2008 that supplements the earlier EAPs and examines the state's ongoing actions in the context of global climate change. The nine major action areas in the EAP include energy efficiency, demand response, renewable energy, electricity adequacy/reliability/infrastructure, electricity market structure, natural gas supply/demand/infrastructure, transportation fuels supply/demand/infrastructure, research/development/demonstration, and climate change.	**Consistent.** The project would be required to comply with the County Code, Section 7-13, which mandates the implementation of Title 24. Compliance would include rooftop solar on all residential building types that are three stories or less in height. Electricity would be provided either by PG&E or SCP, which source some or all their power from renewable sources. Given these features, the project would facilitate implementation of the nine major action areas in the EAP. Therefore, the project would not conflict with or obstruct implementation of the EAP.
AB 1007: State Alternative Fuels Plans. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality. **Bioenergy Action Plan, EO S-06-06.** The EO establishes the following targets to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050.	**Consistent**. The project would result in a rezoning of sites for medium-density housing in the Unincorporated County and would not interfere with or obstruct the production of biofuels in California. Vehicles used by future residents would be fueled by gasoline and diesel fuels blended with ethanol and biodiesel fuels as required by CARB regulations. Therefore, the project would not conflict with or obstruct implementation of the Bioenergy Action Plan or the State Alternative Fuels Plan.

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
Title 24, CCR – Part 6 (Building Energy Efficiency Standards) and Part 11 (CALGreen). The 2019 Building Energy Efficiency Standards move toward cutting energy use in new homes by more than 50 percent and will require installation of solar photovoltaic systems for single-family homes and multi-family buildings of three stories and less. The CALGreen Standards establish green building criteria for residential and nonresidential projects. The 2019 Standards include the following: increasing the number of parking spaces that must be prewired for electric vehicle chargers in residential development; requiring all residential development to adhere to the Model Water Efficient Landscape Ordinance; and requiring more appropriate sizing of HVAC ducts.	**Consistent**. The project would be required to comply with the County Code, Section 7-13, which mandates the implementation of Title 24. Therefore, the project would not conflict with or obstruct implementation of the Title 24 standards.

The County General Plan includes various goals and policies that employ energy conservation and efficiency measures through an array of strategies. As shown in Table 4.6-5, development facilitated by the project would be consistent with the energy conservation and efficiency strategies contained in the County General Plan.

Table 4.6-5 Consistency with the County General Plan

Energy Efficiency Goal, Policy, or Strategy	Proposed Project Consistency
Goal OSRC-14: Promote energy conservation and contribute to energy demand reduction in the County. **Objective OSRC-14.2:** Encourage County residents and businesses to increase energy conservation and improve energy efficiency. Policy OSRC-14d: Support project applicants in incorporating cost effective energy efficiency that may exceed State standards. Policy OSRC-14e: Develop energy conservation and efficiency design standards for new development. Policy OSRC-14f: Use the latest green building certification standards, such as the Leadership in Energy and Environmental Design (LEED) standards, for new development.	**Consistent**. Development facilitated by the project would be required to comply with energy conservation regulations and policies applicable to new residential developments, including California's Energy Efficiency Standards (CCR Title 24, Part 6) and CALGreen. Development facilitated by the project would be required to comply with County energy conservation standards and would be constructed per the most recent energy efficiency standards, as required for new residential developments.
Objective OSRC-14.3: Reduce the generation of solid waste and increase solid waste reuse and recycling.	**Consistent.** As described in Section 4.18, *Utilities and Service Systems*, development facilitated by the project would comply with General Plan and Countywide Integrated Waste Management Plan policies that address solid waste generation and disposal through increasing solid waste diversion and providing residential recycling services.
Objective OSRC-15.2: Promote the use of renewable energy and distributed energy generation systems and facilities in new development in the County.	**Consistent.** Development facilitated by the project would be required to comply with the County Code, Section 7-13, which mandates the implementation of Title 24. Compliance would include rooftop solar on all residential building types that are three stories or less in height.

Energy Efficiency Goal, Policy, or Strategy	Proposed Project Consistency
Policy OSRC-16b: Encourage public transit, ridesharing and van pooling, shortened and combined motor vehicle trips to work and services, use of bicycles, and walking. Minimize single passenger motor vehicle use. **Objective CT-1.8:** Improve demand for transit by development of a growth management strategy encouraging projects in urbanized areas that decrease distance between jobs and housing, increase the stock of affordable housing, and increase density. Policy CT-1m: Require development projects contribute a fair share for development of alternative transportation mode facilities, including pedestrian and bicycle facilities along project frontages and links from these to nearby alternative mode facilities. Development near urban boundaries should provide safe access to the urban area. Policy CT-3oo: Require new development in Urban Service Areas and unincorporated communities to provide safe, continuous and convenient pedestrian access to jobs, shopping and other local services and destinations. Maintain consistency with City standards for pedestrian facilities in Urban Service Areas that are within a city's Sphere of Influence or Urban Growth Boundary.	**Consistent**. The project would locate residences in urban service areas in general proximity to existing and planned commercial and retail land uses, which would encourage the use of alternative modes of transportation, as well as in the vicinity of existing transit routes and bicycle/pedestrian paths. Development facilitated by the project would be required to pay impact fees required by the County and be designed to include pedestrian access continuity where appropriate and required by the County.

The proposed project would be consistent with the County's adopted energy conservation and efficiency strategies contained in its General Plan. As described under Impact ENR-1, development facilitated by the project would be required to comply with relevant provisions of Title 24 of the California Energy Code, including CALGreen, which would also ensure compliance with the County's Climate Change Action Resolution. Therefore, this impact would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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4.7 Geology and Soils

This section evaluates the potential impacts relating to geology and soils impacts associated with implementation of the proposed project.

4.7.1 Setting

a. Regional Geology

The topography in Sonoma County is varied, including several mountain ranges, distinctive valleys, and coastal terraces. The County is bounded on the south by the San Pablo Bay and associated wetlands. The Cotati and Petaluma Valleys create the wide basin stretching from Santa Rosa to the Bay. Rolling hills and grasslands predominate here, as well as in Marin County to the south. The rugged Mayacamas and Sonoma Mountains geographically form the eastern boundary and physically separate Sonoma County from Lake and Napa Counties. The Sonoma Valley runs north-south between the Sonoma Mountains on the west and the taller Mayacamas Mountains to the east. The Geysers geothermal field, located in the northeastern section of the County, extends into both Sonoma and Lake Counties. The Mendocino Highlands form a common geographic unit with Mendocino County to the north. The Alexander Valley runs from northwest to southeast, bounded on the east by the Mayacamas Mountains and on the west by the Coast Range. The Pacific Ocean forms the western County boundary, including an interesting assemblage of steep hills, marine terraces, beaches, and offshore sea stacks (County of Sonoma 2006).

Ongoing tectonic forces resulting from the collision of the North American Plate with the Pacific Plate, combined with more geologically recent volcanic activity, have resulted in mountain building and down warping of parallel valleys. The margin of the two tectonic plates is defined by the San Andreas Fault system: a broad zone of active, dormant, and inactive faults dominated by the San Andreas Fault which trends along the western margin of the County. This fault system results in the northwestern structural alignment that controls the overall orientation of the County's ridges and valleys. The land has been modified by more recent volcanic activity, evidenced by Mount St. Helena that visually dominates the northeastern part of the County. Erosion, sedimentation, and active faulting occurring in recent times have further modified Sonoma County's landscape to its current form (County of Sonoma 2006).

The geology of Sonoma County is a result of the past tectonic, volcanic, erosional, and sedimentation processes of the California Coast Range geomorphic province (California Geological Survey [CGS] 2002). A geomorphic province is a region of unique topography and geology that is readily distinguished from other regions based on its landforms and diastrophic history. The Coast Ranges extend about 600 miles from the Oregon border south to the Santa Ynez River in Santa Barbara County and are characterized by numerous north-south–trending peaks and valleys that range in elevation from approximately 500 feet above mean sea level to 7,581 feet above mean sea level at the highest summit. The basement rocks of the Coast Ranges include the Jurassic to Cretaceous rocks of the Franciscan Assemblage, which consist of over 55,000 feet of greywacke, greenstone, bluestone, metasedimentary rocks, and ophiolite sequences. During the Mesozoic and into the Cenozoic, the area of the present-day Coast Ranges was covered by marine waters, resulting in the thick accumulation of marine and nonmarine shale, sandstone, and conglomerate on the Franciscan basement rock. Later, these deposits were unconformably overlain by Paleocene to Pliocene continental shelf marine sedimentary rocks. During the Late Miocene to the Late Pliocene,

a mountain-building episode occurred in the vicinity of the present-day Coast Ranges, resulting in their uplift above sea level. Subsequently, from the late Pliocene to Pleistocene, extensive deposits of terrestrial material, including alluvial fans and fluvial sediments, were deposited in the Coast Ranges (Norris and Webb 1990). Tectonic deformation and sea level change related to Pleistocene climate fluctuations continued through the Quaternary Period, resulting in the formation of marine terrace platforms along the Coast Ranges.

b. Local Geologic Setting

Sonoma County Soils

Soils vary widely throughout the County, and there are over 250 soil types mapped within Sonoma County (County of Sonoma 2006). Rezoning Sites that may be vulnerable to specific soil hazards are listed in relevant sections below.

Seismic Hazards

Northern California is a region of high seismic activity. Like most counties in the region, Sonoma County is subject to risks associated with potentially destructive earthquakes. Earthquakes are most common along geologic faults that are planes of weakness or fractures along which rocks have been displaced. Most faults located within Sonoma County are part of the San Andreas Fault system which extends along most of the length of California and represents the boundary between the Pacific and North American plates of the earth's crust. The faults mapped by the California Division of Mines and Geology are those that show significant surface evidence of lateral or vertical movement in the past two million years (i.e., the Quaternary geologic period) and are defined as active or are considered to be potentially active (County of Sonoma 2006).

SURFACE RUPTURE

Surface rupture represents the breakage of ground along the surface trace of a fault, which is caused by the intersection of the fault surface area ruptured in an earthquake with the earth's surface. Fault displacement occurs when material on one side of a fault moves relative to the material on the other side of the fault. This can have particularly adverse consequences when buildings are located within the rupture zone. It is not feasible, from a structural or economic perspective, to design and build structures that can accommodate rapid displacement involved with surface rupture. Amounts of surface displacement can range from a few inches to tens of feet during a rupture event.

Faults are geologic hazards because of both surface fault displacement and seismic ground shaking that are distinct but related properties. Surface fault displacement results when the fault plane ruptures and that rupture surface extends to, or intersects, the ground surface. Surface fault rupture can be very destructive to structures constructed across active faults. However, the zone of damage is limited to a relatively narrow area along either side of the fault as opposed to seismic ground shaking damage that can be quite widespread. Faults are categorized as active, potentially active, and inactive. A fault is classified as active if it has moved during the Holocene time, which consists of approximately the last 11,000 years. A fault is classified as potentially active if it has experienced movement within Quaternary time, which is during the last 1.8 million years. Faults that have not moved in the last 1.8 million years are generally considered inactive.

The San Andreas, Healdsburg, Rodgers Creek, and Mayacamas faults are considered active faults for planning purposes (County of Sonoma 2006). The County General Plan Public Safety Element's Figure PS-1b shows that none of County's active faults are within two miles of any Rezoning Sites.

GROUND SHAKING

The major cause of structural damage from earthquakes is ground shaking. The intensity of ground motion expected at a particular site depends upon the magnitude of the earthquake, the distance to the epicenter, and the geology of the area between the epicenter and the property. Greater movement can be expected at sites located on poorly consolidated material, such as alluvium, within close proximity to the ruptured fault, or in response to a seismic event of great magnitude. Historically, Sonoma County has been impacted by ground shaking during major earthquakes in the seismically active Northern California region, and is likely to experience ground shaking from major earthquakes in the future.

LIQUEFACTION

Liquefaction is a seismic phenomenon in which loose, saturated granular and non-plastic fine-grained soils lose their structure/strength when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: 1) shallow groundwater within the top 50 feet of the ground surface; 2) low-density non-plastic soils; and 3) high-intensity ground motion. The following five sites contain soils with high or very high liquefaction levels: GUE-3, GUE-4, AGU-1, AGU-2, and AGU-3 (County of Sonoma 2006).

Landslides and Slope Stability

Seismic ground shaking can also result in landslides and other slope instability issues. Landslides occur when slopes become unstable and masses of earth material move downslope. Landslides are usually rapid events, often triggered during periods of rainfall or by earthquakes. Mudslides and slumps are a more shallow type of slope failure. They typically affect the upper surficial soils horizons rather than bedrock features. Usually mudslides and slumps occur during or soon after periods of rainfall, but they can be triggered by seismic shaking. Sonoma County contains several mountainous areas with high landslide susceptibility, including the Mayacamas and the Sonoma Mountains. The areas most susceptible to landslides are shown on maps prepared by the California Division of Mines and Geology. In addition, landslides occur where faults have fractured rock and along the base of slopes or cliffs where supporting material has been removed by stream or wave erosion, or human activities. Heavy rainfall, human actions, or earthquakes can trigger landslides. They may take the form of a slow continuous movement such as a slump or may move very rapidly as a semi-liquid mass such as a debris flow or avalanche. Table 4.7-1 lists the Rezoning Sites that contain soils with high and very high landslide susceptibility (CGS 2015).

Subsidence

Subsidence refers to the sinking of a large area of ground surface in which material is displaced vertically with little or no horizontal movement. Subsidence originates at great depths below the surface when subsurface pressure is reduced by the natural loss or human withdrawal of fluids, such as groundwater, natural gas, or oil, or can occur due to soil compression. This type of subsidence has thus far not been reported in Sonoma County (County of Sonoma 2006).

Table 4.7-1 Rezoning Sites with High or Very High Landslide Susceptibility

Rezoning Sites with High or Very High Landslide Susceptibility	
AGU-1	GRA-2
AGU-2	GUE-1
GEY-1	GUE-3
GEY-2	GUE-4
GEY-3	PEN-5
GEY-4	PEN-6
GLE-1	PEN-8
GLE-2	PET-4

Source: CGS 2015

Expansive Soils

Expansive soils swell with increases in moisture content and shrink with decreases in moisture content. These soils usually contain high clay content. Foundations for structures constructed on expansive soils require special design considerations. Because expansive soils can expand when wet and shrink when dry, they can cause foundations, basement walls and floors to crack, causing substantial structural damage. As such, structural failure due to expansive soils near the ground surface is a potential hazard. These types of soils can be found throughout Sonoma County (County of Sonoma 2006).

Soil Erosion

Erosion refers to the removal of soil by water or wind. Factors that influence erosion potential include the amount of rainfall and wind, the length and steepness of the slope, and the amount and type of vegetative cover. Depending on how well protected the soil is from these forces, the erosion process can be very slow or rapid. Properties of the soil also contribute to how likely or unlikely it is to erosion. Removal of natural or man-made protection can result in substantial soil erosion and excessive sedimentation and pollution problems in streams, lakes, and estuaries. Construction activities represent the greatest potential cause of erosion. Many areas of particular erosion concern in the County are steep hillsides cultivated for wine grapes, rangelands where overgrazing may occur, and some waterways with high stream bank erosion.

c. Paleontological Resources Setting

Paleontological resources (fossils) are the remains and/or traces of prehistoric life. Fossils are typically preserved in layered sedimentary rocks and the distribution of fossils is a result of the sedimentary history of the geologic units within which they occur. Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. Although it is not possible to determine whether a fossil will occur in any specific location, it is possible to evaluate the potential for geologic units to contain scientifically significant paleontological resources, and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they do occur during construction.

Paleontological Resource Potential

Paleontological resource potential refers to the probability of a geologic unit to produce scientifically significant fossils. Direct impacts to paleontological resources occur when earthwork activities, such as grading or trenching, cut into the geologic deposits within which fossils are buried and physically destroy the fossils. Since fossils are the remains of prehistoric animal and plant life, they are nonrenewable. Such impacts have the potential to be significant and, under the *CEQA Guidelines*, may require mitigation. Resource potential is determined by rock type, the history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit. Paleontological resource potential is derived from the known fossil data collected from the entire geologic unit, not just from a specific survey.

The discovery of a vertebrate fossil locality is of greater significance than that of an invertebrate fossil locality, especially if it contains a microvertebrate assemblage. The recognition of new vertebrate fossil locations could provide important information on the geographical range of the taxa, their radiometric age, evolutionary characteristics, depositional environment, and other important scientific research questions. Vertebrate fossils are almost always significant because they occur more rarely than invertebrates or plants. Thus, geological units having the potential to contain vertebrate fossils are considered the most sensitive.

The Society of Vertebrate Paleontology (SVP) outlines in its Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP 2010) guidelines for categorizing paleontological resource potential of geologic units within a project area. The SVP (2010) describes sedimentary rock units as having a high, low, undetermined, or no potential for containing significant nonrenewable paleontological resources. This criterion is based on rock units within which vertebrates or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. Significant paleontological resources are fossils or assemblages of fossils, which are unique, unusual, rare, uncommon diagnostically, stratigraphically, taxonomically, or regionally. The paleontological resource potential of the Rezoning Sites has been evaluated according to the following SVP (2010) categories, which are presented below.

HIGH RESOURCE POTENTIAL

Rock units from which significant vertebrate or significant invertebrate fossils or significant suites of plant fossils have been recovered are considered to have a high potential for containing significant non-renewable fossiliferous resources. These units include but are not limited to, sedimentary formations and some volcanic formations which contain significant nonrenewable paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils. Resource potential comprises both:

1. potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate, invertebrate, or botanical and
2. importance of recovered evidence for new and significant taxonomic, phylogenetic, ecologic, or stratigraphic data. Areas which contain potentially datable organic remains older than recent, including deposits associated with nests or middens, and areas that may contain new vertebrate deposits, traces, or trackways are also classified as significant. Low Resource Potential

Sedimentary rock units that are potentially fossiliferous, but have not yielded fossils in the past or contain common and/or widespread invertebrate fossils of well documented and understood taphonomic (processes affecting an organism following death, burial, and removal from the ground), phylogenetic species (evolutionary relationships among organisms), and habitat ecology.

Reports in the paleontological literature or field surveys by a qualified vertebrate paleontologist may allow determination that some areas or units have low resource potential for yielding significant fossils prior to the start of construction. Generally, these units will be poorly represented by specimens in institutional collections and will not require protection or salvage operations.

UNDETERMINED RESOURCE POTENTIAL

Specific areas underlain by sedimentary rock units for which little information is available are considered to have undetermined paleontological resource potential. Field surveys by a qualified vertebrate paleontologist to specifically determine the potentials of the rock units are required before programs of impact mitigation for such areas may be developed.

NO RESOURCE POTENTIAL

Rock units of metamorphic or igneous origin are commonly classified as having no resource potential for containing significant paleontological resources. For geologic units with no resource potential, a paleontological monitor is not required.

Rezoning Sites Geologic Units and Paleontological Potential

Characteristics and assessment of paleontological resource potential of geologic units are discussed in more detail in Appendix GEO. Refer to Figure 4.7-1 through Figure 4.7-11 and Table 4.7-2 for the geologic units and paleontological resource potential within the 59 Rezoning Sites.

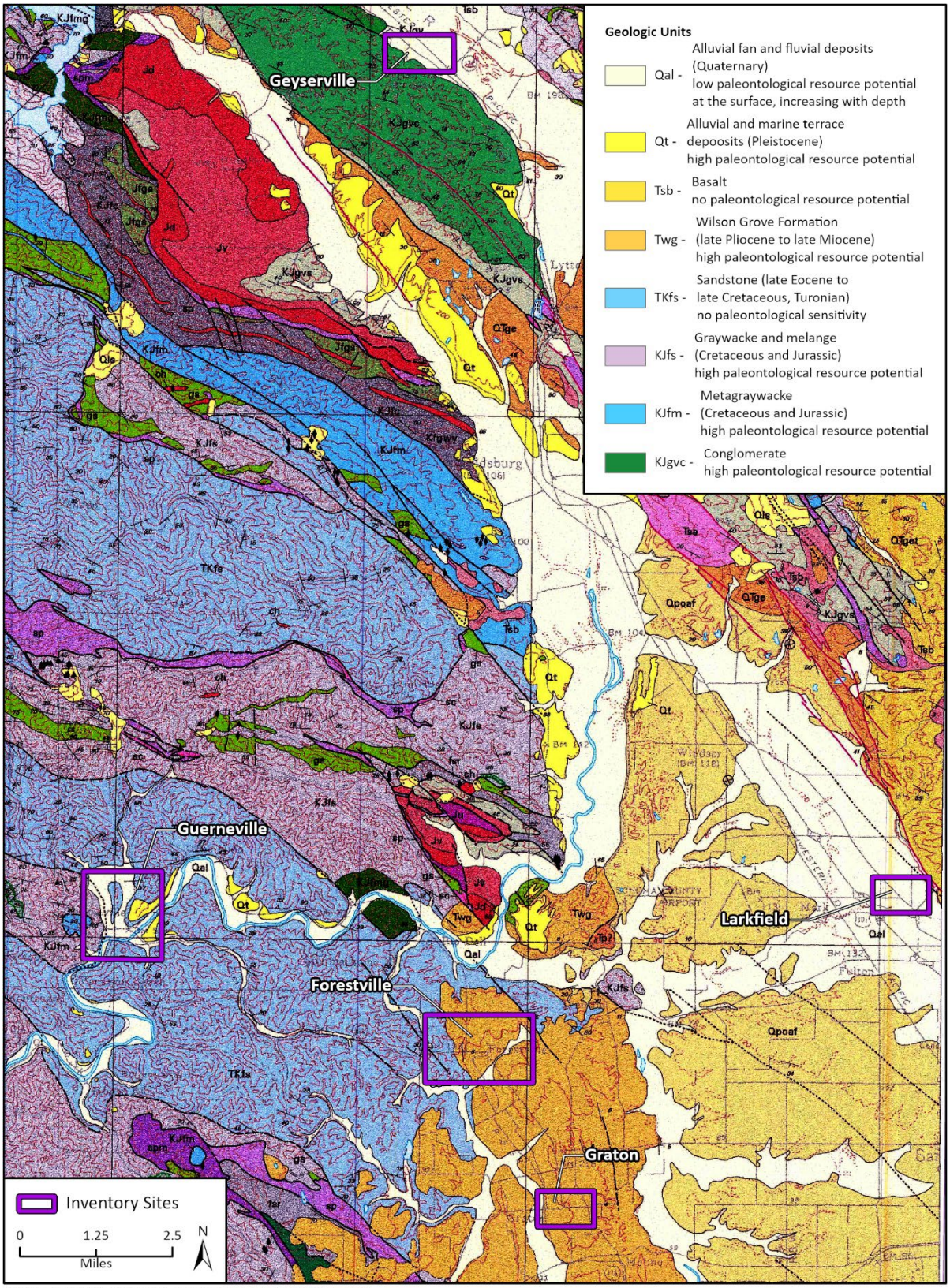
Table 4.7-2 Geologic Units and Paleontological Resource Potential Summary of the Rezoning Sites

Rezoning Sites	Geologic Unit(s)[1]	Paleontological Resource Potential[2]
GEY-1 through GEY-3, GUE-2 through GUE-4, LAR-1 through LAR-8, SAN-1, SAN-3, SAN-5, SAN-10	Quaternary young alluvium (Q, Qal)	Low
GEY-4	Quaternary young alluvium (Q, Qal) Early Cretaceous to Late Jurassic Great Valley Complex (KJgvc)	Low
GUE-1	Quaternary old alluvial and marine terrace deposits (Qt)	High
FOR-1 through FOR-6, GRA-1, GRA-3 through GRA-5, PET-1 through PET-3	Wilson Grove Formation (Twg, Pwg)	High
GRA-2	Quaternary young alluvium (Qal)	Low
SAN-2, SAN-4, SAN-6 through SAN-9, AGU-1 through AGU-3, SON-1 through SON-4	Quaternary old alluvium (Qo)	High
GLE-1, GLE-2	Huichica and Glen Ellen Formations (QT)	High
PEN-1 through PEN-9	Petaluma Formation (Pp)	High
PET-4	Wilson Grove Formation (Twg, Pwg) Pliocene to Miocene Sonoma Volcanics (Psv, Tsb)	High None

[1] Blake et al. 2000; 2002; Wagner and Bortugno 1982

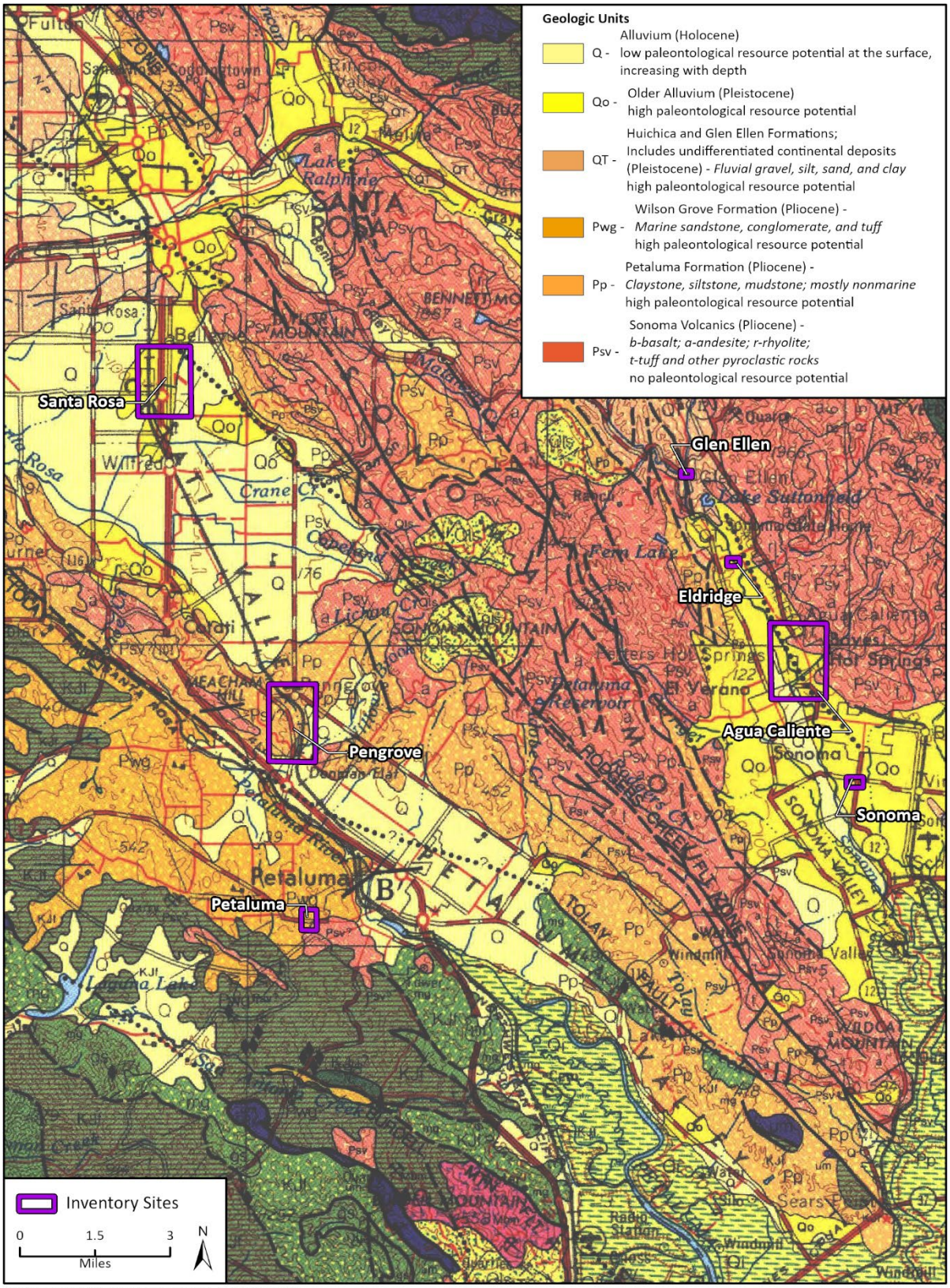
[2] SVP 2010; University of California Museum of Paleontology 2020

Figure 4.7-1 Geologic Units and Paleontological Resource Potential – Northern County



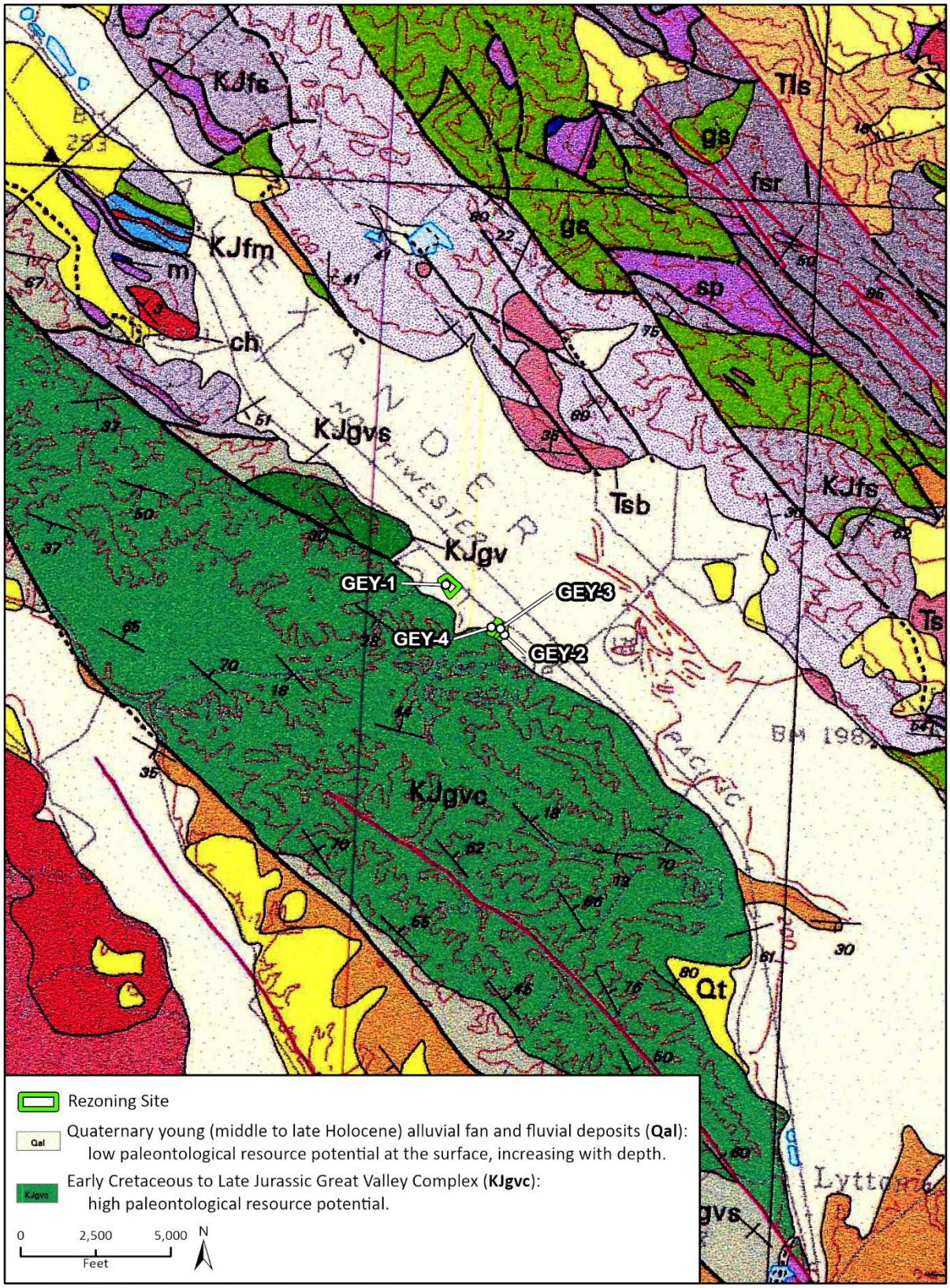
Imagery provided by Blake, M.C., Graymer, R.W., and Stamski, R.E., 2002

Figure 4.7-2 Geologic Units and Paleontological Resource Potential – Southern County



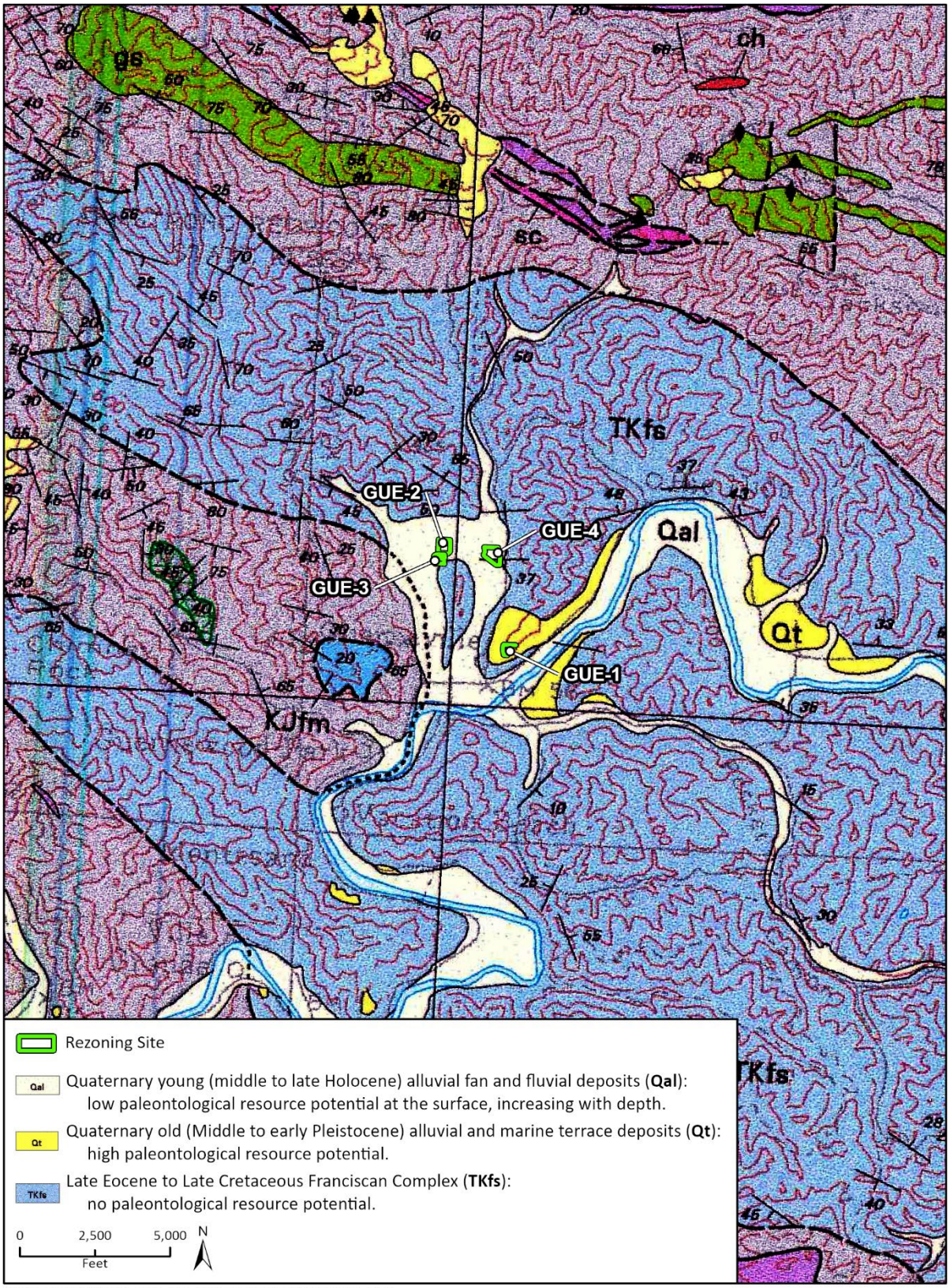
Imagery provided by D.L. Wagner and E.J. Bortugno, 1982.

Figure 4.7-3 Geologic Units and Paleontological Resource Potential – Geyserville



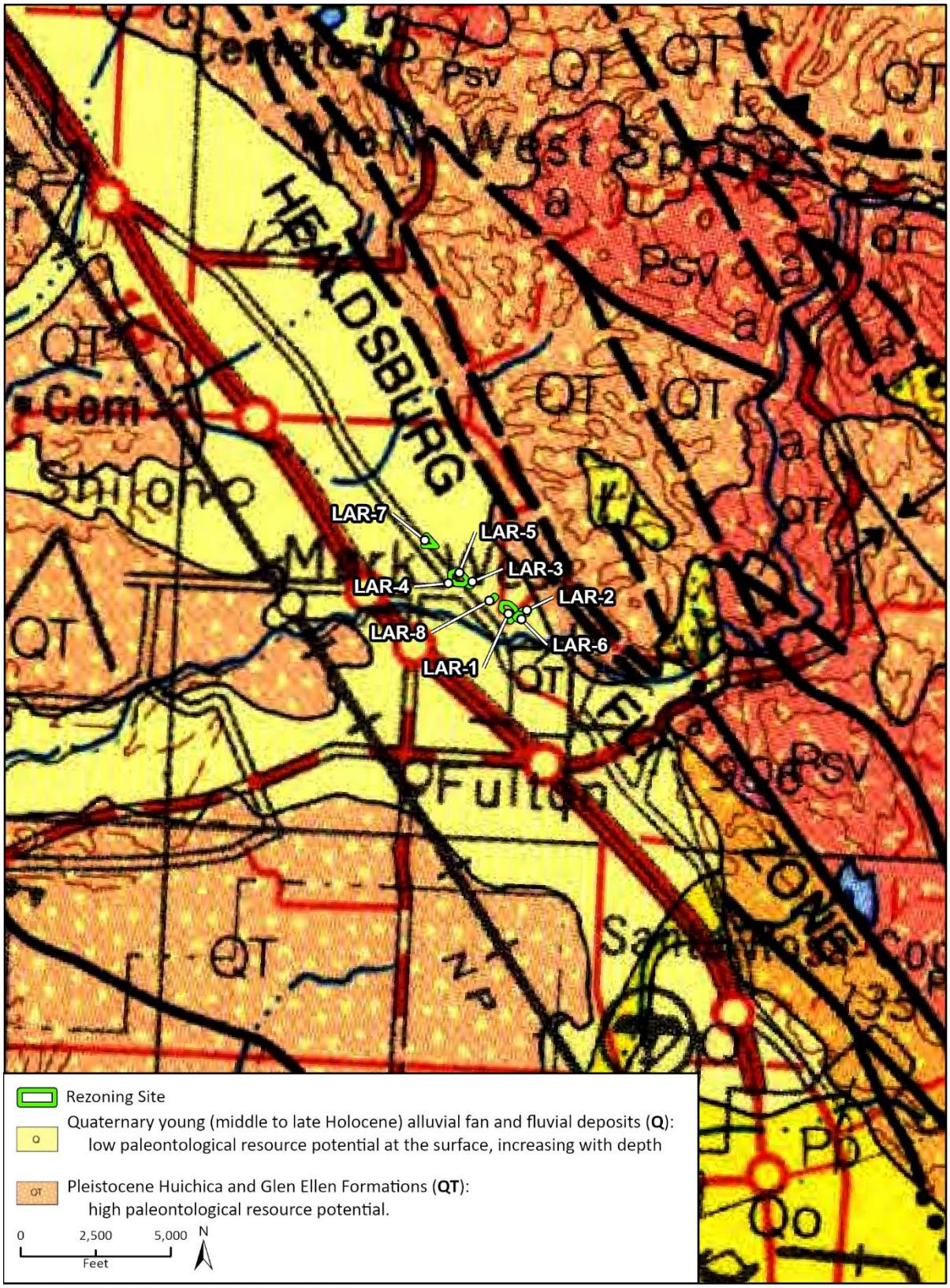
Imagery provided by Esri, Blake, M.C., Graymer, R.W., and Stamski, R.E., 2002.

Figure 4.7-4 Geologic Units and Paleontological Resource Potential – Guerneville



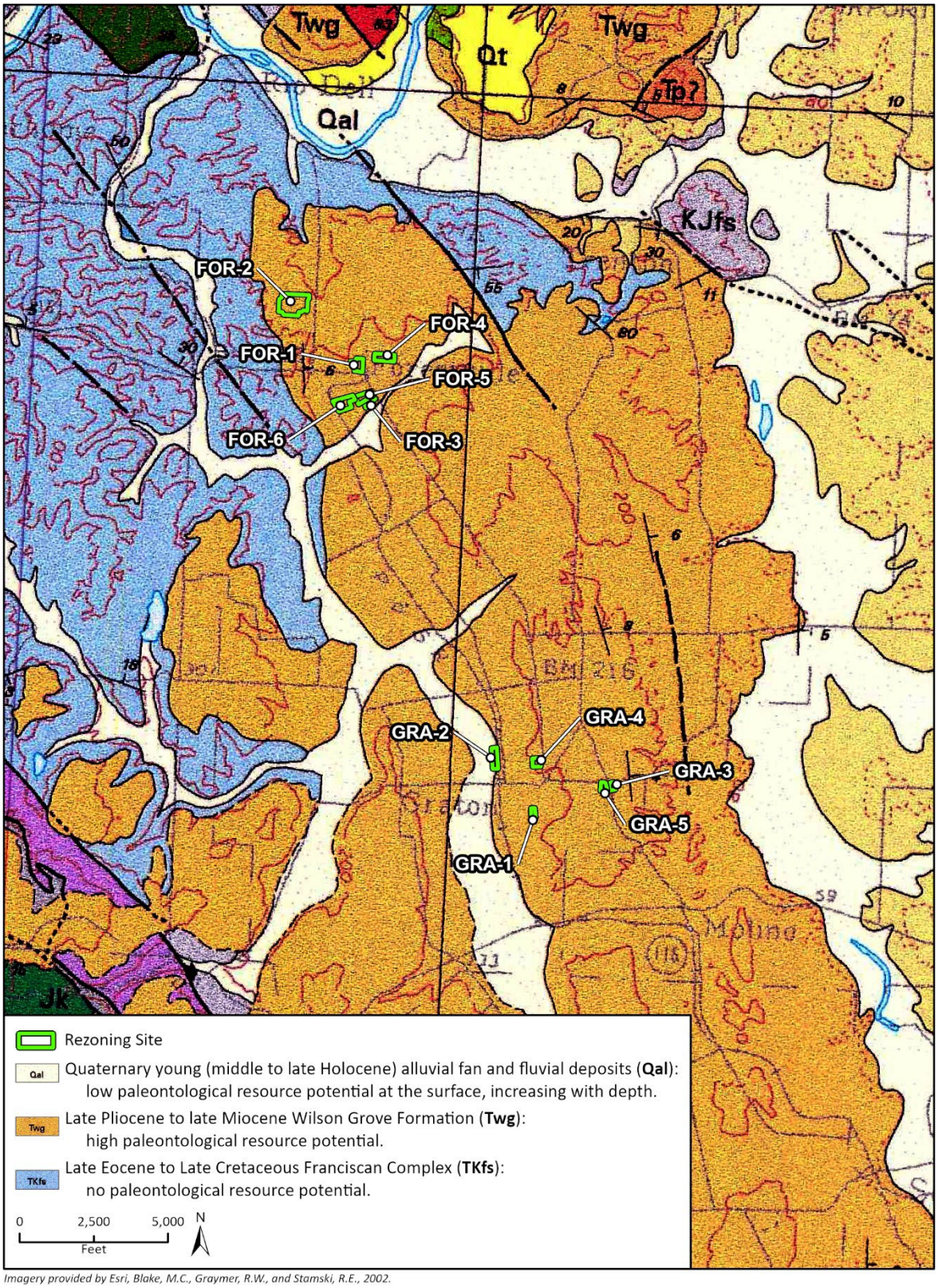
Imagery provided by Esri, Blake, M.C., Graymer, R.W., and Stamski, R.E., 2002.

Figure 4.7-5 Geologic Units and Paleontological Resource Potential –Larkfield



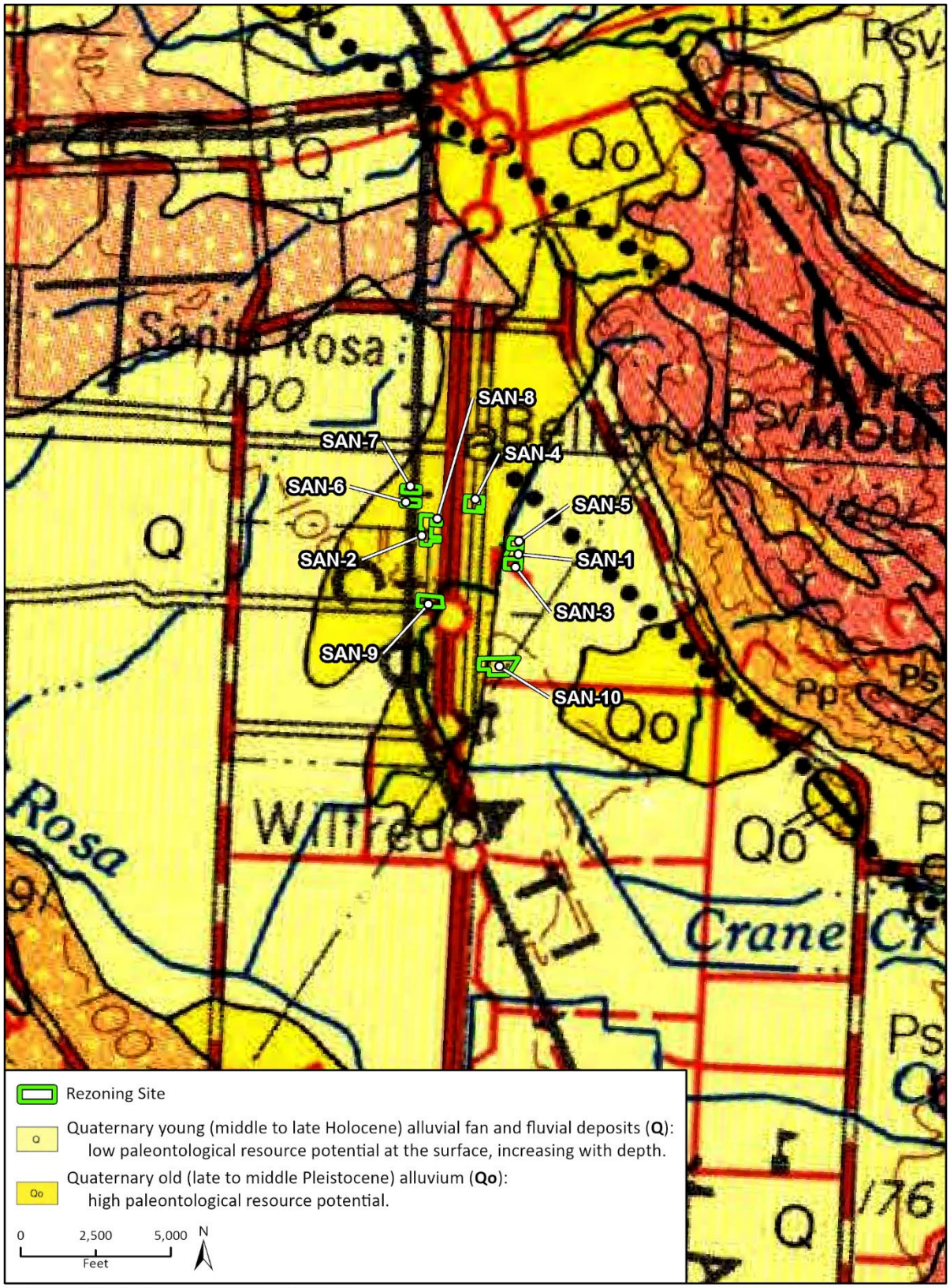
Imagery provided by Esri, 2020; D.L. Wagner and E.J. Bortugno, 1982.

Figure 4.7-6 Geologic Units and Paleontological Resource Potential – Forestville and Graton



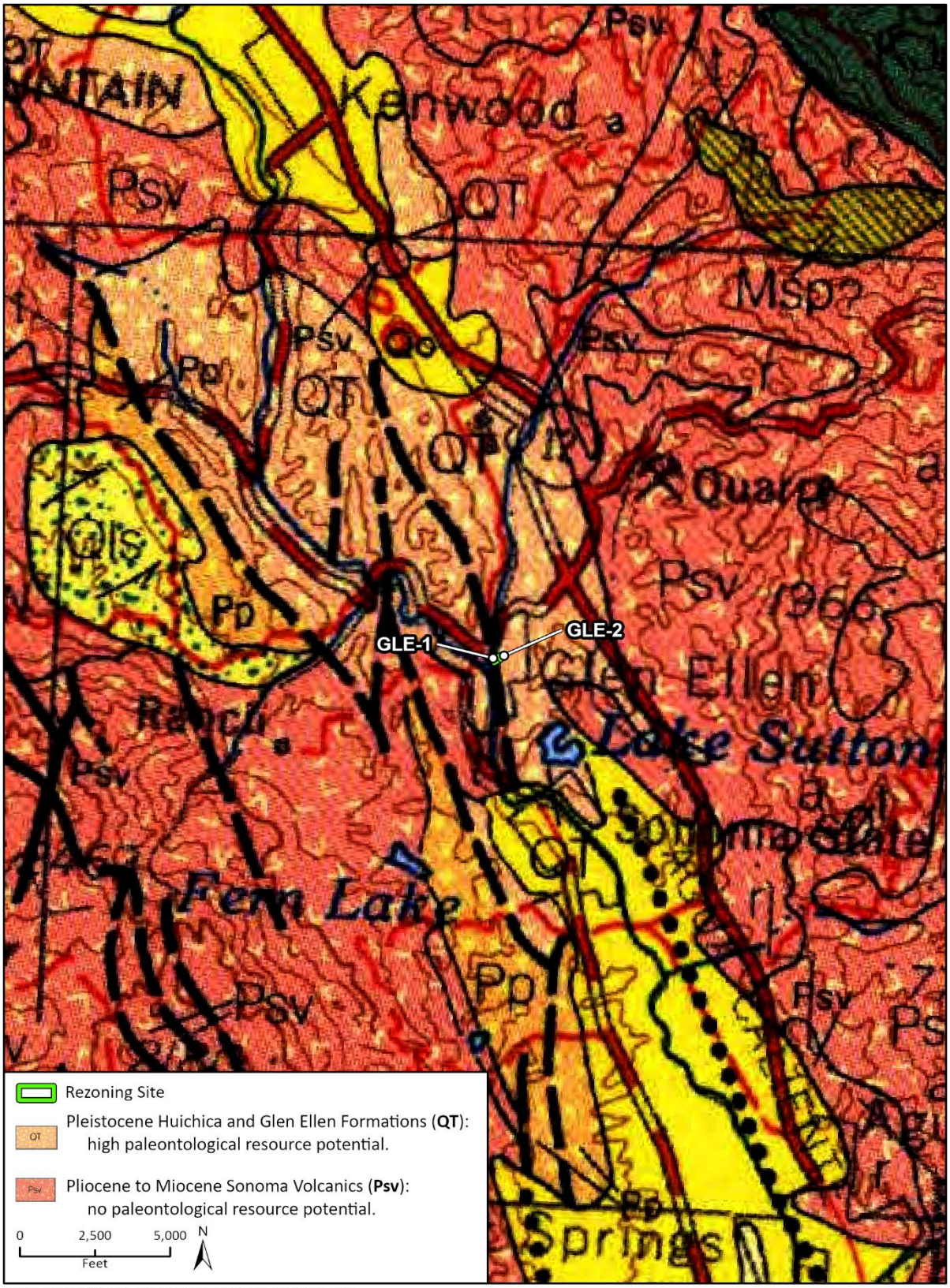
Imagery provided by Esri, Blake, M.C., Graymer, R.W., and Stamski, R.E., 2002.

Figure 4.7-7 Geologic Units and Paleontological Resource Potential – Santa Rosa



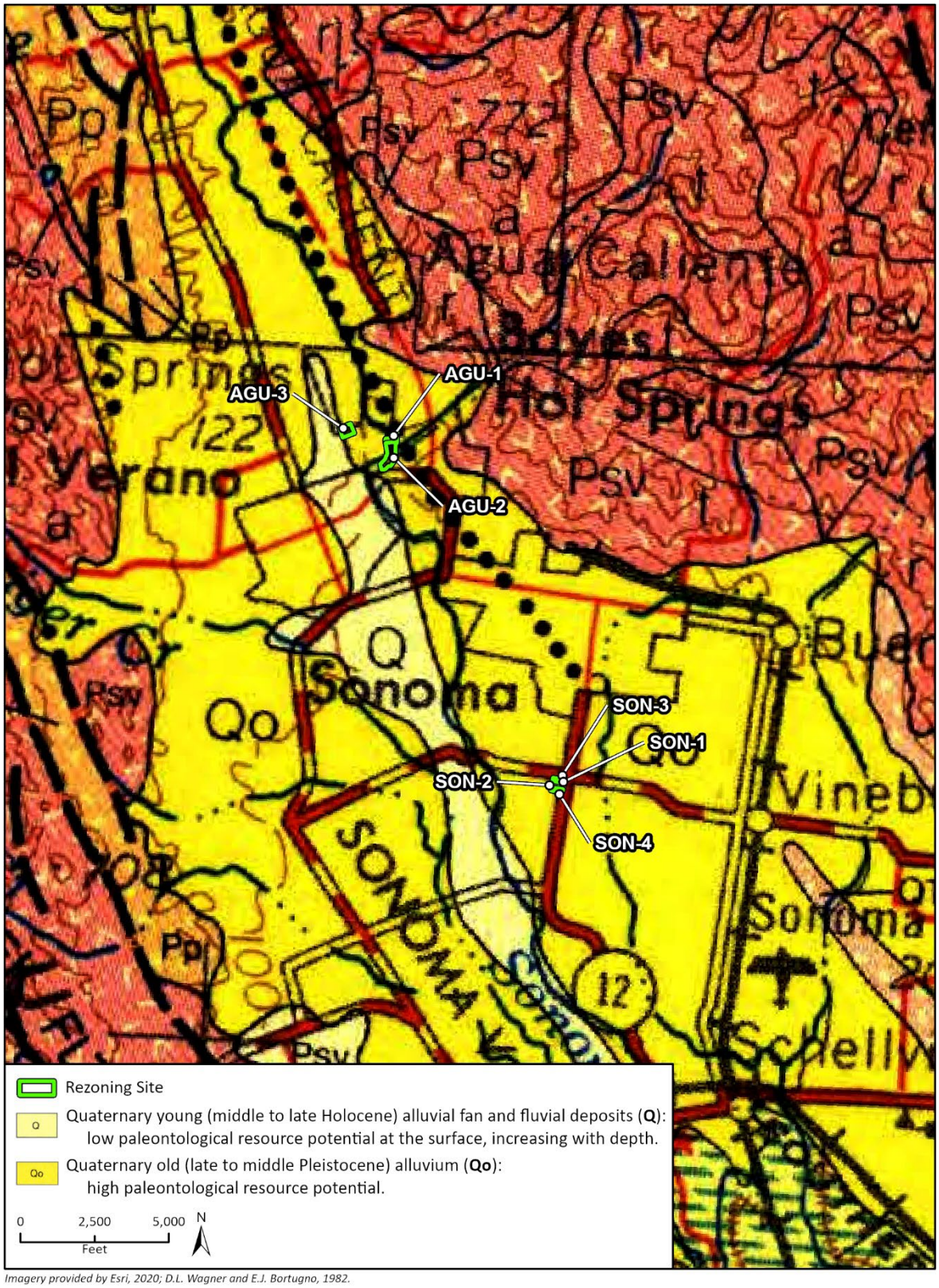
Imagery provided by Esri, 2020; D.L. Wagner and E.J. Bortugno, 1982.

Figure 4.7-8 Geologic Units and Paleontological Resource Potential – Glen Ellen



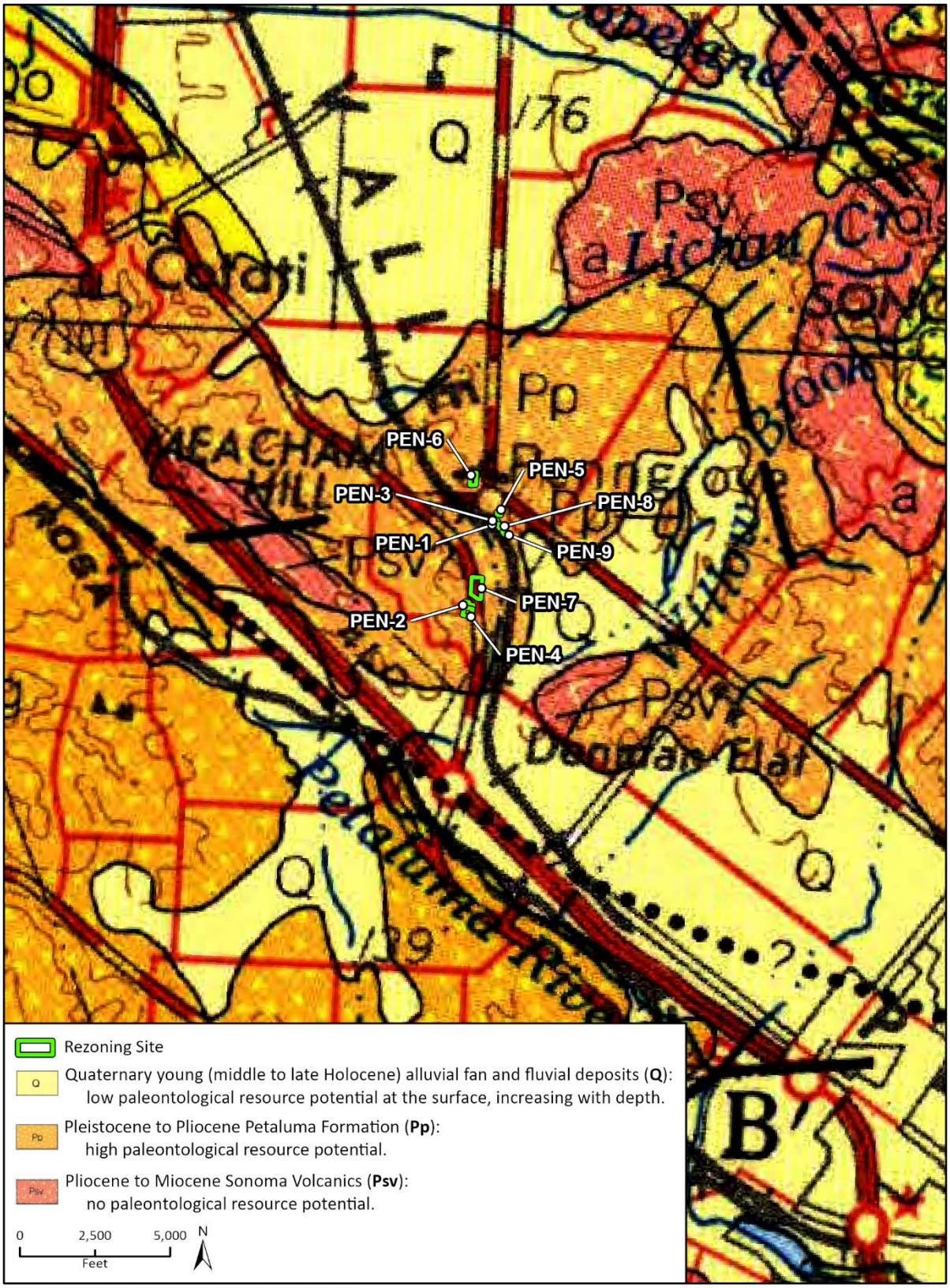
Imagery provided by Esri, 2020; D.L. Wagner and E.J. Bortugno, 1982.

Figure 4.7-9 Geologic Units and Paleontological Resource Potential – Agua Caliente and Sonoma



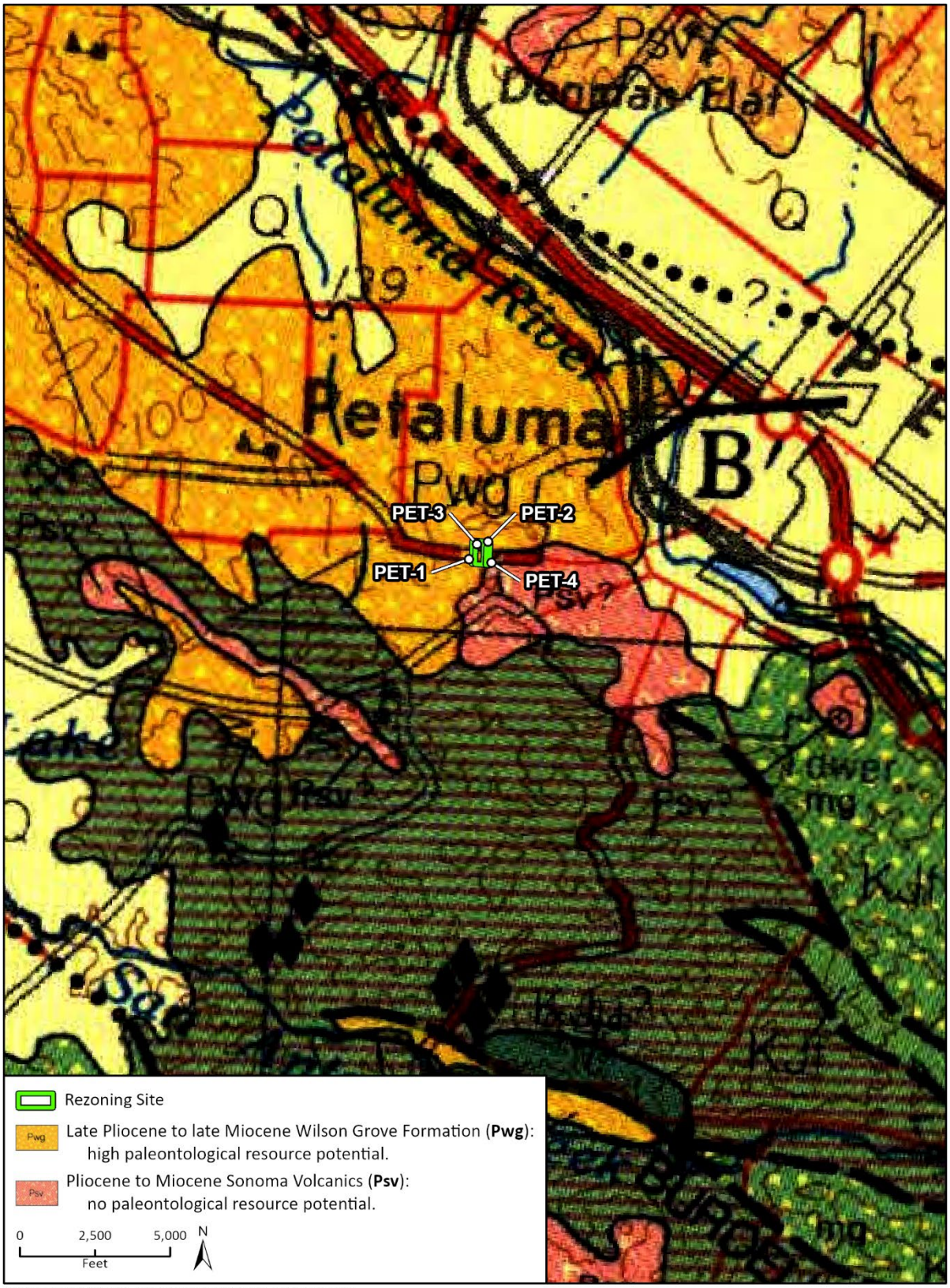
Imagery provided by Esri, 2020; D.L. Wagner and E.J. Bortugno, 1982.

Figure 4.7-10 Geologic Units and Paleontological Resource Potential – Penngrove



Imagery provided by Esri, 2020; D.L. Wagner and E.J. Bortugno, 1982.

Figure 4.7-11 Geologic Units and Paleontological Resource Potential – Petaluma



Imagery provided by Esri, 2020; D.L. Wagner and E.J. Bortugno, 1982.

4.7.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

Congress enacted the Clean Water Act (CWA), formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). NPDES permitting authority is administered by the California State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCB). In Sonoma County, the Sonoma Creek and Petaluma River watersheds are in the San Francisco Bay RWQCB jurisdiction, and the remainder of the County is governed by the North Coast RWQCB (refer to Section 4.10, *Hydrology and Water Quality* for more information about watersheds in Sonoma County).

Projects within the County that disturb more than one acre would be required to obtain NPDES coverage under the California General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) describing best management practices (BMP) the discharger would use to prevent and retain storm water runoff and to prevent soil erosion.

U.S. Geological Survey Landslide Hazard Program

The USGS created the Landslide Hazard Program in the mid-1970s; the primary objective of the program is to reduce long-term losses from landslide hazards by improving our understanding of the causes of ground failure and suggesting mitigation strategies. The federal government takes the lead role in funding and conducting this research, whereas the reduction of losses due to geologic hazards is primarily a State and local responsibility. In Sonoma County, plans and programs designed for the protection of life and property are coordinated by the Sonoma County Office of Emergency Management.

b. State Regulations

California Building Code

The California Building Code (CBC) Title 24, Part 2 provides building codes and standards for the design and construction of structures in California. The 2016 CBC is based on the 2015 International Building Code with the addition of more extensive structural seismic provisions. Chapter 16 of the CBC contains definitions of seismic sources and the procedure used to calculate seismic forces on structures.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 was passed into law following the destructive February 9, 1971, magnitude 6.6 San Fernando earthquake. The Act provides a mechanism for reducing losses from surface fault rupture on a statewide basis. The intent of the Act is to ensure public safety by prohibiting the siting of most structures for human occupancy across

traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. This Act groups faults into categories of active, potentially active, and inactive. Historic and Holocene age faults are considered active, Late Quaternary and Quaternary age faults are considered potentially active, and pre-Quaternary age faults are considered inactive.

The Alquist-Priolo Earthquake Fault Zoning Act regulates development near the surface traces of active faults to mitigate the hazard of surface fault rupture. Essentially, this Act contains two requirements: (1) it prohibits the location of most structures for human occupancy across the trace of active faults; and (2) it establishes Earthquake Fault Zones and requires geologic/seismic studies of most proposed development within 1,000 feet of the zone. The Earthquake Fault Zones are delineated and defined by the State Geologist and identify areas where potential surface rupture along a fault could occur. In Sonoma County, the Geologic Hazard Combining District (G District) is applied to properties located within the Alquist-Priolo Earthquake Fault Zone. None of the Rezoning Sites are located within the G District, and accordingly none are located within an Earthquake Fault Zone.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (the Act) of 1990 was passed into law following the destructive October 17, 1989, magnitude 6.9 Loma Prieta earthquake. The Act directs the CGS to delineate Seismic Hazard Zones. The purpose of the Act is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards, such as liquefaction, landslides, amplified ground shaking, and inundation by tsunami or seiche. Cities, counties, and State agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. The Act requires that site-specific geotechnical investigations be performed prior to permitting most urban development projects within seismic hazard zones. CGS maintains these required maps.

California Public Resources Code

Section 5097.5 of the Public Resources Code states:

> No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

Here “public lands” means those owned by, or under the jurisdiction of, the state or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with Public Resources Code Section 5097.5 for their own activities, including construction and maintenance, and for permit actions (e.g., encroachment permits) undertaken by others.

c. Local Regulations

Please refer to Section 4.10, *Hydrology and Water Quality*, for a discussion of various water quality related permits and requirements, including the Municipal Separate Storm Sewer System Permit, Standard Urban Storm Water Mitigation Plan, and Low Impact Development Manual.

Sonoma County Code

The Geologic Hazard Combining District (G District) was added to the Zoning Regulations (Chapter 26 of the Sonoma County Code) in 1993 to reduce unnecessary exposure of people and property to risks of damage or injury from earthquakes, landslides, and other geologic hazards. The G District is applied to areas located within the Alquist-Priolo Earthquake Fault Zone (County of Sonoma 2014). All uses permitted within the zoning districts with which the G District is combined are permitted, except that no structure intended for human occupancy or otherwise defined as a project in the Alquist-Priolo Earthquake Fault Zoning Act is permitted to be placed across the trace of an active fault or within 50 feet of the surface trace of any fault. A geologic report is required for development of property within the G District. No Rezoning Sites are located in a G District.

Sonoma County General Plan

The Public Safety Element of the Sonoma County General Plan (County of Sonoma 2014) includes a section regarding protection from geologic hazards, which include seismic hazards such as fault movement, ground shaking, ground failure, ground displacement along fault traces, tsunamis, secondary effects of earthquakes, landslide, and expansive soils, including:

Goal PS-1: Prevent unnecessary exposure of people and property to risks of damage or injury from earthquakes, landslides, and other geologic hazards.

Objective PS-1.1: Continue to develop and utilize use available data on geologic hazards and associated risks.

Objective PS-1.2: Regulate new development to reduce the risks of damage and injury from known geologic hazards to acceptable levels.

Objective PS-1.3: Use the Sonoma County Hazard Mitigation Plan to help reduce future damage from geologic hazards.

Policy PS-1a: Continue to use all available data on geologic hazards and related risks from the appropriate agencies.

Policy PS-1b: Continue to use studies of geologic hazards prepared during the development review process.

Policy PS-1e: Continue to implement the "Geologic Hazard Area" combining district which establishes regulations for permissible types of uses and their intensities and appropriate development standards.

Policy PS-1f: Require and review geologic reports prior to decisions on any project which would subject property or persons to significant risks from the geologic hazards areas shown on Public Safety Element hazard maps and related file maps and source documents. Geologic reports shall describe the hazards and include mitigation measures to reduce risks to acceptable levels. Where appropriate, require an engineer's or geologist's certification that risks have been mitigated to an acceptable level and, if indicated, obtain indemnification or insurance from the engineer, geologist, or developer to minimize County exposure to liability.

Policy PS-1g: Prohibit structures intended for human occupancy (or defined as a "project" in the Alquist-Priolo Special Studies Zones Act and related Administrative Code provisions) within 50 feet of the surface trace of any fault.

Goal PS-4: Prevent unnecessary exposure of people and property to risks of damage or injury from earthquakes, landslides, and other geologic hazards.

The Open Space and Resource Conservation Element of the Sonoma County General Plan contains the following policy relating to paleontological resources that are relevant and/or applicable to the current project:

> Policy OSRC-19j. Develop an archaeological and paleontological resource protection program that provides:
>
> 1. Guidelines for land uses and development on parcels identified as containing such resources
> 2. Standard project review procedures for protection of such resources when discovered during excavation and site disturbance
> 3. Educational materials for the building industry and the general public on the identification and protection of such resources

Sonoma County Multi-Jurisdictional Hazard Mitigation Plan

The Sonoma County Multi-Jurisdictional Hazard Mitigation Plan, updated October 2021, assesses the County's vulnerabilities to various hazards and presents mitigation strategy, including goals, objectives, and actions that the County will strive to implement over the next five years. These hazards include earthquakes and landslides. The hazard mitigation plan seeks to identify opportunities for reasonable mitigation actions and sets out a five-year implementation plan. For example, some identified actions to reduce seismic hazards include performing seismic retrofitting or replacement of County-owned bridges and providing seismic structural retrofits to mobile homes throughout the County.

Sonoma County Erosion Prevention and Sediment Control Policies

Permit Sonoma provides the following information regarding the County's requirements for erosion prevention and sediment control during building and construction activities (County of Sonoma 2016) that apply to development within the County:

1. Perform erosion prevention and sediment control in accordance with Chapters 11 and 11a of the Sonoma County Code.
2. The approved plans shall conform to Permit Sonoma erosion prevention and sediment control BMPs guide as posted on the Permit Sonoma website.
3. The property owner is responsible for preventing storm water pollution generated from the construction site year-round. Work sites with inadequate erosion prevention and/or sediment control may be subject to a stop work order and/or additional inspection fees to verify compliance with Sonoma County Code.
4. If discrepancies occur between these notes, material referenced on the approved plans or manufacturer's recommendations, then the most protective shall apply.
5. At all times the property owner is responsible for obtaining and complying with the state of California NPDES general permit for storm water discharges associated with construction and land disturbing activities such as clearing, grading, excavation, stockpiling, and reconstruction of existing facilities involving removal and replacement.
6. The property owner must implement an effective combination of erosion prevention and sediment control on all disturbed areas during the rainy season (October 1 - April 30). Grading

and drainage improvement shall be permitted during the rainy season only when on-site soil conditions permit the work to be performed in compliance with Sonoma County Code.

7. During the rainy season, storm water BMPs referenced or detailed in Permit Sonoma's BMP guide shall be implemented and functional on the site at all times and the area of erodible land exposed at any one time during the work shall not exceed one acre or 20 percent of the permitted work area, whichever is greater, and the time of exposure shall be minimized to the maximum extent practicable.
8. During the non-rainy season, on any day when the national weather service forecast is a chance of rain of 30 percent or greater within the next 24 hours, storm water BMPs referenced or detailed in Permit Sonoma's BMP guide shall be implemented and functional on the site to prevent soil and other pollutant discharges. At all other times, BMPs should be stored on site in preparation for installation prior to rain events.
9. Erosion prevention and sediment control BMPs shall be inspected by the property owner before foretasted storm events and after storm events to ensure BMPs are functioning properly. Erosion prevention and sediment control BMPs that have failed or are no longer effective shall be promptly replaced. Erosion prevention and sediment control BMPs shall be maintained until disturbed areas are stabilized.
10. The limits of grading shall be defined and marked on site to prevent damage to surrounding trees and other vegetation. Preservation of existing vegetation shall occur to the maximum extent practicable. Any existing vegetation within the limits of grading that is to remain undisturbed by the work shall be identified and protected from damage by marking, fencing, or other measures.
11. Changes to the erosion prevention and sediment control plan may be made to respond to field conditions if the alternative BMPs are equivalent or more protective than the BMPs shown on the approved plans. Alternative BMPs are subject to review and approval by Permit Sonoma staff.
12. Discharges of potential pollutants from construction sites shall be prevented using source controls to the maximum extent practicable. Potential pollutants include but are not limited to: sediment, trash, nutrients, pathogens, petroleum hydrocarbons, metals, concrete, cement, asphalt, lime, paint, stains, glues, wood products, pesticides, herbicides, chemicals, hazardous waste, sanitary waste, vehicle or equipment wash water, and chlorinated water.
13. Entrance(s) to the construction site shall be maintained in a condition that will prevent tracking or flowing of potential pollutants off site. Potential pollutants deposited on paved areas within the County right-of- way, such as roadways and sidewalks, shall be properly disposed of at the end of each working day or more frequently as necessary. The contractor shall be responsible for cleaning construction vehicles leaving the site on a daily basis to prevent dust, silt, and dirt from being released or tracked off site. All sediment deposited on paved roadways shall be removed at the end of each working day or more often, as necessary.
14. All disturbed areas shall be protected by using erosion prevention BMPs to the maximum extent practicable, such as establishing vegetation coverage, hydroseeding, straw mulch, geotextiles, plastic covers, blankets, or mats. Temporary Revegetation shall be installed as soon as practical after vegetation removal, but in all cases prior to October 1. Permanent revegetation or landscaping shall be installed prior to final inspection.
15. Whenever it is not possible to use erosion prevention BMPs on exposed slopes, sediment control BMPs such as fiber rolls and silt fences shall be installed to prevent sediment migration.

Fiber rolls and silt fences shall be trenched and keyed into the soil and installed on contour. Silt fences shall be installed approximately 2 to 5 feet from toe of slope.

16. Hydroseeding shall be conducted in a three-step process. First, evenly apply seed mix and fertilizer to the exposed slope. Second, evenly apply mulch over the seed and fertilizer. Third, stabilize the mulch in place. An equivalent single step process, with seed, fertilizer, water, and bonded fibers is acceptable.
17. Applications shall be broadcasted mechanically or manually at the rates specified below. Seed mix and fertilizer shall be worked into the soil by rolling or tamping. If straw is used as mulch, straw shall be derived from wheat, rice, or barley and be approximately six to eight inches in length. Stabilization of mulch shall be done hydraulically by applying an emulsion or mechanically by crimping or punching the mulch into the soil. Equivalent methods and materials may be used only if they adequately promote vegetation growth and protect exposed slopes.

    Materials and Application Rate (pounds per acre)

    a. Seed mix
        i. Bromus mollis (blando brome) - 40 pounds
        ii. Trifolium hirtum (hykon rose clover) - 20 pounds

    b. Fertilizer
        i. 16-20-0 & 15% sulphur - 500 pounds

    c. Mulch
        i. Straw - 4000 pounds

    d. Hydraulic stabilizing
        i. Non-asphaltic, derived from plants
        ii. M-binder or sentinel - 75-100 pounds

    e. Equivalent material
        i. Per manufacturer

18. Dust control shall be provided by contractor during all phases of construction.
19. Storm drain inlets shall be protected from potential pollutants until drainage conveyance systems are functional and construction is complete.
20. Energy dissipaters shall be installed at storm drain outlets which may convey erosive storm water flow.
21. Soil, material stockpiles, and fertilizing material shall be properly protected with plastic covers or equivalent BMPs to minimize sediment and pollutant transport from the construction site.
22. Solid waste, such as trash, discarded building materials and debris, shall be placed in designated collection areas or containers. The construction site shall be cleared of solid waste daily or as necessary. Regular removal and proper disposal shall be coordinated by the contractor.
23. A concrete washout area shall be designated to clean concrete trucks and tools. At no time shall concrete products and waste be allowed to enter County waterways such as creeks or storm drains. No washout of concrete, mortar mixers, or trucks shall be allowed on soil. Concrete waste shall be properly disposed.

24. Proper application, cleaning, and storage of potentially hazardous materials, such as paints and chemicals, shall be conducted to prevent the discharge of pollutants.
25. Temporary restrooms and sanitary facilities shall be located and maintained during construction activities to prevent the discharge of pollutants.
26. Appropriate vehicle storage, fueling, maintenance, and cleaning areas shall be designated and maintained to prevent discharge of pollutants.

4.7.3 Impact Analysis

a. Significance Thresholds and Methodology

The following thresholds are based on *CEQA Guidelines* Appendix G. For purposes of this EIR, impacts related to geology and soils are considered significant if implementation of the proposed project would:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault
    b. Strong seismic ground shaking
    c. Seismic-related ground failure, including liquefaction
    d. Landslides
2. Result in substantial soil erosion or the loss of topsoil
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse
4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirectly risks to life or property
5. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

To determine the uniqueness of a given paleontological resource, it must first be identified or recovered (i.e., salvaged). CEQA does not define “a unique paleontological resource or site.” However, SVP has defined a “significant paleontological resource” in the context of environmental review as follows:

> Fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are typically older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years) (SVP 2010).

For the purposes of this report, any activity that may destroy scientifically significant paleontological resources as defined above would be a significant impact.

b. Project Impacts and Mitigation Measures

Threshold:	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Impact GEO-1 NO REZONING SITES ARE LOCATED IN AN ALQUIST-PRIOLO EARTHQUAKE FAULT ZONE, AND THEREFORE DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT DIRECTLY OR INDIRECTLY CAUSE SUBSTANTIAL ADVERSE EFFECTS INVOLVING RUPTURE OF A KNOWN EARTHQUAKE FAULT. THERE WOULD BE NO IMPACT.

As discussed above in Section 4.7.1, *Setting*, Sonoma County applies the G District to sites located within an Alquist-Priolo Earthquake Fault Zone. None of the Rezoning Sites are within the G District. Therefore, development facilitated by the project would not directly or indirectly cause substantial adverse effects involving rupture of a known earthquake fault.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impact would occur.

Threshold:	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides; or, be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Impact GEO-2 DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN EXPOSURE OF PEOPLE OR STRUCTURES TO A RISK OF LOSS, INJURY, OR DEATH FROM SEISMIC EVENTS. DEVELOPMENT FACILITATED BY THE PROJECT COULD BE LOCATED ON A GEOLOGIC UNIT OR SOIL THAT IS UNSTABLE OR COULD BECOME UNSTABLE RESULTING IN ON OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION OR COLLAPSE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS.

Development facilitated by the project would result additional residents who would be potentially exposed to the effects of fault rupture, seismic ground shaking, liquefaction, and landslides from local and regional earthquakes. Structures that would be built on steep slopes could be exposed to an existing risk of landslide or, if improperly constructed, could exacerbate existing landslide conditions, especially on the Rezoning Sites listed in Table 4.7-1, which are located in areas vulnerable to liquefaction and/or landslide hazard. New structures could also experience substantial damage during seismic ground shaking events, including development on the Rezoning Sites listed in Section 4.7.1, *Liquefaction* subsection. Development on the Rezoning Sites in many cases would replace older buildings subject to seismic damage with newer structures built to current seismic standards that could better withstand the adverse effects of strong ground shaking. Potential

structural damage and the exposure of people to the risk of injury or death from structural failure would be minimized by compliance with CBC engineering design and construction measures. Foundations and other structural support features would be required to be designed to resist or absorb damaging forces from strong ground shaking and liquefaction.

In addition to compliance with mandatory CBC requirements, implementation of General Plan goals and policies would further reduce the potential for loss, injury, or death following a seismic event. General Plan goals and policies, including Policies PS-1a and 1b, would help to avoid development prone to seismic hazards. Implementation of these goals and policies, in addition to compliance with applicable laws and regulations, would minimize the potential for loss, injury, or death following a seismic event and would reduce this potential impact to a less-than-significant level.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project result in substantial soil erosion or the loss of topsoil?

Impact GEO-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCLUDE GROUND DISTURBANCE SUCH AS EXCAVATION AND GRADING THAT WOULD RESULT IN LOOSE OR EXPOSED SOIL. THIS DISTURBED SOIL COULD BE ERODED BY WIND OR DURING A STORM EVENT, WHICH WOULD RESULT IN THE LOSS OF TOPSOIL. ADHERENCE TO EXISTING PERMIT REQUIREMENTS AND COUNTY REGULATIONS WOULD ENSURE THIS IMPACT IS LESS THAN SIGNIFICANT.

Development facilitated by the project would involve construction activities such as stockpiling, grading, excavation, paving, and other earth-disturbing activities. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water.

Construction activities that disturb one or more acres of land surface are subject to NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) adopted by the SWRCB. Compliance with the permit requires each qualifying development project to file a Notice of Intent with the SWRCB. Permit conditions require preparation of a SWPPP, which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-storm water management controls. As described in Section 4.10, *Hydrology and Water Quality*, Rezoning Sites would be subject to the applicable NPDES Municipal Separate Storm Sewer System Permit (based on site location) and Sonoma County Code Chapters 11 and 11A, which require measures to reduce and eliminate stormwater pollutants, installation of appropriate BMPs to control stormwater runoff from construction sites, maintain or reduce stormwater runoff volumes and rates, and that grading and drainage permits be obtained prior to construction. The County also requires development to comply with the Low Impact Development Manual, which satisfies Order R1-2015-0030, NPDES Permit CA0025054 through the requirement of various low impact development measures. Inspection of construction sites before and after storms is also required to identify storm water discharge from the construction activity and to identify and implement erosion controls, where necessary. Enforcement of these permit requirements would reduce soil erosion impacts.

Additionally, Sonoma County's requirements for erosion prevention and sediment control would apply to development facilitated by the project. These include erosion prevention and sediment control in accordance with Chapter 11 and 11a of the Sonoma County Code, conformance of plans to erosion prevention and sediment control BMPs, requirements for effective erosion prevention and sediment control on all disturbed areas during the rainy season (October 1 to April 30), and prohibition of grading and drainage improvement construction during the rainy season except when on-site soil conditions permit work to be performed in compliance with the Sonoma County Code. Adherence to the requirements of the Sonoma County BMPs would reduce the potential for development facilitated by the project to cause erosion or the loss of topsoil by ensuring proper management of loose and disturbed soil.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact GEO-4 DEVELOPMENT FACILITATED BY THE PROJECT MAY RESULT IN THE CONSTRUCTION OF STRUCTURES ON EXPANSIVE SOILS, WHICH COULD CREATE A SUBSTANTIAL RISK TO LIFE OR PROPERTY. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH COMPLIANCE WITH THE REQUIREMENTS OF THE CBC.

Development facilitated by the project that is constructed on expansive soils could be subject to damage or could become unstable when the underlying soil shrinks or swells. The adverse effects of expansive soils can be avoided through proper subsoil preparation, drainage, and foundation design. In order to design an adequate foundation, it must be determined if the site contains expansive soils through appropriate soil sampling and laboratory soils testing. Expansive soils are identified through expansion tests of samples of soil or rock, or by means of the interpretation of Atterberg limit tests, a standard soils testing procedure. The CBC includes requirements to address soil-related hazards, including testing to identify expansive soils and design specifications where structure are to be constructed on expansive soils. Typical measures to treat expansive soil conditions involve removal, proper fill selection, and compaction. In cases where soil remediation is not feasible, the CBC requires structural reinforcement of foundations to resist the forces of expansive soils. Compliance with the requirements of the CBC, as well as relevant General Plan policies (including Policies PS-1a, 1b, and 1e), would reduce impacts related to expansive soils to a less-than-significant level.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Impact GEO-5 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT INCLUDE THE INSTALLATION OF SEPTIC TANKS OR ALTERNATIVE WASTEWATER DISPOSAL SYSTEMS ON SOILS INCAPABLE OF SUPPORTING SUCH SYSTEMS. NO IMPACTS WOULD OCCUR.

As described in Section 4.18, *Utilities and Service Systems*, development facilitated by the project would occur within designated Urban Service Areas, where existing wastewater infrastructure exists at most of the Rezoning Sites. Sites not located adjacent to wastewater infrastructure would require the construction of expanded wastewater facilities and infrastructure to serve future development (refer to Section 4.18, *Utilities and Service Systems*), as intended by the Urban Service Area designation. Therefore, the proposed project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, no impacts would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impact would occur.

Threshold:	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact GEO-6 DEVELOPMENT FACILITATED BY THE PROJECT MAY DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE DURING GROUND-DISTURBING ACTIVITIES. IMPACTS WOULD BE SIGNIFICANT AND MITIGATION WOULD BE REQUIRED.

Based on a paleontological literature review and existing fossil locality information available on the Paleobiology Database and University of California Museum of Paleontology database, the paleontological resource potential of the geologic units underlying the Rezoning Sites were determined in accordance with criteria set forth by the SVP (2010); refer to Table 4.7-2 for a description of the resource potential of geologic units within each Rezoning Site and Appendix GEO for additional information on paleontological resource potential.

Unique paleontological resources may be encountered during any ground-disturbing activities associated with development (e.g., grading, excavation, or other ground-disturbing construction activity) in areas assigned a high paleontological resource potential. Ground-disturbing activities may result in the destruction, damage, or loss of undiscovered scientifically significant paleontological resources. Identified units with a high paleontological resource potential (identified in Table 4.7-2) that experience ground disturbance at or near the surface could result in significant impacts to unique paleontological resources.

Unique paleontological resources may be encountered during ground-disturbing activities at shallow or unknown depths in areas mapped as having low paleontological resource potential at the surface. Early Holocene to late Pleistocene alluvial and marine terrace deposits (Qo, Qt) that may be present at shallow or unknown depths in areas mapped as middle to late Holocene deposits (Q, Qal) have a

high paleontological resource potential, and ground disturbance has potential to result in significant impacts to unique paleontological resources.

Mitigation Measures

Mitigation Measures GEO-1 through GEO-6, as applicable, shall be implemented for ground disturbing activities within the Rezoning Sites underlain by geologic units with high paleontological resource potential. Implementation of Mitigation Measures GEO-1 through GEO-6 would not be required for Rezoning Sites underlain by geologic units with low paleontological resource potential (i.e., Quaternary young alluvium [Q, Qal]) or no paleontological potential (i.e., Pliocene to Miocene Sonoma Volcanics [Psv, Tsb]).

GEO-1 PALEONTOLOGICAL REVIEW OF PROJECT PLANS

For projects with proposed ground-disturbing activity, the project applicant shall retain a Qualified Professional Paleontologist to review proposed ground disturbance associated with development to:

1. Assess if the project will require paleontological monitoring;
2. If monitoring is required, to develop a project-specific Paleontological Resource Mitigation and Monitoring Program (PRMMP) as outlined in Mitigation Measure GEO-2;
3. Draft the Paleontological Worker Environmental Awareness Program as outlined in Mitigation Measure GEO-3; and
4. Define within a project specific PRMMP under what specific ground disturbing activity paleontological monitoring will be required and the procedures for collection and curation of recovered fossils, as described in Mitigation Measures GEO-4, GEO-5, and GEO-6.

The Qualified Paleontologist shall base the assessment of monitoring requirements on the location and depth of ground disturbing activity in the context of the paleontological potential and potential impacts outlined in this section. A qualified professional paleontologist is defined by the SVP standards as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least two years (SVP 2010). The County shall review and approve the assessment before grading permits are issued.

GEO-2 PALEONTOLOGICAL RESOURCES MITIGATION AND MONITORING PROGRAM

For those projects deemed to require a PRMMP under Mitigation Measure GEO-1 above, the Qualified Paleontologist shall prepare a PRMMP for submission to the County prior to the issuance of grading permits. The PRMMP shall include a pre-construction paleontological site assessment and develop procedures and protocol for paleontological monitoring and recordation. Monitoring shall be conducted by a qualified paleontological monitor who meets the minimum qualifications per standards set forth by the SVP.

The PRMMP procedures and protocols for paleontological monitoring and recordation shall include:

1. Location and type of ground disturbance requiring paleontological monitoring.
2. Timing and duration of paleontological monitoring.
3. Procedures for work stoppage and fossil collection.

4. The type and extent of data that should be collected with recovered fossils.
5. Identify an appropriate curatorial institution.
6. Identify the minimum qualifications for qualified paleontologists and paleontological monitors.
7. Identify the conditions under which modifications to the monitoring schedule can be implemented.
8. Details to be included in the final monitoring report.

Prior to issuance of a grading permit, copies of the PRMMP shall be submitted to the County for review and approval as to adequacy.

GEO-3 PALEONTOLOGICAL WORKER ENVIRONMENTAL AWARENESS PROGRAM (WEAP)

Prior to any ground disturbance within Rezoning Sites underlain by geologic units with high paleontological resource potential, the applicant shall incorporate information on paleontological resources into the Project's Worker Environmental Awareness Training (WEAP) materials, or a stand-alone Paleontological Resources WEAP shall be submitted to the County for review and approval. The Qualified Paleontologist or his or her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff if fossils are discovered by construction staff. The Paleontological WEAP training shall be fulfilled simultaneously with the overall WEAP training, or at the first preconstruction meeting at which a Qualified Paleontologist attends prior to ground disturbance. Printed literature (handouts) shall accompany the initial training. Following the initial WEAP training, all new workers and contractors must be trained prior to conducting ground disturbance work. A sign-in sheet for workers who have completed the training shall be submitted to the County upon completion of WEAP administration.

GEO-4 PALEONTOLOGICAL MONITORING

Paleontological monitoring shall only be required for those ground-disturbing activities identified under Mitigation Measure GEO-1, where construction activities (i.e., grading, trenching, foundation work) are proposed in previously undisturbed (i.e., intact) sediments with high paleontological sensitivities. Monitoring shall be conducted by a qualified professional paleontologist (as defined above) or by a qualified paleontological monitor (as defined below) under the supervision of the qualified professional paleontologist. Monitoring may be discontinued on the recommendation of the qualified professional paleontologist if they determine that sediments are likely too young, or conditions are such that fossil preservation would have been unlikely, or that fossils present have little potential scientific value. The monitoring depth required for each of the Rezoning Sites is provided in Table 4.7-3, in addition to the associated geologic unit.

Table 4.7-3 Rezoning Sites Subject to Mitigation

Potential Rezone Site(s)	Sensitive Geologic Unit(s)	Recommended Monitoring
GEY-1 through GEY-3, GUE-2 through GUE-4, LAR-1 through LAR-8, SAN-1, SAN-3, SAN-5, SAN-10	Quaternary young alluvium (Q, Qal)	None
GEY-4	Quaternary young alluvium (Q, Qal) Early Cretaceous to Late Jurassic Great Valley Complex (KJgvc)	None
GUE-1	Quaternary old alluvial and marine terrace deposits (Qt)	All excavations within native (intact) sediments
FOR-1 through FOR-6, GRA-1, GRA-3 through GRA-5, PET-1 through PET-3	Wilson Grove Formation (Twg, Pwg)	All excavations within native (intact) sediments
GRA-2	Quaternary young alluvium (Qal)	None
SAN-2, SAN-4, SAN-6 through SAN-9, AGU-1 through AGU-3, SON-1 through SON-4	Quaternary old alluvium (Qo)	All excavations within native (intact) sediments
GLE-1, GLE-2	Huichica and Glen Ellen Formations (QT)	All excavations within native (intact) sediments
PEN-1 through PEN-9	Petaluma Formation (Pp)	All excavations within native (intact) sediments
PET-4	Wilson Grove Formation (Twg, Pwg) Pliocene to Miocene Sonoma Volcanics (Psv, Tsb) mapped within the southeast corner	All excavations within native (intact) sediments None

The following outlines minimum monitor qualifications and procedures for fossil discovery and treatment:

1. **Monitoring.** Paleontological monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources and meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor. The Qualified Paleontologist will determine the duration and timing of the monitoring based on the location and extent of proposed ground disturbance. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the surface or at depth, they may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Refer to Table 4.7-2 and Table 4.7-3 for a paleontological resource potential summary and recommendations for each of the 59 Rezoning Sites.
2. **Fossil Discoveries.** In the event of a fossil discovery by the paleontological monitor or construction personnel, all work in the immediate vicinity of the find shall cease. A Qualified Paleontologist shall evaluate the find before restarting construction activity in the area. If the Qualified Paleontologist determines that the fossil(s) is (are) scientifically significant; including identifiable specimens of vertebrate fossils, uncommon invertebrate, plant, and trace fossils; the Qualified Paleontologist (or paleontological monitor) shall recover them following standard field procedures for collecting paleontological as outlined in the PRMMP prepared for the project.
3. **Salvage of Fossils.** Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case

the Qualified Paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. If fossils are discovered, the Qualified Paleontologist (or Paleontological Monitor) shall recover them as specified in the project's PRMMP.

GEO-5 Preparation and Curation of Recovered Fossils

Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the University of California Museum of Paleontology), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Paleontologist.

GEO-6 Final Paleontological Mitigation Report

Upon completion of ground disturbing activity (and curation of fossils if necessary) the Qualified Paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated. The report shall be submitted to the County prior to occupancy permits. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.

Significance After Mitigation

With implementation of Mitigation Measures GEO-1 through GEO-6, impacts to paleontological resources from development facilitated by the project would be reduced or avoided and impacts would be less than significant. Mitigation Measures GEO-1 through GEO-6 do not apply to areas of Rezoning Site PET-4 which is underlain by geologic units with no paleontological potential. These measures also do not apply to any proposed ground-disturbing work within previously disturbed sediments.

4.8 Greenhouse Gas Emissions

This section analyzes the potential for the project to generate greenhouse gas (GHG) emissions in excess of standards or to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. The analysis in this section is based in part on modeling using the California Emissions Estimator Model (CalEEMod); modeling outputs are included in Appendix AQ.

4.8.1 Setting

a. Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but "climate change" is preferred to "global warming" because it helps convey other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate changes continuously, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed substantial acceleration in the rate of warming during the past 150 years (Intergovernmental Panel on Climate Change [IPCC] 2014). The understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (95 percent or greater chance) that the global average net effect of human activities has been the dominant cause of warming since the mid-twentieth century (IPCC 2014).

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons and perfluorocarbons, and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it only stays in the atmosphere for a short time and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

Both natural processes and human activities emit GHGs. CO_2 and CH_4 are emitted in the greatest quantities from human activities. CO_2 emissions are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Observations of CO_2 concentrations, globally averaged temperature, and sea level rise are generally well within the range of the extent of the earlier IPCC projections. Recently observed increases in CH_4 and N_2O concentrations are smaller than those assumed in the scenarios in the previous assessments. Each IPCC assessment used new projections of future climate change that have become more detailed as the models have become more advanced.

Manmade GHGs include fluorinated gases, such as SF_6 many of which have greater heat-absorption potential than CO_2. Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally 100 years). Because GHGs absorb different amounts of heat, a common

reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2e), and is the amount of a GHG emitted multiplied by its GWP. CO_2 has a 100-year GWP of one. By contrast, CH_4 has a GWP of 25, meaning its global warming effect is 25 times greater than CO_2 on a molecule per molecule basis (IPCC 2007).

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat trapping effect of GHGs, Earth's surface would be about 93 degrees Fahrenheit (°F) cooler (California Environmental Protection Agency 2006). However, emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations.

Greenhouse Gas Inventory

GLOBAL

Worldwide anthropogenic emissions of GHG were approximately 46,000 million metric tons (MMT or gigatonne) of CO_2e in 2010 (IPCC 2014). CO_2 emissions from fossil fuel combustion and industrial processes contributed about 65 percent of total emissions in 2010. Of anthropogenic GHGs, CO_2 was the most abundant accounting for 76 percent of total 2010 emissions. CH_4 emissions accounted for 16 percent of the 2010 total, while N_2O and fluorinated gases account for six and two percent, respectively (IPCC 2014).

FEDERAL

Total United States GHG emissions were 6,676.6 MMT of CO_2e in 2018 (United States Environmental Protection Agency [USEPA] 2018). Total U.S. emissions increased by 3.7 percent from 1990 to 2018. Overall, net emissions increased by 3.1 percent from 2017 to 2018 and decreased by 10.2 percent from 2005 to 2018. The decrease from 2005 to 2018 reflects long-term trends, including energy market trends, technological changes including energy efficiency, and energy fuel choices. Between 2017 and 2018, the increase in emissions was driven by an increase in CO_2 emissions from fossil fuel combustion, which was a result of increased energy use from greater heating and cooling needs due to a colder winter and hotter summer in 2018 compared to 2017. In 2018, the largest source of CO_2 and of overall emissions was fossil fuel combustion, representing approximately 81.3 percent of U.S. GHG emissions. CH_4 accounted for nearly 10 percent, N_2O accounted for approximately 6.5 percent, and the remaining 2.7 percent of U.S. GHG emissions were HFCs, PFCs, SF_6, and NF_3 (USEPA 2018).

CALIFORNIA

According to the California Air Resources Board (CARB), total California GHG emissions were 425 $MMTCO_2e$ in 2018 (CARB 2020a). The major source of GHGs in California is associated with transportation, contributing nearly 40 percent of statewide GHG emissions in 2018. The industrial sector is the second largest source, contributing 21 percent of statewide GHG emissions, and the electricity sector accounted for approximately 15 percent (CARB 2020a).

SONOMA COUNTY

The RCPA was formed in 2009 to coordinate countywide climate protection efforts among the County's nine cities and multiple agencies. The RCPA helps to set goals, pools resources, and formalizes partnerships in the County as it aims to create local solutions to complement State, federal, and private sector actions.

In 2016, the Regional Climate Protection Authority (RCPA) adopted Climate Action 2020 and Beyond (CA2020), a regional climate action plan with the goal of reducing emissions by 25 percent below 1990 levels by 2020 and 80 percent below 1990 levels by 2050. The RCPA established a baseline communitywide GHG inventory for calendar year 2010 and a backcast inventory for 1990 as part of the CA2020 development process. The RCPA completes periodic updates, including a 2018 inventory update, to help track progress towards achieving short and long-term emissions reduction goals established in CA2020. Unincorporated Sonoma County emissions in 2018 were 0.858 MMT CO_2e, slightly above 2015 emissions of 0.850 MMT CO_2e. Relative to 1990 emissions, 2018 emissions decreased by 20 percent, demonstrating the County's progress toward CA2020's emissions reduction goals. For Sonoma County as a whole, on-road transportation was the largest GHG emissions sector, followed by building energy use, and livestock and fertilizer. The EIR certified for CA2020 was litigated and the Superior Court found the EIR to be inadequate. Although Climate Action 2020 and Beyond is not qualified for CEQA purposes under CEQA Guidelines section 15183.5, it helps guide RCPA's efforts in countywide coordination of climate protection efforts.

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the twenty-first century than were observed during the twentieth century. Long-term trends have found that each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest. The observed global mean surface temperature for the decade from 2006 to 2015 was approximately 0.87 degrees Celsius (°C; 0.75°C to 0.99°C) higher than the global mean surface temperature over the period from 1850 to 1900. Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature obtained from station observations agree that Land-Surface Air Temperature as well as sea surface temperatures have increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades (IPCC 2014, 2018).

According to *California's Fourth Climate Change Assessment*, statewide temperatures from 1986 to 2016 were approximately 1°F to 2°F higher than those recorded from 1901 to 1960. Potential impacts of climate change in California may include loss in water supply from snowpack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years. While there is scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. In addition to statewide projections, *California's Fourth Climate Change Assessment* includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the state as well as regionally-specific climate change case studies, including for the greater San Francisco Bay Area region that includes Sonoma County, where the project is located (State of California 2018). Below is a summary of some of the potential effects that could be experienced in California and the San Francisco Bay Area region because of climate change.

AIR QUALITY

Higher temperatures are conducive to air pollution formation and could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the

magnitude of the effect, and therefore its indirect effects, are uncertain. As temperatures have increased in recent years, the area burned by wildfires has increased, and wildfires have been occurring at higher elevations in the Sierra Nevada Mountains (State of California 2019). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality would worsen. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thereby ameliorating the pollution associated with wildfires. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks (California Natural Resources Agency 2009).

In the San Francisco Bay Area region, changes in meteorological conditions under climate change will affect future air quality. Hotter future temperatures will act to increase surface ozone concentrations (State of California 2018). Increased wildfires from higher temperatures and more extreme droughts will lead to further air quality degradation during such fires.

WATER SUPPLY

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of natural and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. For example, many southern California cities have experienced their lowest recorded annual precipitation twice within the past decade; however, in a span of only two years, Los Angeles experienced both its driest and wettest years on record (California Department of Water Resources 2008). This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. However, the average early spring snowpack in the western United States, including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 5.9 inches along the central and southern California coast (State of California 2019). The Sierra snowpack provides most of California's water supply by accumulating snow during wet winters and releasing it slowly during dry springs and summers. A warmer climate is predicted to reduce the fraction of precipitation falling as snow and result in less snowfall at lower elevations, thereby reducing the total snowpack (California Department of Water Resources 2008; State of California 2019). The State of California projects that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from the historical average by 2050 (State of California 2019).

Like the rest of the state, the San Francisco Bay Area is expected to face a challenging combination of decreased water supply and increased water demand (State of California 2018). Melting snowpack, increasing seawater intrusion into groundwater, increasing rates of evapotranspiration, and levee failures or subsidence that contaminate Delta supplies will affect both the quantity of water available and the quality of supplies. Future increases in temperature, regardless of whether total precipitation goes up or down, will likely cause longer and deeper droughts, posing major problems for water supplies, natural ecosystems, and agriculture.

HYDROLOGY AND SEA LEVEL RISE

As discussed above, climate change could potentially affect the amount of snowfall, rainfall, and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Climate change has the potential to induce substantial sea level rise in the coming century (State of California 2019). The rising sea level increases the likelihood and risk of flooding. The rate of increase of global mean sea levels over the 2001-2010 decade, as observed by satellites, ocean buoys and land gauges, was approximately 3.2 millimeters per year, which is double the observed twentieth century trend of 1.6 millimeters per year (World Meteorological Organization [WMO] 2013). As a result, global mean sea levels averaged over the last decade were about 8 inches higher than those of 1880 (WMO 2013). Sea levels are rising faster now than in the previous two millennia, and this rise is expected to accelerate, even with robust GHG emission control measures. The most recent IPCC report predicts a mean sea level rise of 10 to 37 inches by 2100 (IPCC 2018). A rise in sea levels could erode 31 to 67 percent of southern California beaches, flooding approximately 370 miles of coastal highways during 100-year storm events, jeopardizing California's water supply due to salt water intrusion, and inducing groundwater flooding and/or exposure of buried infrastructure (State of California 2019). Increased CO_2 emissions can cause oceans to acidify due to the carbonic acid it forms. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

In the San Francisco Bay Area, much of the transportation system — airports, roads, and railways — is concentrated along the bay where flooding from sea level rise and storm surge is a major vulnerability (State of California 2019). The effects of climate change will further exacerbate impacts from sea level rise and storm surge in the region.

AGRICULTURE

California has a $49 billion annual agricultural industry that produces over a third of the country's vegetables and two-thirds of the country's fruits and nuts (California Department of Food and Agriculture 2022). Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent; water demand could increase as hotter conditions lead to the loss of soil moisture; crop-yield could be threatened by water-induced stress and extreme heat waves; and plants may be susceptible to new and changing pest and disease outbreaks (State of California 2019). Temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, thereby affecting their quality (California Climate Change Center 2006).

In the San Francisco Bay Area region, where 70 percent of California's grapes are grown, more frequent droughts and extreme temperatures could affect wine production. (State of California 2018). This and other climate effects can contribute to higher food prices and shortages.

ECOSYSTEMS AND WILDLIFE

Climate change and potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists project that the annual average maximum daily temperatures in California could rise by 4.4 to 5.8°F in the next 50 years and by 5.6 to 8.8°F in the next century (State of California 2019). Soil moisture is likely to decline in many regions, and intense rainstorms are likely

to become more frequent. Rising temperatures could have four major impacts on plants and animals related to (1) timing of ecological events; (2) geographic distribution and range; (3) species' composition and the incidence of nonnative species within communities; and (4) ecosystem processes, such as carbon cycling and storage (Parmesan 2006; State of California 2019).

Many of the impacts identified above would impact ecosystems and wildlife in the San Francisco Bay Area region. Increases in wildfire would further remove sensitive habitat; increased severity in droughts would potentially starve plants and animals of water; and sea level rise will affect sensitive coastal ecosystems, especially wetlands.

4.8.2 Regulatory Setting

a. Federal

Federal Clean Air Act

The United States Environmental Protection Agency (USEPA) issued an Endangerment Finding under Section 202(a) of the Clean Air Act, opening the door to federal regulation of GHGs. The Endangerment Finding notes that GHGs threaten public health and welfare and are subject to regulation under the Clean Air Act. To date, the USEPA has not promulgated regulations on GHG emissions, but it has already begun to develop them.

Federal GHG Emissions Regulation

The U.S. Supreme Court in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 497) held that the USEPA has the authority to regulate motor-vehicle GHG emissions under the federal Clean Air Act. The USEPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions. In 2012, the USEPA issued a Final Rule that establishes the GHG permitting thresholds that determine when Clean Air Act permits under the New Source Review Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities.

In 2014, the U.S. Supreme Court in Utility Air Regulatory Group v. EPA (134 S. Ct. 2427 [2014]) held that USEPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V permit. The Court also held that PSD permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of best available control technology.

Safer Affordable Fuel-Efficient Vehicle Rule

On September 27, 2019, the USEPA and the National Highway Safety Administration published the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program." The Part One Rule revokes California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. To account for the effects of the Part One Rule, CARB released off-model adjustment factors on November 20, 2019, to adjust criteria air pollutant emissions outputs from the EMFAC model. The Final SAFE Rule (i.e., Part Two) then relaxed federal GHG emissions and Corporate Average Fuel Economy standards to increase in stringency at only about 1.5 percent per year from model year 2020 levels over model years 2021-2026 (CARB 2020b). The previously established emission standards and related fuel economy standards would have achieved about

four percent per year improvements through model year 2025. Therefore, CARB has prepared off-model CO_2 emissions adjustment factors for both the EMFAC2014 and EMFAC2017 models to account for the impact of the SAFE Vehicles Rule (CARB 2020c). With the incorporation of these adjustment factors, operational emission factors for CO_2 generated by light-duty automobiles, light-duty trucks, and medium-duty trucks associated with project-related vehicle trips may increase by approximately one percent (in 2020) up to as much as 17 percent (in 2050) compared to non-adjusted estimates. These increases would not alter the significance of the operational GHG emissions from development facilitated by the project as discussed further below.

Construction Equipment Fuel Efficiency Standard

The USEPA sets emission standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 horsepower (hp) and were phased in by 2000. A new standard was adopted in 1998 that introduced Tier 1 for all equipment below 50 hp and established the Tier 2 and Tier 3 standards. The Tier 2 and Tier 3 standards were phased in by 2008 for all equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004], and most recently updated in 2014 [79 Federal Register 46356]).

b. State

California's Advanced Clean Cars Program (Assembly Bill 1493)

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as Pavley), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, USEPA granted the waiver of Clean Air Act preemption to California for its GHG emission standards for motor vehicles beginning with the 2009 model year. Pavley I regulates model years from 2009 to 2016 and Pavley II, which is now referred to as "Low Emission Vehicle III GHG", regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the Low Emission Vehicle, Zero Emissions Vehicles, and Clean Fuels Outlet programs, and would provide major reductions in GHG emissions. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011). The implementation of these rules is currently delayed due to the SAFE Vehicle Rule, described under *Federal Regulations*.

California Global Warming Solutions Act of 2006 (Assembly Bill 32)

California's major initiative for reducing GHG emissions is outlined in AB 32, the "California Global Warming Solutions Act of 2006," which was signed into law in 2006. AB 32 codified the statewide goal of reducing GHG emissions to 1990 levels by 2020 and required CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 limit of 427 MMT CO_2e. The Scoping Plan was approved by CARB on December 11, 2008 and included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since approval of the Scoping Plan. These goals may be appropriate for plan level analyses (city,

county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the State (CARB 2017).

Global Warming Solutions Act and Scoping Plan Extension (Senate Bill 32)

Senate Bill (SB) 32, signed into law on September 8, 2016, tightens the requirements of AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies, such as SB 350 and SB 1383. The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies.

Global Warming Solutions Act and The California Climate Crisis Act (Assembly Bill 1279)

AB 1279, "The California Climate Crisis Act," was passed on September 16, 2022 and declares the State would achieve net zero greenhouse gas emissions as soon as possible, but no later than 2045, and to achieve and maintain net negative greenhouse gas emissions thereafter. In addition, the bill states that the State would reduce GHG emissions by 85 percent below 1990 levels no later than 2045. The 2022 Scoping Plan lays out a path to achieve AB 1279 targets (CARB 2022). The actions and outcomes in the 2022 Scoping Plan would achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

100 Percent Clean Energy Act/Renewables Portfolio Standard Program (Senate Bill 100)

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

PRC Sections 21083.05 and 21097 (Senate Bill 97)

SB 97, signed in August 2007, added Section 21083.05 to and repealed Section 21097 from the Public Resources Code (PRC). This bill acknowledges that climate change is an environmental issue that requires analysis in CEQA documents. In March 2010, the California Natural Resources Agency adopted amendments to the CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHG and climate change impacts.

Sustainable Communities and Climate Protection Act (Senate Bill 375)

SB 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 directs each of the State's 18 major Metropolitan Planning Organizations to

prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets, for inclusion in the Regional Transportation Plan. On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. ABAG was assigned targets of a 10 percent reduction in GHGs from transportation sources by 2020 and a 19 percent reduction in GHGs from transportation sources by 2035. In the ABAG region, SB 375 also provides the option for the coordinated development of subregional plans by subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

PRC Division 30 Part 3 Chapter 13.1 and Health and Safety Code Sections 39730.5-8 (Senate Bill 1383)

Adopted in September 2016, SB 1383 requires the CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. The bill requires the strategy to achieve the following reduction targets by 2030:

1. Methane – 40 percent below 2013 levels
2. Hydrofluorocarbons – 40 percent below 2013 levels
3. Anthropogenic black carbon – 50 percent below 2013 levels

The bill also requires the California Department of Resources Recycling and Recovery (CalRecycle), in consultation with CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

Executive Order B-55-18

On September 10, 2018, Governor Brown issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets legislatively established by SB 375, SB 32, SB 1383, and SB 100.

California Integrated Waste Management Act (Assembly Bill 341)

The California Integrated Waste Management Act of 1989, as modified by AB 341, requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities; diversion of 50 percent of all solid waste on and after January 1, 2000; and diversion of 75 percent of all solid waste by 2020, and annually thereafter. CalRecycle is required to develop strategies to implement AB 341, including source reduction.

California Building Standards Code

The California Code of Regulations, Title 24, is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility, and so on. The California Building Standards Code's energy efficiency and green building standards are outlined below.

PART 6 – BUILDING ENERGY EFFICIENCY STANDARDS

The California Code of Regulations, Title 24, Part 6 is the Building Energy Efficiency Standards. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-

residential buildings to reduce California's energy demand. The Building Energy Efficiency Standards are updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. New construction and major renovations must demonstrate their compliance with the current Building Energy Efficiency Standards through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC).

The 2019 standards move toward cutting energy use in new homes by more than 50 percent and will require installation of solar photovoltaic (PV) systems for single-family homes and multifamily buildings of three stories and less. The 2019 standards focus on four key areas: (1) smart residential PV systems; (2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); (3) residential and nonresidential ventilation requirements; (4) and nonresidential lighting requirements (CEC 2018a). Under the 2019 standards, nonresidential buildings will be 30 percent more energy efficient compared to the 2016 standards, and single-family homes will be 7 percent more energy efficient (CEC 2018b). When accounting for the electricity generated by the solar PV system, single-family homes would use 53 percent less energy compared to homes built to the 2016 standards (CEC 2018b).

PART 11 – CALIFORNIA GREEN BUILDING STANDARDS

The California Green Building Standards Code, referred to as CALGreen, was added as Part 11 of Title 24 in 2009 as a voluntary code, and then became mandatory effective January 1, 2011 (as part of the 2010 California Building Code). The 2016 CALGreen institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory Green Building Standards and may adopt additional amendments for stricter requirements.

The mandatory standards require the following practices:

1. 20 percent reduction in indoor water use relative to specified baseline levels
2. 50 percent construction/demolition waste diverted from landfills
3. Inspections of energy systems to ensure optimal working efficiency
4. Use of low pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards
5. Implementation of dedicated circuitry to facilitate installation of electric vehicle (EV) charging stations in newly constructed attached garages for single-family and duplex dwellings
6. Installation of EV charging stations at least three percent of the parking spaces for all new multi-family developments with 17 or more units

The voluntary standards require the following:

1. Tier I—15 percent improvement in energy requirements, stricter water conservation requirements for specific fixtures, 65 percent reduction in construction waste, 10 percent recycled content, 20 percent permeable paving, 20 percent cement reduction, cool/solar reflective roof
2. Tier II—30 percent improvement in energy requirements, stricter water conservation requirements for specific fixtures, 75 percent reduction in construction waste, 15 percent

recycled content, 30 percent permeable paving, and 30 percent cement reduction, cool/solar reflective roof

Similar to the compliance reporting procedure for demonstrating Building Energy Efficiency Standards compliance in new buildings and major renovations, compliance with the CALGreen water-reduction requirements must be demonstrated through completion of water use reporting forms for new low-rise residential and non-residential buildings. Buildings must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water use rate.

c. Local

Bay Area Air Quality Management District

In 2013, the Bay Area Air Quality Management District (BAAQMD) adopted a resolution that builds on state and regional climate protection efforts by:

1. Setting a goal for the Bay Area region to reduce GHG emissions by 2050 to 80 percent below 1990 levels
2. Developing a Regional Climate Protection Strategy to make progress towards the 2050 goal, using BAAQMD's Clean Air Plan to initiate the process
3. Developing a 10-point work program to guide the BAAQMD's climate protection activities in the near-term

The BAAQMD is currently developing the Regional Climate Protection Strategy to set 2050 targets and has outlined the 10-point work program, which includes policy approaches, assistance to local governments, and technical programs that will help the region make progress toward the 2050 GHG emissions goal.

The BAAQMD is responsible for enforcing standards and regulating stationary sources in its jurisdiction, the San Francisco Bay Area Air Basin, which includes the southern portion of Sonoma County (from approximately Windsor to the southern County border). Larkfield, Graton, Santa Rosa, Glen Ellen, Agua Caliente, Penngrove, Petaluma, and Sonoma sites fall within this jurisdiction, as described in Section 4.3, *Air Quality*. The BAAQMD regulates GHG emissions through specific rules and regulations, as well as project and plan level emissions thresholds for GHGs to ensure that new land use development in the San Francisco Bay Area Air Basin contributes to its fair share of emissions reductions (BAAQMD 2017).

Northern Sonoma County Air Pollution Control District

The Northern Sonoma County Air Pollution Control District (NSCAPCD) participates in an advisory role to help planners and local government with complex air quality issues, including GHGs (NSCAPCD 2020). The NSCPACD commonly assists planners with zoning and land use; to assist in the establishment of GHG thresholds; to prevent and address air quality nuisances, and to identify potential pollution impacts to sensitive communities. The NSAPCD also crafts incentive programs with GHG reduction co-benefits under its Vehicle Pollution Mitigation Program, state Carl Moyer Program, and other non-permit funded programs. For example, NSCAPCD's 3-2-1 Go Green! EV incentive program reduces GHGs by removing combustion vehicles from the roads and supports development of an EV charging infrastructure. NSCAPCD's 3-2-1 Burn Clean! wood stove program destroys old dirty stoves, reduces black soot, a climate change pollutant, and provides an option to

electrify heating. The Carl Moyer program provides options to remove dirty diesel engines from operation with cleaner engines or conversion to electric operation.

Sonoma County Climate Change Action Resolution

The Sonoma County Board of Supervisors adopted the Climate Change Action Resolution, in coordination with RCPA (County of Sonoma 2018). The resolution affirmed the County's commitment to work toward RCPA's countywide target in Climate Action 2020 and Beyond, to reduce GHG emissions by 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050 (pursuant to AB 32), and is intended to help create countywide consistency and clear guidance about coordinated implementation of the GHG reduction measures.

The resolution includes 20 goals to reduce GHG emissions, including the following:

1. Increase building energy efficiency
2. Increase renewable energy use
3. Switch equipment from fossil fuel to electricity
4. Reduce travel demand through focused growth
5. Encourage a shift toward low carbon transportation options
6. Increase vehicle and equipment fuel efficiency
7. Encourage a shift toward low carbon fuels in vehicles and equipment
8. Reduce idling
9. Increase solid waste diversion
10. Increase capture and use of methane from landfills
11. Reduce water consumption
12. Increase recycled water and greywater use
13. Increase water and wastewater infrastructure efficiency
14. Increase use of renewable energy in water and wastewater systems
15. Reduce emissions from livestock operations
16. Reduce emissions from fertilizer use
17. Protect and enhance the value of open and working lands
18. Promote sustainable agriculture
19. Increase carbon sequestration
20. Reduce emissions from the consumption of goods and services

The resolution also has the objective of increasing resilience to climate change by pursuing local actions that support the following nine goals:

1. Promote healthy, safe communities
2. Protect water resources
3. Promote as sustainable, climate resilient economy
4. Mainstream the use of climate projections
5. Manage natural buffer zones around community resources
6. Promote agricultural preparedness and food security
7. Protect infrastructure

8. Increase emergency preparedness and prevention
9. Monitor climate change and its effects

Sonoma County Five-Year Strategic Plan

The Board approved Sonoma County's Five-Year Strategic Plan in March 2021 to provide the context to inform policies and projects that are prioritized for the next five years. The plan will guide how the County align short and long-term objectives with operations and budgets to reflect a clear sense of purpose and demonstrate meaningful progress. The first chapter of the County's Five-Year Strategic Plan is dedicated to climate action and resiliency, and sets five primary goals with the intent of the County reaching carbon neutrality by 2030. The Plan sets several goals that would have the effect of reducing GHG emissions, including:

Climate Action and Resiliency Goal 2: Invest in the community to enhance resiliency and become carbon neutral by 2030.

Objective 1: Support carbon eliminating microgrid technology in communities and energy grid resilience to reduce impact of power loss during power shutdowns and natural disasters (floods, fires, earthquakes) through education and legislative advocacy, prioritizing critical infrastructure and vulnerable populations.

Objective 2: Provide $20 million in financing by 2026 that incentivizes property managers and renters to retrofit existing multi-family housing towards achieving carbon neutral buildings.

Objective 3: Partner with educational institutions, trade associations, businesses and non-profit organizations to establish workforce development programs that focus on carbon neutral and resilient building technologies by 2023.

Climate Action and Resiliency Goal 3: Make all County facilities carbon free, zero waste and resilient.

Objective 1: Design or retrofit County facilities to be carbon neutral, zero waste and incorporate resilient construction techniques and materials.

Objective 2: Design or retrofit County facilities that promote and maximize telework to decrease greenhouse gas emissions generated by employee commutes.

Objective 3: Invest in County owned facilities, establishing carbon eliminating microgrid technology and improving energy grid resilience to reduce the impact of power loss during power shutdowns and natural disasters (floods, fires, earthquakes), prioritizing critical infrastructure such as command and communications facilities.

Climate Action and Resiliency Goal 4: Maximize sustainability and emissions reductions in all County Fleet vehicles.

Objective 1: Where feasible, phase out County (owned or leased) gasoline powered light-duty cars, vans, and pickups to achieve a 30% zero-emission vehicle light-duty fleet by 2026.

Objective 2: Invest in the County's employee Clean Commute program to promote use of alternate modes of transportation, including bike and carpool incentives, and last mile solutions connecting bus and train stations to County worksites.

Objective 3: Upgrade the existing County owned Electric Vehicle charging station infrastructure by 2023.

Sonoma County Climate Resilient Lands Strategy

Sonoma County's Climate Action and Resiliency Division and Agricultural Preservation and Open Space District have collaborated to create the Sonoma County Climate Resilient Lands Strategy, a document designed to provide structure and guidance to climate-related efforts throughout the county, with a focus on natural and working lands. The Strategy was approved by the Board of Supervisors on September 13, 2022. The Strategy intends to implement the Climate Action and Resiliency pillar of the Sonoma County Five-Year Strategic Plan by developing policies to maximize carbon sequestration and minimize loss of natural carbon sinks, encouraging agricultural and open space land management to maximize sequestration, and developing a framework and policies to incentivize collaboration with private and public landowners.

Sonoma County General Plan 2020

Section 8 of the Open Space and Resource Conservation Element and Circulation and Transit Element of the Sonoma County General Plan 2020 contains energy goals that would have the effect of reducing GHG emissions, including:

Goal CT-1: Provide a well-integrated and sustainable circulation and transit system that supports a city and community centered growth philosophy through a collaborative effort of all the Cities and the County.

Objective CT-1.5: Reduce greenhouse gas emissions by minimizing future increase in VMT, with an emphasis on shifting short trips by automobile to walking and bicycling trips.

Objective CT-1.6: Require that circulation and transit system improvements be done in a manner that, to the extent practical, is consistent with community and rural character, minimizes disturbance of the natural environment, minimizes air and noise pollution, and helps reduce greenhouse gas emissions.

Goal OSRC-14: Promote energy conservation and contribute to energy demand reduction in the County.

Objective OSRC-14.1: Increase energy conservation and improve energy efficiency in County government operations.

Objective OSRC-14.2: Encourage County residents and businesses to increase energy conservation and improve energy efficiency.

Objective OSRC-14.3: Reduce the generation of solid waste and increase solid waste reuse and recycling.

Objective OSRC-14.4: Reduce greenhouse gas emissions by 25 percent below 1990 levels by 2015.

Policy OSRC-14c: Continue to purchase and utilize hybrid, electric, or other alternative fuel vehicles for the County vehicle fleet; and encourage County residents and businesses to do the same.

Policy OSRC-14d: Support project applicants in incorporating cost effective energy efficiency that may exceed State standards.

Policy OSRC-14e: Develop energy conservation and efficiency design standards for new development.

Policy OSRC-14f: Use the latest green building certification standards, such as the Leadership in Energy and Environmental Design (LEED) standards, for new development.

Policy OSRC-14i**:** Manage timberlands for their value both in timber production and offsetting greenhouse gas emissions.

4.8.3 Impact Analysis

a. Thresholds of Significance

To determine whether a project would result in a significant impact to GHG emissions, CEQA Guidelines Appendix G requires consideration of whether a project would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs

Neither the County nor NSCAPCD have adopted a numeric threshold of significance for determining impacts related to GHG emissions. The analysis contained herein relies on the BAAQMD Significance Thresholds and guidance provided in the 2022 BAAQMD *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, as described in greater detail below.

BAAQMD Significance Thresholds

Individual projects do not generate sufficient GHG emissions to influence climate change directly. Climate change is, by definition, a cumulative impact. Thus, GHG emissions impacts are evaluated as cumulative impacts. Physical changes caused by a project can contribute incrementally to significant cumulative effects, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a plan or project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines Section 15064[h][1]). On the plan level, the 2022 BAAQMD *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans* provides two approaches for determining significance of GHGs. The two approaches are as follows:

1. Evaluation of whether a plan or project meets State goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045; or
2. Evaluation of consistency with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

If a plan is not consistent with one of these approaches, it would be considered to have an cumulatively considerable incremental contribution to a significant cumulative impact on the environment related to GHG emissions.

According to CEQA Guidelines Section 15183.5 and the 2022 BAAQMD *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, a qualified GHG reduction strategy must:

1. Quantify GHG emissions, both existing and projected over a specified period, resulting from activities in a defined geographic area

2. Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable
3. Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated in the geographic area
4. Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level
5. Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels
6. Be adopted in a public process following environmental review

Sonoma County does not currently have an adopted plan that meets the requirements of a qualified GHG reduction strategy. Accordingly, the analysis contained herein relies on an evaluation of whether the Housing Element Update meets State goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045.

b. Methodology

The focus of this analysis is limited to the potential GHG emissions that would result from net buildout of the Housing Element Update. Other emissions generated in the County, such as those generated by businesses or individual operations, may contribute to GHG emissions globally. However, as a reasonable approach to analyzing the GHG impacts of the proposed project, only the emissions that may change when compared to existing conditions under implementation of the project are included in this EIR. Emissions not directly resulting from development facilitated by the project are considered outside the scope of this CEQA analysis because it would be speculative to analyze impacts not directly related to the project.

Based on plan-level guidance from the 2022 BAAQMD *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, GHG emissions associated with implementation of the project are discussed qualitatively by comparing the project to the 2022 BAAQMD GHG thresholds, namely whether the policies included therein would work towards the State goals of reducing GHG emissions by 40 percent below 1990 levels by 2030 and carbon neutrality by 2045.

c. Project Impacts and Mitigation Measures

Threshold:	Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
Threshold:	Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT MEET STATE GHG GOALS FOR 2030 OR 2045. MITIGATION MEASURE GHG-1 WOULD ENSURE INDIVIDUAL RESIDENTIAL PROJECTS IMPLEMENTED AS A RESULT OF THE PROPOSED PROJECT WOULD COMPLY WITH BAAQMD GHG THRESHOLDS FOR LAND USE PROJECTS. HOWEVER, THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Construction

Development facilitated by the project would result in GHG emissions during construction. GHG emissions generated during future construction activities would primarily result from fuel consumption associated with heavy equipment, light-duty vehicles, machinery, and generators. Temporary grid power may be provided to construction trailers or electric-powered construction equipment, which could also result in indirect GHG emissions from energy generation. Development facilitated by the project would utilize construction contractors who comply with applicable CARB regulations such as accelerated retrofitting and replacement of heavy-duty diesel on- and off-road equipment. Construction contractors would also be required to comply with the provisions of CCR Title 13, Sections 2449 and 2485, which prohibits diesel-fueled commercial and heavy duty off-road vehicles from idling for more than five minutes, thereby minimizing unnecessary GHG emissions. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would minimize inefficient fuel consumption and thus reduce GHG emissions. These construction equipment standards (i.e., Tier 4 efficiency requirements) are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068. Pursuant to applicable CALGreen requirements, future development facilitated by the project would comply with construction waste management practices to divert construction and demolition debris from landfills. These practices would result in efficient use of energy and would therefore minimize unnecessary GHG emissions. Furthermore, in the interest of cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary, which would also have the effect of minimizing GHG emissions.

Pursuant to the 2022 BAAQMD *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, BAAQMD does not recommend a construction-related climate impact threshold. According to BAAQMD, GHG emissions from construction represent a very small portion of a project's lifetime GHG emissions. The proposed thresholds for land use projects are designed to address operational GHG emissions that represent most project GHG emissions. Therefore, the evaluation of GHG emissions impacts associated with implementation of the project is focused on operational emissions, discussed below.

Operation

GHG emissions generated during project operation would result primarily from energy usage in buildings and fuel consumption associated with light-duty vehicles. The Housing Element Update contains policies that would reduce operational GHG emissions, providing progress towards the State's goal of 40 percent below 1990 levels by 2030 and carbon neutrality by 2045. Proposed Housing Element Update policies related to GHG emission reductions include:

1. **Policy HE-3e:** Continue to encourage affordable infill projects on underutilized sites within Urban Service Areas by allowing flexibility in development standards pursuant to state density bonus law.
2. **Policy HE-3g:** Strive to focus affordable housing development in moderate- and high- resource areas well-served by public transportation, schools, retail, and other services. Continue to consider developer requests to add the Affordable Housing (AH) and Workforce Housing (WH) combining districts to sites in light industrial and commercial zones and other appropriate urban zones when designation criteria are met.
3. **Policy HE-5d**: Strive to provide for senior housing needs. Focus senior housing projects in areas well-served by transit, accessible sidewalks, and amenities. Consider adoption of a Senior Housing (SH) Combining district with additional incentives. Promote Universal Design principles in new residential construction.
4. **Policy HE-6a:** Promote conservation of energy, water, and other natural resources as a cost-saving measure in existing residential development.
5. **Policy HE-6b:** Promote energy and water conservation and energy efficiency in new residential and mixed-use construction projects.
6. **Policy HE-6c:** Promote solid waste reduction, reuse, and recycling opportunities in residential and mixed-use construction.
7. **Policy HE-6f:** Provide high quality and equitable public services, including public transportation, crime prevention, police protection, street lighting, street cleaning, and recreational facilities and programs, in lower-resource areas through the use of place-based strategies and master plans.

Sonoma County does not have a qualified GHG reduction plan and, thus, is not eligible for a consistency comparison between such a local climate action plan and the proposed Housing Element Update. However, a consistency comparison between a State GHG reduction plan (i.e., the State Climate Change Scoping Plan) and the proposed Housing Element is provided below.

The proposed Housing Element policies would assist in reducing emissions. Specifically, Policy HE-3e would reduce GHG emissions through the encouragement of infill development, ultimately reducing VMT. Policies HE-3g and HE-5d would focus development in areas well-served by existing transit, which would also reduce GHG emissions by reducing VMT. Similarly, Policy HE-6f focuses on the provision of high-quality public transportation. Policies HE-6a and HE-6b would promote the conservation of energy and energy efficiency in both new and existing development, which would reduce GHG emissions by reducing overall energy usage. Finally, Policy HE-6c would promote solid waste reduction, which would also reduce GHG emissions by reducing the overall energy requirements associated with solid waste processing.

The Housing Element Update is a policy-level document that would guide housing development throughout unincorporated Sonoma County. The CARB 2017 Climate Change Scoping Plan outlines a pathway to achieving the 2030 reduction targets set under California Senate Bill 32, which are considered interim targets toward meeting the long-term 2045 carbon neutrality goal established by California Executive Order B-55-18. The 2022 Climate Change Scoping Plan outlines how to achieve net zero GHG emissions as soon as possible, but no later than 2045, and to achieve and maintain net negative GHG emissions thereafter. As described above, the Housing Element Update contains proposed policies that would facilitate a reduction in GHG emissions, but the Housing Element Update does not specifically outline how the County would meet the goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045. As such, the Housing Element

Update would not be consistent with SB 32 and the California Executive Order B-55-18 goal of carbon neutrality by 2045. Furthermore, Sonoma County does not have a qualified GHG reduction plan to guide progress towards State goals. Therefore, project impacts related to the generation of GHG emissions and consistency with State GHG reduction plans would be potentially significant. Mitigation measures would be required.

Mitigation Measures

GHG-1: COMPLY WITH BAAQMD PROJECT-LEVEL LAND USE THRESHOLDS

Individual residential projects facilitated by the Housing Element Update project shall comply with the following BAAQMD thresholds for land use projects as defined in the BAAQMD *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, published April 2022, or its later adopted successor. Projects on the Rezoning Sites shall include, at a minimum, the following design elements:

1. Buildings
    a. The project shall not include natural gas appliances or natural gas plumbing.
2. Transportation
    a. The project shall achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

As noted in the BAAQMD *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, a project designed and built to incorporate these design elements would contribute its fair share to achieve California's long-term climate goals, and an agency reviewing the project under CEQA can conclude that the project would not make a cumulatively considerable contribution to global climate change.

If the County adopts a GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b), projects may comply with that GHG reduction strategy in lieu of implementing the BAAQMD project-level land use thresholds stated above.

Significance After Mitigation

Implementation of Mitigation Measure GHG-1 would ensure that any residential development facilitated by the proposed project would comply with current BAAQMD GHG thresholds for individual land use projects to the extent feasible. In addition, Mitigation Measure TRA-1 (see Section 4.16, *Transportation*) would require a Transportation Demand Management (TDM) program to reduce vehicle trips, and therefore GHG emissions associated with vehicle trips, consistent with the BAAQMD GHG thresholds. However, due to the nature of residential development, there is no feasible mitigation available to reduce GHG emissions from fuel consumption associated with light-duty vehicles to a less than significant level, and therefore some projects may not comply with the thresholds. Therefore, impacts would remain significant and unavoidable even with implementation of the mitigation measure.

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4.9 Hazards and Hazardous Materials

This section evaluates the potential impacts relating to hazards and hazardous materials impacts associated with implementation of the proposed project.

4.9.1 Setting

Definition of Hazardous Materials

The California Health and Safety Code defines a hazardous material, in part, as a material that "because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment."

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

Land Use Patterns

Small quantities of hazardous materials are routinely used, stored, and transported throughout the County by commercial and retail businesses and in educational facilities, hospitals, and households. Hazardous materials users and waste generators in the County include businesses, public and private institutions, and households. Federal, State, and local agency databases maintain comprehensive information on the locations of facilities using large quantities of hazardous materials, and facilities generating hazardous waste. Some of these use certain classes of hazardous materials that require accidental release scenario modeling and risk management plans to protect the people and the environment in surrounding land uses.

Past and present land use patterns are good predictors of the potential for past contamination by hazardous materials and the current use and storage of hazardous materials. Industrial sites and certain commercial land uses, such as dry cleaners, are more likely to use and store large quantities of hazardous materials than residential land uses. Land use patterns are also useful for identifying the location of sensitive receptors, such as schools, day-care facilities, hospitals, and nursing homes. In the County, industrial and commercial land uses are concentrated along major transportation corridors, such as Highway 101 and in downtown areas.

Some of the Rezoning Sites are located within 0.25 mile of a school, as shown in Table 4.9-1.

Table 4.9-1 Rezoning Sites Near Schools

Rezoning Site	Nearby School	Approximate Distance (miles)
LAR-1	San Miguel Elementary School	0.2
LAR-8	San Miguel Elementary School	0.2
LAR-3	San Miguel Elementary School	0.2
GUE-4	Guerneville School	0.1
GRA-1	Oak Grove Elementary School	0.1
AGU-1	El Verano Elementary School	0.1
AGU-2	El Verano Elementary School	0.1
PET-1	Petaluma Junior High School	0.1
PET-2	Petaluma Junior High School	0.2
PET-3	Petaluma Junior High School	0.2
PET-4	Petaluma Junior High School	0.21
FOR-1	Forestville School-Academy	0.1
FOR-3	Forestville School-Academy	0.2
FOR-4	Forestville School-Academy	0.1
FOR-5	Forestville School-Academy	0.1
FOR-6	Forestville School-Academy	0.2

Existing Hazardous Material Contamination

Several existing contaminants, including asbestos, lead (in sources such as lead-based paint [LBP] in buildings or in soil), and contaminated soil and groundwater, may be present throughout the County. Due to the age of some existing buildings on the sites (refer to Table 4.5-1 in Section 4.5, *Cultural Resources*), asbestos may be present in those structures and could be mobilized during demolition activities. Similarly, lead may be present in paint that was sold prior to 1978 or in soil that was contaminated by leaded gasoline or improperly discarded batteries. Existing soil contamination may also be present at Rezoning Sites due to contamination from household hazardous wastes. The U.S. Environmental Protection Agency (USEPA) describes household hazardous waste as leftover household products that can catch fire, react, explode under certain circumstances, or that are corrosive or toxic. Household hazardous wastes may include products such as paints, cleaners, oils, batteries, and pesticides (USEPA 2022).

The State Water Resources Control Board GeoTracker website identifies Leaking Underground Storage Tank (LUST) cleanup sites, Cleanup Program Sites (formerly known as Spills, Leaks, Investigations, and Cleanups sites), military sites, land disposal sites (landfills), permitted underground storage tank sites, Waste Discharge Requirement sites, Irrigated Lands Regulatory Program sites, and Department of Toxic Substances Control cleanup and hazardous waste permit sites. A search of the GeoTracker database for open sites within 0.25 mile of the Rezoning Sites was performed on July 29, 2022 (State Water Resources Control Board 2022). In addition, the Department of Toxic Substances Control's (DTSC) EnviroStor database was searched on July 29, 2022 for active cleanup sites within the same distance of the sites (DTSC 2022). According to the database search, seven open or active hazardous waste sites are located within 0.25 mile of the Rezoning Sites, of which two sites (FOR-1 and SAN-9) are co-located with sites analyzed in this Program EIR, as shown in Table 4.9-2.

Table 4.9-2 Open Hazardous Materials Sites in the Project Area

Listing Name	Address	Site ID	Site Type	Status	Rezoning Sites within 0.25 mile
Fast & Easy Mart	5321 Old Redwood Highway	T0609700430	LUST Cleanup Site	Site Assessment (4/2/1999); Verification Monitoring (3/10/2020)	LAR-3, LAR-4, LAR-5, LAR-7
Electro Vector	6555 Covey Road (FOR-1)	SL0609742964	Cleanup Program Site	Assessment & Interim Remedial Action (6/13/2017)	FOR-1, FOR-5
Forestville Chevron	6490 Front Street	T0609700043	LUST Cleanup Site	Remediation (8/27/2019)	FOR-1, FOR-5, FOR-6
Daniel Auto Repair	20501 Broadway	T0609700816	LUST Cleanup Site	Remediation (6/25/2019)	SON-1, SON-2, SON-3, SON-4
Bakers Service Station – 0273	9155 Graton Road	T0609700019	LUST Cleanup Site	Verification Monitoring (12/16/2015)	GRA-1, GRA-2, GRA-1, GRA-4
Turner's Automotive	9001 Graton Road	T0609700435	LUST Cleanup Site	Remediation (12/14/2005)	GRA-1, GRA-2, GRA-1, GRA-4
Bepex Corporation	150 Todd Road (SAN-9)	T0609792508	Cleanup Program Site	Verification Monitoring (2/7/2020)	SAN-9

Source: GeoTracker and EnviroStor databases, searched July 29, 2022

Airports and Aircraft Hazards

Airports in Sonoma County include the Charles M. Schulz Sonoma County Airport, the Cloverdale Municipal Airport, the Healdsburg Municipal Airport, the Petaluma Municipal Airport, the Sonoma Skypark Airport, and the Sonoma Valley Airport. None of the Rezoning Sites are within an airport influence area, defined as an area in which current or future airport-related noise, over flight, safety, or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses.

Emergency Response Plans

California Government Code Section 8568, the California Emergency Services Act, states that "the State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof." The Act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a county manager or county administrator. The provisions of the Act are reflected and expanded on by appropriate local emergency ordinances. The Act further describes the function and operations of government at all levels during extraordinary emergencies, including war.

All local emergency plans are extensions of the State of California Emergency Plan. The State Emergency Plan conforms to the requirements of California's Standardized Emergency Management System (SEMS), which is the system required by Government Code 8607(a) for managing emergencies involving multiple jurisdictions and agencies (Governor's Office of Emergency Services [CalOES] 2017). The SEMS incorporates the functions and principles of the Incident Command System, the Master Mutual Aid Agreement, existing mutual aid systems, the operational area

concept, and multi-agency or inter-agency coordination (CalOES 2022). Local governments must use SEMS to be eligible for funding of their response-related personnel costs under state disaster assistance programs. The SEMS consists of five organizational levels that are activated as necessary, including: field response, local government, operational area, regional, and State. CalOES divides the State into six mutual aid regions. Sonoma County is in Mutual Aid Region II, which includes Del Norte, Humboldt, Mendocino, Lake, Napa, Alameda, Solano, Contra Costa, San Francisco, San Mateo, Alameda, Santa Clara, Santa Cruz, San Benito, and Monterey counties (CalOES 2018).

The Sonoma County Operational Area Hazard Mitigation Plan focuses on mitigating hazards to reduce the impacts of disasters by identifying effective and feasible actions to reduce the risks of potential hazards.

Wildland Fire Hazards

Wildland Fire Hazards are discussed in Section 4.19, *Wildfire*.

Agricultural Chemicals

As the community continues to support agricultural production, risks associated with agricultural chemicals such as pesticides, herbicides, and organic /inorganic fertilizers may occur. Residential uses in the proximity of agricultural uses that use pesticides and herbicides increase the chance of health risks. Agricultural operations are located throughout portions of the County as discussed in Section 4.2, *Agriculture and Forestry Resources*. Pesticide application permits are renewed on an annual basis by the County Agricultural Commissioner. Regulated commercial applications of pesticides are documented monthly and compiled an annual report submitted to the County. The Sonoma County Agricultural Commissioner's Office receives approximately 40 pesticide complaints annually countywide. About half are from nearby residents affected by agricultural spraying and the other half from those driving by on roadways adjacent to spraying activities (Town of Windsor 2015).

4.9.2 Regulatory Setting

The management of hazardous materials and hazardous wastes is regulated at federal, state, and local levels, including through programs administered by the USEPA; agencies within the California Environmental Protection Agency, such as the DTSC; federal and State occupational safety agencies; and the Sonoma County Certified Unified Program Agency Hazardous Materials Unit, as discussed further below.

a. Federal Regulations

Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA)

These acts established a program administered by the USEPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

Comprehensive Environmental Response, Compensation and Liability Act, amended by the Superfund Amendments and Reauthorization Act (1986)

This law was enacted in 1980 and provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Among other things, Comprehensive Environmental Response, Compensation and Liability Act established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. Comprehensive Environmental Response, Compensation and Liability Act also enabled revision of the National Contingency Plan, which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List.

Federal Insecticide, Fungicide, and Rodenticide Act

This Act (7 U.S. Code [USC] 136 et seq.) provides Federal control of pesticide distribution, sale, and use. The USEPA was given authority under the Act to study the consequences of pesticide usage, and to require users (farmers, utility companies, and others) to register when purchasing pesticides. Later amendments to the law required users to take exams for certification as applicators of pesticides. All pesticides used in the United States must be registered (licensed) by the USEPA. Registration assures that pesticides will be properly labeled and that, if used in accordance with specifications, they will not cause unreasonable harm to the environment.

Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations

Governed by the U.S. Housing and Urban Development, regulations for LBP are contained in the Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations (CFR) 33, which requires sellers and lessors to disclose known LBP and LBP hazards to perspective purchasers and lessees. Additionally, all LBP abatement activities must follow California and federal occupational safety and health administrations (California Occupational Safety and Health Administration [Cal/OSHA] and federal Occupational Safety and Health Administration [OSHA], respectively and with the State of California Department of Health Services requirements. Only LBP trained and certified abatement personnel can perform abatement activities. All lead LBP removed from structures must be hauled and disposed of by a transportation company licensed to transport this type of material at a landfill or receiving facility licensed to accept the waste.

U.S. Environmental Protection Agency

The USEPA is the agency primarily responsible for enforcement and implementation of Federal laws and regulations pertaining to hazardous materials. Applicable Federal regulations pertaining to hazardous materials are contained in the CFR Titles 29, 40, and 49. Hazardous materials, as defined in the CFR, are listed in 49 CFR 172.101. The management of hazardous materials is governed by the following laws:

1. RCRA of 1976 (42 USC 6901 et seq.);
2. Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (also called the Superfund Act) (42 USC 9601 et seq.)
3. Federal Insecticide, Fungicide, and Rodenticide Act (7 USC 136 et. Seq.)
4. Superfund Amendments and Reauthorization Act of 1986 (Public Law 99 499)

These laws and associated regulations include specific requirements for facilities that generate, use, store, treat, and/or dispose of hazardous materials. USEPA provides oversight and supervision for Federal Superfund investigation/remediation projects, evaluates remediation technologies, and develops hazardous materials disposal restrictions and treatment standards.

b. State Regulations

Department of Toxic Substances Control

As a department of the California Environmental Protection Agency, DTSC is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of RCRA and the California Health and Safety Code.

DTSC also administers the California Hazardous Waste Control Law (HWCL) to regulate hazardous wastes. While the HWCL is generally more stringent than RCRA, until the USEPA approves the California program, both state and federal laws apply in California. The HWCL lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Government Code Section 65962.5 requires the DTSC, the State Department of Health Services, the State Water Resources Control Board, and CalRecycle to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the state. Collectively, these lists are known as the "Cortese List." The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included.

If any soil is excavated from a site containing hazardous materials, it would be considered a hazardous waste if it exceeded specific criteria in Title 22 of the California Code of Regulations. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

Hazardous Waste Control Act

The hazardous waste management program enforced by DTSC was created by the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in California Code of Regulations (CCR) Title 26. The State program is similar to, but more stringent than, the Federal program under RCRA. The regulations list materials that may be hazardous, and establish criteria for their identification, packaging, and disposal. Environmental health standards for management of hazardous waste are contained in CCR Title 22, Division 4.5. As required by California Government Code Section 65962.5, DTSC maintains a Hazardous Waste and Substances Site List that is part of the State's Cortese List.

California Department of Pesticide Regulation, Department of Food and Agriculture, and the Department of Public Health

The California Department of Pesticide Regulations (DPR), a division of CalEPA, in coordination with the Measurement Standards division of the California Department of Food and Agriculture, and the California Department of Public Health have the primary responsibility to regulate pesticide use, vector control, food, and drinking water safety. CCR Title 3 requires the coordinated response between the County Agricultural Commissioner and the Sonoma County Department of Health Services to address the use of pesticides used in vector control for animal and human health on a local level. DPR registers pesticides; the County tracks pesticide use. Title 22 is used by the California Department of Public Health also to regulate both small and large public water systems.

California Fire and Building Codes

The 2019 Fire and Building Codes establishes the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare for the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of this code apply to the construction, alteration, movement enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout the State of California.

c. Local

County of Sonoma Agricultural Commissioner

The regulation of pesticide storage, application, and waste disposal is under the jurisdiction of the County Agricultural Commissioner who implements the DPR program. Since 1990, the Commissioner's office has compiled reports required of farmers and other users of agricultural pesticides which provide complete, site specific documentation of every pesticide application. These requirements include pesticides used on parks, golf courses, cemeteries, rangeland and pastures, and along roadside and railroad rights-of-way. The reports are transferred to the DPR and entered into a statewide database.

Sonoma County Multi-Jurisdictional Hazard Mitigation Plan

The Sonoma County Multi-Jurisdictional Hazard Mitigation Plan, adopted October 2021, assesses the County's vulnerabilities to various hazards and presents mitigation strategy, including goals, objectives, and actions that the County will strive to implement over the next five years. These mitigation actions are intended to reduce the disruption or loss of life, property, and economy that might result from a natural disaster. The hazard and risk assessment focuses on earthquake, flood, wildland fire, and landslide hazards, as these are considered to constitute the greatest risk to the County based on past disaster events, future probabilities, and degree of vulnerability. The plan also includes climate change related implications on hazard trends, including sea level rise and drought (County of Sonoma 2021a).

Sonoma County Environmental Health and Safety Department

The Environmental Health and Safety Division of the Sonoma County Department of Health Services protects health, prevents disease, and promotes health for all persons in Sonoma County. The

department has programs that employ strategies to prevent health hazards. These include a LUST oversight program that oversees the investigation and cleanup of fuel releases from underground storage tanks in most areas of the County. Other programs include healthy home programs, septic disposal inspections, and a solid waste program.

Sonoma County Operational Area Emergency Operations Plan and Evacuation Plan Annex

The Sonoma County Operational Area (OA) Emergency Operations Plan (EOP), published in March 2022, is a guidebook for the OA to use during phases of an all-hazards emergency management process, which includes preparedness, response, recovery, and mitigation (Sonoma County 2022). The OA for Sonoma County includes cities, special districts, tribal nations, and unincorporated areas of the County. The EOP is intended to facilitate coordination between agencies and jurisdictions within Sonoma County while ensuring the protection of life, property, and the environment during disasters. It provides the framework for a coordinated effort between partners and provides stability and coordination during a disaster. The EOP outlines the specific actions that the OA will carry out when an emergency exceeds or has the potential to exceed the capacity of a single agency or jurisdiction to respond. It sets forth the organizational framework and addresses steps needed to safeguard the whole community - especially those who are most at-risk, experience the most vulnerabilities, and/or have been historically underserved.

The August 2021 Evacuation supporting annex to the EOP, prepared by the County Department of Emergency Management, outlines the strategies, procedures, and organizational structures to be used in managing coordinated, large-scale evacuations in the OA (Sonoma County 2021b). It provides direction for stakeholder organizations including County departments, cities, special districts, community groups, and others, ensuring multi-disciplinary and multi-jurisdictional agency. It focuses specifically on evacuation within the Sonoma County OA in response to extraordinary situations associated with natural and human-caused disasters and technological incidents, including both peacetime and national security operations. It was developed to coordinate large-scale evacuations, where two or more communities are conducting evacuations and countywide coordination of resources and emergency operations is necessary.

Sonoma County General Plan

The Sonoma County General Plan includes policies that aim to reduce potential damage from hazardous materials, including the following:

Goal PS-4: Prevent unnecessary exposure of people and property to risks of damage or injury from hazardous materials.

Objective PS-4.2: Regulate the handling, storage, use, and disposal of hazardous materials in order to reduce the risks of damage and injury from hazardous materials

Policy PS-4a**:** While maintaining the autonomy granted to it pursuant to State zoning laws, implement Federal, State, and County requirements for the storage, handling, disposal, and use of hazardous materials, including requirements for management plans, security precautions, and contingency plans.

Policy PS-4d**:** Work with applicable regulatory agencies to regulate the transportation of hazardous materials consistent with adopted County policies.

4.9.3 Impact Analysis

a. Significance Thresholds and Methodology

The following thresholds are based on *CEQA Guidelines* Appendix G. For purposes of this Program EIR, impacts related to hazards and hazardous materials are considered significant if implementation of the proposed project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires

b. Project Impacts and Mitigation Measures

Threshold:	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, or would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Impact HAZ-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS, OR THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Project implementation would result in more intense use of land with higher density housing in several locations throughout the County. However, residential land uses typically do not use or handle large quantities of hazardous materials.

Some older structures that may be demolished during construction of the project may contain hazardous materials such as lead-based paint, asbestos-containing materials (ACM), universal waste, and polycholorinated byphenals (PCB). Exposure to lead can cause adverse health effects,

including disturbance of the gastrointestinal system, anemia, kidney disease, and neuromuscular and neurological dysfunction (in severe cases). Lead-based paint and other lead-containing materials associated with development facilitated by the project would be handled in compliance with Cal/OSHA regulations regarding lead-based paints and materials. The CCR Title 14, Section 1532.1, requires testing, monitoring, containment, and disposal of lead-based paints and materials, such that exposure levels do not exceed Cal/OSHA standards. Compliance with applicable standards would ensure impacts related to hazardous materials are less than significant.

Friable ACMs are regulated as a hazardous air pollutant under the Clean Air Act. As a worker safety hazard, they are also regulated under the authority of Cal/OSHA and by the Bay Area Air Quality Management District. In structures that would be demolished, any ACMs would be abated in accordance with State and Federal regulations prior to the start of demolition or renovation activities and in compliance with all applicable existing rules and regulations, including the Bay Area Air Quality Management District. These programs would ensure that asbestos removal would not result in the release of hazardous materials to the environment that could impair human health. Therefore, the impact related to ACMs would be less than significant.

Fluorescent lighting ballasts manufactured prior to 1978, and electrical transformers, capacitors, and generators manufactured prior to 1977, may contain PCBs. In accordance with the Toxic Substances Control Act and other federal and State regulations, individual projects would be required to properly handle and dispose of electrical equipment and lighting ballasts that contain PCBs during demolition of older buildings, ensuring that the impact related to PCBs would be less than significant.

Buildout of the proposed project would include the use of construction machinery that would involve the transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. Additionally, hazardous materials would be needed for fueling and servicing construction equipment. These types of hazardous materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by County, State, and Federal regulations and compliance with applicable standards discussed in Section 4.9.2 would ensure impacts from construction-related hazardous materials are less than significant.

The County of Sonoma Department of Emergency Management personnel respond to hazardous materials incidents. Major hazardous materials accidents associated with residential uses are fairly infrequent, and additional emergency response capabilities are not anticipated to be necessary to respond to the potential incremental increase in the number of incidents that could result from implementation of the proposed project.

As discussed in Section 4.2, *Agriculture and Forestry Resources*, rezoning allowed by the project would result in new development near agricultural production. The regulation of pesticide storage, application, and waste disposal is under the jurisdiction of the County Agricultural Commissioner. The Sonoma County Agricultural Commissioner regulates agriculture and pesticide use in the County and pesticide application permits must be renewed yearly. In addition, regulated commercial applications of pesticides are documented monthly and compiled in an annual report submitted to the County. Agriculture production within the County must comply with all DPR pesticide regulations including pesticide registration and work requirements.

The proposed project would facilitate residential development at a higher density in the vicinity of some schools, as described in Table 4.9-1. However, as discussed above, residential uses typically do not emit hazardous materials or substances. While these sites may have pre-existing contamination, they would be remediated through coordination with the appropriate regulatory agency.

Compliance with existing applicable regulations and policies would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials. Oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these substances. Therefore, impacts from a hazard to the public or the environment through routine transport, use or disposal of hazardous materials and reasonably foreseeable upset and/or accident conditions would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact HAZ-2 DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN DEVELOPMENT ON SITES CONTAMINATED WITH HAZARDOUS MATERIALS. HOWEVER, COMPLIANCE WITH APPLICABLE REGULATIONS RELATING TO SITE REMEDIATION WOULD MINIMIZE IMPACTS FROM DEVELOPMENT ON CONTAMINATED SITES, RESULTING IN A LESS THAN SIGNIFICANT IMPACT.

Existing sites that may potentially contain hazardous land uses in the County include large and small-quantity generators of hazardous waste, such as gas stations, dry cleaners, and industrial uses. As noted in Table 4.9-2, there are seven active or open sites containing or potentially containing hazardous materials contamination within 0.25 mile of Rezoning Sites. Development facilitated by the proposed project on or near these hazardous material sites (including SAN-9 and FOR-1, which are associated with active GeoTracker cases) could expose construction workforce and future occupants to hazardous materials. Sites with hazardous materials near the Rezoning Sites are listed in Table 4.9-2.

Development typically within 0.25 mile of sites identified in Table 4.9-2 would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board, the Sonoma County Local Oversight Program, or DTSC, before construction activities could begin. The agency responsible for oversight would determine the types of remediation and cleanup required, and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells onsite with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants.

It is also possible that underground storage tanks (UST) in use prior to permitting and record keeping requirements may be present in the County. If an unidentified UST were uncovered or disturbed during construction activities, it would be removed under permit from the County; if such removal would potentially undermine the structural stability of existing structures, foundations, or impact existing utilities, the tank might be closed in place without removal. Tank removal activities could pose both health and safety risks, such as the exposure of workers, tank handling personnel, and the public to tank contents or vapors. Potential risks, if any, posed by USTs would be minimized by managing the tank according to existing standards contained in Division 20, Chapters 6.7 and

6.75 (UST Program) of the California Health and Safety Code as enforced and monitored by the Environmental Programs Division.

The extent to which groundwater may be affected by an UST or other potential contamination source, if at all, depends on the type of contaminant, the amount released, the duration of the release, distance from source, and depth to groundwater. If groundwater contamination is identified, characterization of the vertical and lateral extent of the contamination and remediation activities would be required by the Regional Water Quality Control Board prior to the commencement of any new construction activities that would disturb the subsurface. If contamination exceeds regulatory action levels, the developer would be required to undertake remediation procedures prior to grading and development under the supervision of the Regional Water Quality Control Board, depending upon the nature of any identified contamination. Compliance with existing State and local regulations would reduce impacts to less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact HAZ-3 THE REZONING SITES ARE NOT LOCATED WITHIN TWO MILES OF AN AIRPORT. DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN A SAFETY HAZARD OR EXCESSIVE NOISE FOR PEOPLE RESIDING OR WORKING IN OR NEAR THE REZONING SITES. THERE WOULD BE NO IMPACT.

No Rezoning Sites are in the general vicinity of an airport, and none of the noise contours overlap with those sites. Therefore, no substantial noise exposure from airport noise would occur to construction workers or residents of the project, and similarly, there would be no safety concerns associated with the need to limit development in runway protection zones. Therefore, future development encouraged by the project would not result in a safety hazard or excessive noise for people in the County, and no impact would occur.

Mitigation Measures

No mitigation would be required.

Significance After Mitigation

No impacts would occur and mitigation is not required.

Threshold:	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact HAZ-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN ANY PHYSICAL CHANGES THAT COULD INTERFERE WITH OR IMPAIR EMERGENCY RESPONSE OR EVACUATION. THEREFORE, THE PROJECT WOULD NOT RESULT IN INTERFERENCE WITH THESE TYPES OF ADOPTED PLANS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

There are no proposed physical changes such as roadway construction that would interfere or impair emergency response or evacuation. The project would not result in changes to emergency evacuation routes, nor would it substantially increase traffic or roadway congestion such that use of an evacuation route would be hindered. The project would also not conflict with the County's adopted EOP or Evacuation supporting annex.

Development facilitated by the project would accommodate future population growth and would increase vehicle miles travelled in the County. This could lead to increased congestion during emergency evacuations. However, the County reviews and approves projects to ensure that emergency access meets County standards. Future projects facilitated by the project, as well as all development in the County, must comply with road standards and are reviewed by the Permit Sonoma Fire Prevention Division to ensure development would not interfere with evacuation routes and would not impede the effectiveness of evacuation plans. Therefore, the project would not impair implementation of or physically interfere with evacuation or emergency response plans. The impact related to emergency response and evacuation plans would be less than significant.

Mitigation Measures

No mitigation measures would be required

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact HAZ-5 DEVELOPMENT FACILITATED BY THE PROJECT COULD EXPOSE PEOPLE OR STRUCTURES TO RISK OF LOSS, INJURY, OR DEATH INVOLVING WILDLAND FIRES. EVEN WITH IMPLEMENTATION OF MITIGATION MEASURES, IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Refer to Section 4.19, *Wildfire* for analysis of impacts related to wildfire. In particular, Impact WFR-2 concludes that the Rezoning Sites are in or near moderate, high and very high fire hazard severity zones, and that mitigation measures would be required. Impacts would be significant.

Mitigation Measures

Mitigation Measures WFR-1 through WFR-3 would be required (refer to Section 4.19, *Wildfire*).

Significance After Mitigation

With implementation of Mitigation Measures WFR-1, WFR-2 and WFR-3, the risk of loss, injury, or death would be reduced. These measures would make structures more fire resistant and less vulnerable to loss in the event of a wildfire. These measures would also reduce the potential for

construction to inadvertently ignite a wildfire. However, it is not possible to prevent a significant risk of wildfires or fully protect people and structures from the risks of wildfires, despite implementation of mitigation. This impact would remain significant and unavoidable.

4.10 Hydrology and Water Quality

This section presents the existing conditions, summarizes the regulatory and planning framework, and analyzes the impacts to the surface water and groundwater resources in Sonoma County, relative to the proposed project. Impacts to water supply and wastewater treatment are discussed in Section 4.18, *Utilities and Service Systems*. Extensive overlap exists in regulatory programs governing environmental aspects of water quality, drinking water quality, and the public health aspects of water supply protection. There is also overlap in the characterization of groundwater aquifers as potential water supply sources for rural communities in the County.

4.10.1 Environmental Setting

There are seven distinct watersheds throughout Sonoma County. The Russian River watershed is the largest in terms of area, runoff volume, number of cities it passes through, and population adjacent to it. Due to the large size of the Russian River watershed and the complexity of the coastal watersheds, it and several of the coastal watersheds are divided into subbasin units whose size and boundaries are determined by several common traits, including runoff patterns, geology, topography, vegetation, and land use. The watersheds and subbasins for each grouping of Rezoning Sites are listed in Table 4.10-1.

Table 4.10-1 Watersheds and Sub-Watersheds in Sonoma County

Rezoning Sites	Watershed	Sub-watershed
Geyserville (all sites)	Middle Russian River	Sausal Creek-Russian River
Guerneville (all sites)	Lower Russian River	Dutch Bill Creek-Russian River
Larkfield (LAR-1, LAR-2, LAR-6, LAR-8)	Mark West Creek	Porter Creek-Mark West Creek
Larkfield (LAR-3, LAR-4, LAR-5, LAR-7)	Mark West Creek	Windsor Creek
Forestville (all sites)	Lower Russian River	Green Valley Creek
Forestville (northern half of FOR-2 only)	Lower Russian River	Porter Creek-Russian River
Graton (all sites)	Lower Russian River	Green Valley Creek
Graton (southern portion of GRA-3 and southeastern portion of GRA-5)	Mark West Creek	Lower Laguna De Santa Rosa
Santa Rosa (all sites)	Mark West Creek	Upper Laguna De Santa Rosa
Glen Ellen (all sites)	Sonoma Creek-Frontal San Pablo Bay Estuaries	Upper Sonoma Creek
Agua Caliente (all sites)	Sonoma Creek-Frontal San Pablo Bay Estuaries	Lower Sonoma Creek
Penngrove (all sites)	Petaluma River-Frontal San Pablo Bay Estuaries	Petaluma River
Petaluma (all sites)	Petaluma River-Frontal San Pablo Bay Estuaries	Petaluma River
Sonoma (all sites)	Carneros Creek-Frontal San Pablo Bay Estuaries	Schell Creek-Frontal San Pablo Bay Estuaries

Source: United States Environmental Protection Agency (USEPA) 2022

The climate in Sonoma County is Mediterranean with warm dry summers and cool, damp winters. Temperatures along the coast are generally cool throughout summer and seldom drop below freezing in winter. Inland temperature can vary greatly, with occasional highs exceeding 100 degrees Fahrenheit and lows sometimes falling below freezing (U.S. Climate Data 2022).

There are three major creeks and rivers in Sonoma County: the Russian River, Sonoma Creek, and Petaluma River. The Russian River is approximately 110 miles in length, originates in the Coast Ranges, and discharges into the Pacific Ocean. Sonoma Creek is 22 miles in length, originates at Bald Mountain and discharges into San Pablo Bay. Petaluma Creek is 18 miles in length, originates in Penngrove, and discharges into the San Pablo Bay, Napa Sonoma Marsh, and Petaluma Point. Figure 4.10-1 and Figure 4.10-2 show the creeks and drainages within the County near the Rezoning Sites.

The California Department of Water Resources (DWR) identifies the groundwater basins and sub-basins in Sonoma County. Most of these groundwater basins are centered along major creek and river valleys in the central and southern portions of the County. The groundwater basins underlying the Rezoning Sites are shown on Figure 4.10-3. The groundwater basins for each grouping of Rezoning Sites are listed in Table 4.10-2.

Table 4.10-2 Groundwater Basins in Sonoma County

Rezoning Sites	Groundwater Basin
Geyserville	Alexander Valley – Alexander Area
Guerneville	Lower Russian River Valley
Larkfield	Santa Rosa Valley – Santa Rosa Plain
Forestville	Wilson Grove Formation Highlands
Graton	Wilson Grove Formation Highlands
Santa Rosa	Santa Rosa Valley – Santa Rosa Plain
Glen Ellen	Napa-Sonoma Valley – Sonoma Valley
Agua Caliente	Napa-Sonoma Valley – Sonoma Valley
Penngrove	Petaluma Valley
Petaluma	Wilson Grove Formation Highlands
Sonoma	Napa-Sonoma Valley – Sonoma Valley

Source: DWR 2020

a. Water Quality

Water quality is a concern due to its potential impact on human health, enterprise, aquatic organisms, and ecosystem conditions. Quality is determined by factors such as native condition of surface water and groundwater and sources of contamination (natural and human induced).

Figure 4.10-1 Creeks and Drainages in Sonoma County – Northern

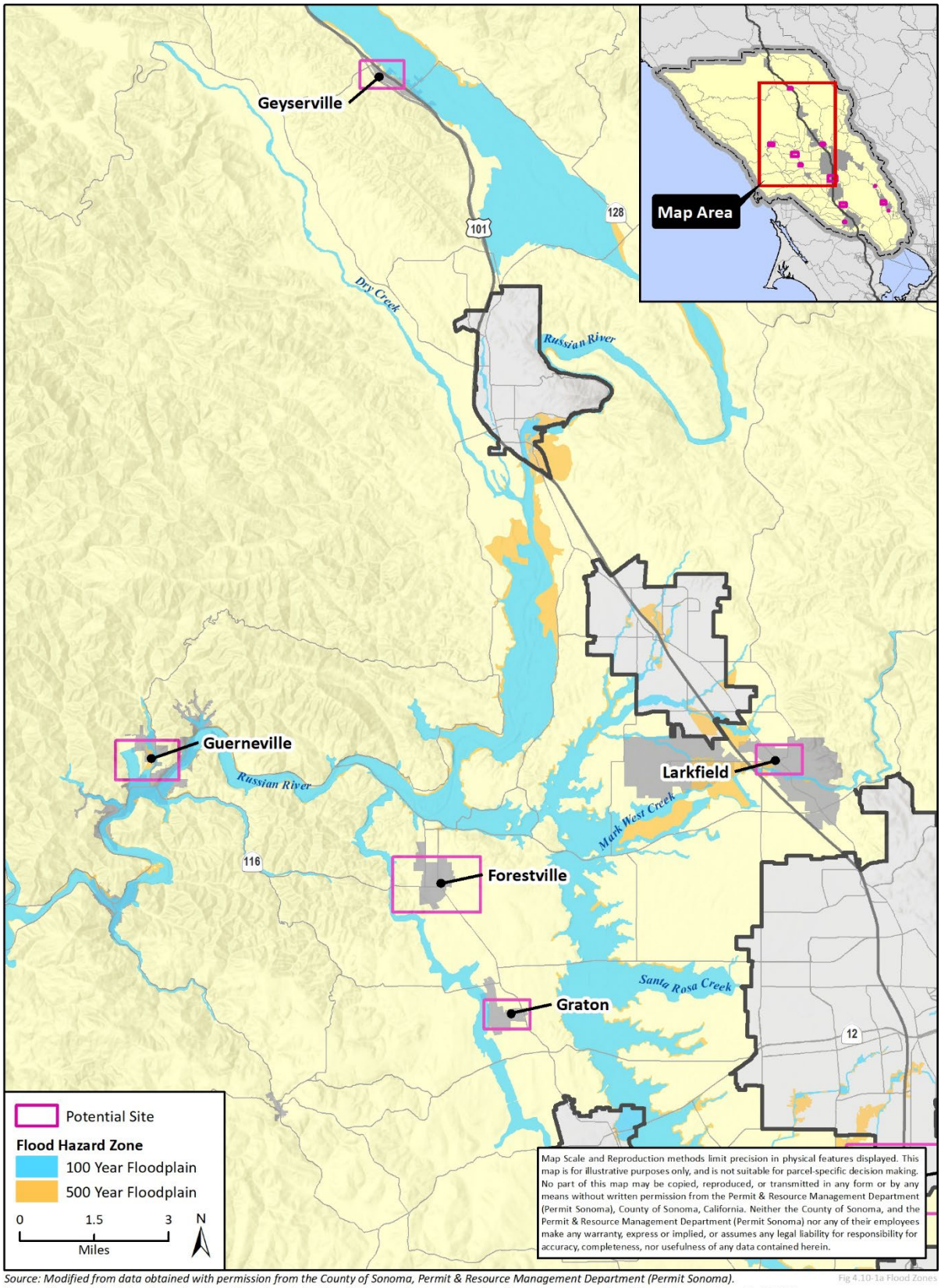

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Fig 4.10-1a Flood Zones

Figure 4.10-2 Creeks and Drainages in Sonoma County – Southern

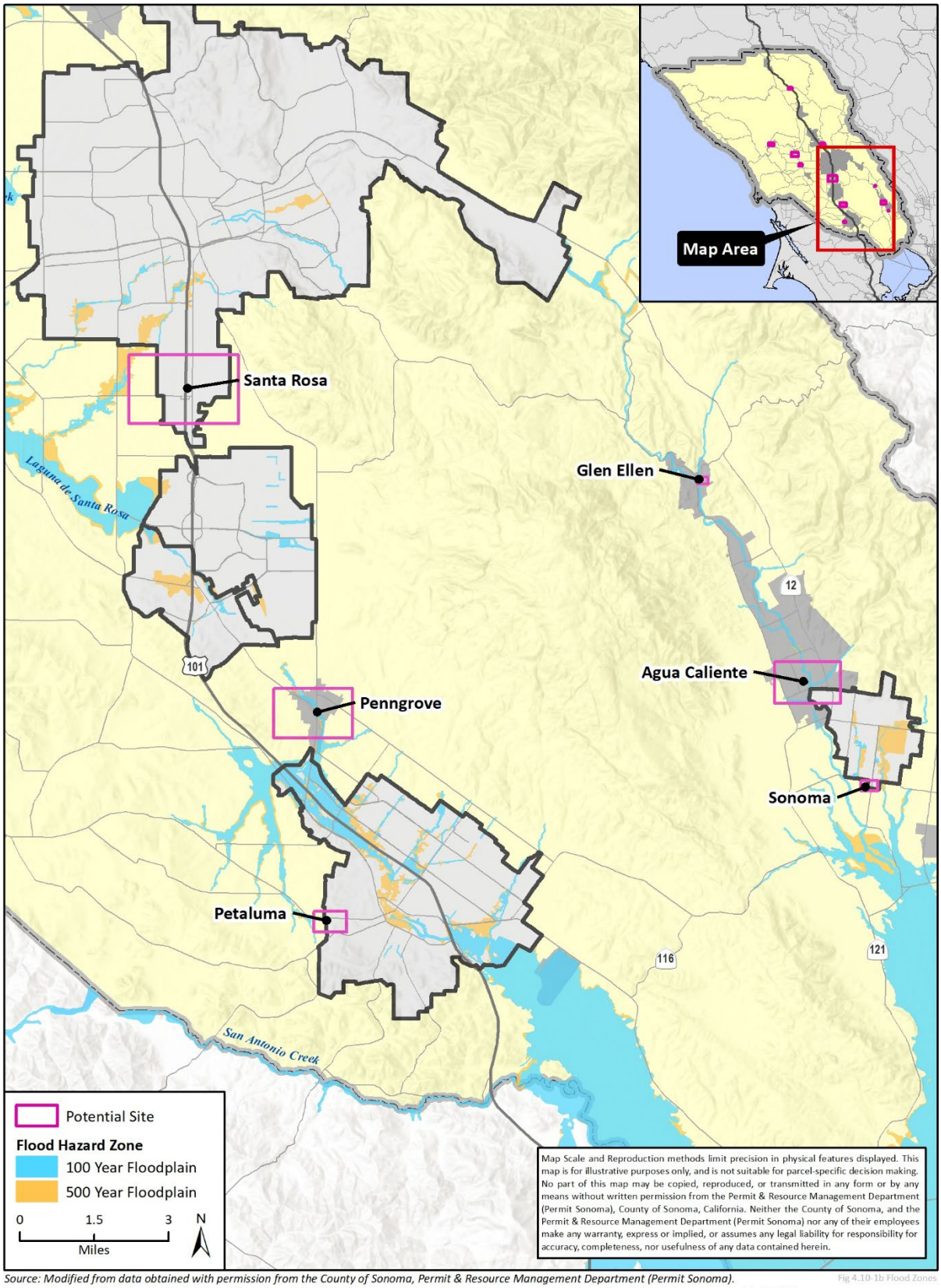

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Fig 4.10-1b Flood Zones

Figure 4.10-3 Groundwater Basins and Sub-basins in Sonoma County

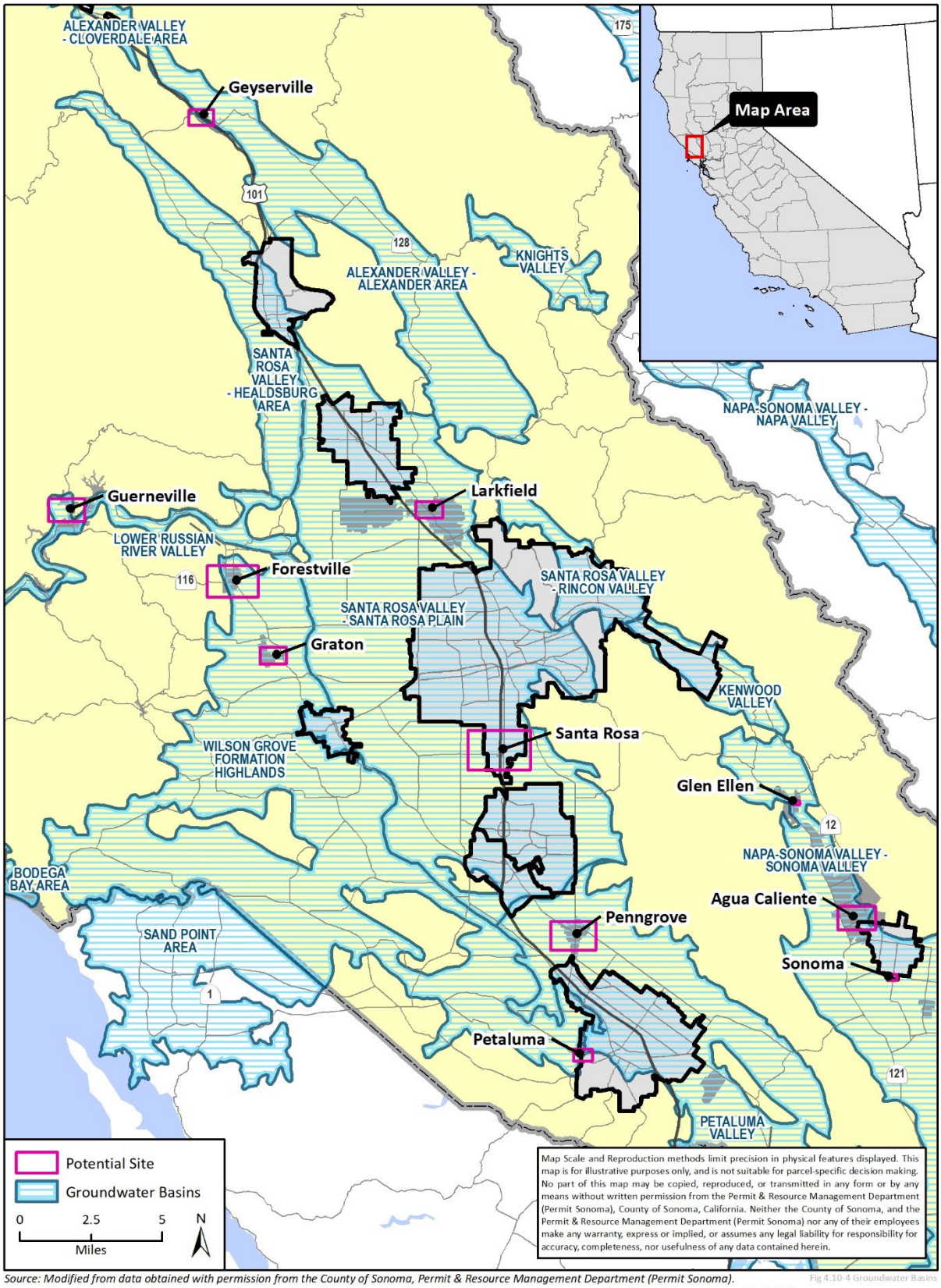

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Fig 4.10-4 Groundwater Basins

Surface Water

In Sonoma County, the Sonoma Creek and Petaluma River watersheds are in the San Francisco Bay Regional Water Quality Control Board (RWQCB) jurisdiction, and the remainder of the County is within the jurisdiction of the North Coast RWQCB. Waste discharge requirements are set by each RWQCB for point sources, including industrial and commercial uses, community wastewater management systems and individual septic systems (County of Sonoma 2008). Water quality issues in the County arise primarily from polluted runoff discharges, which can include pesticides, fertilizers, green waste, animal waste, human waste, petroleum hydrocarbons such as gasoline and motor oil, trash, and other constituents of concern. Stormwater flowing over roadways and other transportation assets carries urban pollutants through natural drainage systems or man-made storm drain structures to a body of surface water.

The State Water Resources Control Board (SWRCB), in compliance with Clean Water Act (CWA) Section 303(d), has prepared a list of impaired water bodies in the State of California. Table 4.10-3 lists the impaired water bodies in Sonoma County that are in the vicinity of the Rezoning Sites.

Table 4.10-3 Waterbody Impairments Near the Rezoning Sites

Water Body	Impairment Constituent(s)
Russian River HU, Lower Russian River HA, Guerneville HSA	Aluminum, indicator bacteria, sedimentation/siltation, specific conductivity, water temperature
Russian River HU, Lower Russian River HA, Guerneville HSA, Green Valley Creek watershed	Indicator bacteria, dissolved oxygen
Russian River HU, Middle Russian River HA, Geyserville HSA	Aluminum, diazinon, indicator bacteria, sedimentation/siltation, specific conductivity, water temperature
Russian River HU, Middle Russian River HA, Laguna HSA, mainstem Laguna de Santa Rosa	Indicator bacteria, mercury, dissolved oxygen, phosphorous, sedimentation/siltation, water temperature
Russian River HU Middle Russian River HA, Laguna HSA, tributaries to the Laguna de Santa Rosa (except Santa Rosa Creek and its tributaries)	Indicator bacteria, dissolved oxygen, sedimentation/siltation, water temperature
Russian River HU, Middle Russian River HA, Mark West HSA, mainstem Mark West Creek downstream of the confluence with the Laguna de Santa Rosa	Aluminum, manganese, dissolved oxygen, phosphorous, sedimentation/siltation, water temperature
Russian River HU, Middle Russian River HA, Mark West HSA, mainstem Mark West Creek upstream of the confluence with the Laguna de Santa Rosa	Sedimentation/siltation, water temperature
Russian River HU, Middle Russian River HA, Mark West HSA, tributaries to Mark West Creek (except Windsor Creek and its tributaries)	Sedimentation/siltation, water temperature
Russian River HU, Middle Russian River HA, Santa Rosa HSA, mainstem Santa Rosa Creek	Indicator bacteria, manganese, sedimentation/siltation, water temperature
Sonoma Creek, non-tidal	Pathogens, sedimentation/siltation,
Sonoma Creek, tidal	Nutrients, pathogens
Petaluma River	Diazinon, nutrients, pathogens, sedimentation/siltation, trash

Source: SWRCB 2022

To address surface water quality impairments, the North Coast RWQCB and San Francisco Bay RWQCB prescribe total maximum daily loads (TMDL) to impaired water bodies in Sonoma County for pathogens, fecal indicator bacteria, sedimentation, temperature, and mercury (San Francisco Bay RWQCB 2019; North Coast RWQCB 2022).

Groundwater

Water quality in Sonoma County varies depending on the underlying groundwater basin. None of the basins in the County are designated as critically over-drafted (DWR 2020), although some basins were given high priority under the Sustainable Groundwater Management Act (refer to Section 4.10.2, *Regulatory Setting*, below). Factors that contribute to the decline of groundwater quality include percolation of agricultural runoff contaminated with fertilizers and pesticides into the water table; percolation of water from public and private sewage treatment systems; and percolation of contaminated urban runoff.

The Alexander Valley basin, which underlies the Geyserville sites, exceeds the limits for secondary inorganics, but generally has good water quality (DWR 2004a). The Lower Russian River Valley basin, which underlies the Guerneville sites, has measured water quality impairments of primary and secondary inorganics as well as radiological constituents (DWR 2004b). Water quality constituents of concern in the Santa Rosa Plan Groundwater Basin include arsenic, nitrate, and salinity (measured as total dissolved solids). This basin encompasses the Larkfield and Santa Rosa sites (Santa Rosa Plan Groundwater Sustainability Agency 2022). The Wilson Grove Formation Highlands basin underlies the Forestville, Graton, and Petaluma sites, and has limited groundwater quality information, except for average total dissolved solids measurements of 253 milligrams per liter (DWR 2014). Water quality constituents of concern in the Sonoma Valley Groundwater Basin include arsenic, nitrate, and salinity (measured as total dissolved solids). This basin encompasses the Glen Ellen, Agua Caliente, and Sonoma sites (Sonoma Valley Groundwater Sustainability Agency 2022). Water quality constituents of concern in the Petaluma Valley Groundwater Basin include arsenic, nitrate, and salinity (measured as total dissolved solids). This basin encompasses the Penngrove sites (Petaluma Valley Groundwater Sustainable Agency 2022).

b. Water Supply

Various water districts provide water supply service in unincorporated Sonoma County, as described in Table 4.18-1 in Section 4.18, *Utilities and Service Systems*. The Sweetwater Springs Water District (SSWD) serves Site GUE-1; California Water Service Co. services the remaining Guerneville sites; California American Water (Cal-Am, a private water company) serves the Geyserville and Larkfield sites; the Penngrove/Kenwood Water Company serves the Penngrove sites; Forestville Water District services the Forestville sites, the City of Santa Rosa serves the Santa Rosa sites, the Valley of the Moon Water District serves the Glen Ellen and Agua Caliente sites, the City of Petaluma serves the Petaluma sites, the City of Sonoma serves the Sonoma sites, and private wells serve each of the Graton sites.

Sonoma Water provides wholesale water sourced primarily from the Russian River, with some groundwater extracted from the Santa Rosa Plain Groundwater Basin, to Forestville Water District, City of Santa Rosa, Cal-Am, Valley of the Moon Water District, Penngrove/Kenwood Water Company, City of Petaluma, and City of Sonoma. Sonoma Water's customers also receive water through local sources, including local surface water, local groundwater, and recycled water. SSWD supplies water extracted from groundwater near the Russian River. Table 4.10-4 provides the annual water supply of each water supplier to the Rezoning Sites.

Table 4.10-4 Water Supply in Sonoma County

Water Supplier	Surface Water Supply (AFY)	Groundwater Supply (AFY)	Aggregate Water Supply (AFY)
Sonoma Water[1]	75,000	2,300	77,300
SSWD[2]	–	1,137	1,137
Cal-Am[3]		1,556	1,556
California Water Service[4]	--	67	67
Total	75,000	5,060	80,060

[1] Source: Sonoma Water 2021

[2] Source: SSWD 2021

[3] Source: Appendix WSA

[4] Source: California Water Service 2022

Groundwater Recharge

During and after a storm event, rainfall may infiltrate into the ground surface, and move down through the soil as groundwater recharge. Land areas vary in their capacity to recharge based on soil conditions and the underlying geology. In Sonoma County, rivers and stream corridors are important sources for groundwater recharge, as are areas underlain by permeable geologic formations.

Groundwater generally occurs in geologic formations with high water-holding capacity (aquifers) on a local scale, and groundwater basins on a regional scale. Contiguous aquifers allow groundwater to migrate between them, and sometimes multiple aquifers occur, separated by less permeable or impermeable (clay) layers called aquacludes.

Groundwater is an important source of agricultural, industrial, and domestic water supply in Sonoma County. It is accessed through wells drilled into the zone of saturation. Not all areas in the County have groundwater present in sufficient volume to meet the requirements of areas otherwise suitable for development as the basin may have a lower rate of recharge or have insufficient potable water. Overdrawing the groundwater supply can lead to undesirable results, such as the following:

1. Physical harm to the aquifer from consolidation
2. Ground settlement
3. Reduced water quality from intrusion of less desirable water from other areas
4. Interference with prior rights of adjacent groundwater areas
5. Declines in the water table

Recharge of groundwater typically occurs along the major streams and their principal tributaries. The principal water bearing formations in Sonoma County groundwater basins are typically alluvium, a deposit of clay, silt, sand, and gravel left by flowing streams in a river valley or delta that typically produces fertile soil. While other geologic units can yield adequate amounts of water in some areas, much of the County may not have dependable groundwater supplies (County of Sonoma 2008).

Groundwater depth measurements near the Rezoning Sites are provided in Table 4.10-5, based on data provided by the United States Geological Survey for nearby wells.

Table 4.10-5 Approximate Depth to Groundwater near Rezoning Sites

Rezoning Sites	Nearest Groundwater Depth Measurement (year)
Geyserville	70 feet (2012)
Guerneville	24 feet (2019)
Larkfield	37 feet (2012)
Forestville, Graton	50 feet (1950)
Santa Rosa	16 feet (2012)
Glen Ellen	7.5 feet (2003)
Agua Caliente	25 feet (2003)
Penngrove	69 feet (2019)
Petaluma	79 feet (2012)
Sonoma	27 feet (2012)

Source: United States Geological Survey 2020

c. Hazards

Flooding and Dam Inundation

Flooding or inundation by water can occur because of storm events, dam failure, seiche, and tsunami. Flooding is the most frequent natural hazard impacting Sonoma County, with most frequent flooding occurring along the Russian River, Petaluma River, and Sonoma Creek, as well as tributaries within these watersheds. Figure 4.10-4 through Figure 4.10-8 shows the 100-year and 500-year floodplains in the region based on the floodplain mapping by the Federal Emergency Management Agency (FEMA). As shown therein, the following sites are partially within the 100-year floodplain: GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, and PEN-9.

Inundation can result from dam failure, which refers to the breakdown, collapse, or other failure of a dam structure characterized by the uncontrolled release of impounded water. The most common cause of dam failure is prolonged rainfall that produces flooding, although other causes include natural events such as earthquakes or landslides and structural deterioration. In the event of dam failure, inundation could affect Rezoning Sites located in Geyserville and Guerneville. Specifically, failure at Warm Springs Dam would result in flooding of Guerneville sites, and a failure at Coyote Valley Dam would result in flooding at Geyserville sites (County of Sonoma 2021).

Tsunami and Seiche

Tsunamis are high sea waves that are caused by earthquake, submarine landslide, or other disturbances. While the Pacific Ocean and San Pablo Bay bound Sonoma County to the west and south, respectively, none of the Rezoning Sites are in or near a designated tsunami inundation zone (California Department of Conservation 2022).

A seiche is a temporary disturbance or oscillation in water level of a lake or partially enclosed body of water, usually caused by changes in atmospheric pressure. There are several small lakes and reservoirs throughout the County, but none are within 0.5 mile of a Rezoning Site. While an earthquake could generate a seiche in these lakes and reservoirs, potential inundation would remain localized to low-lying areas along the perimeter of the reservoirs.

Figure 4.10-4 FEMA Floodplain Map – Countywide

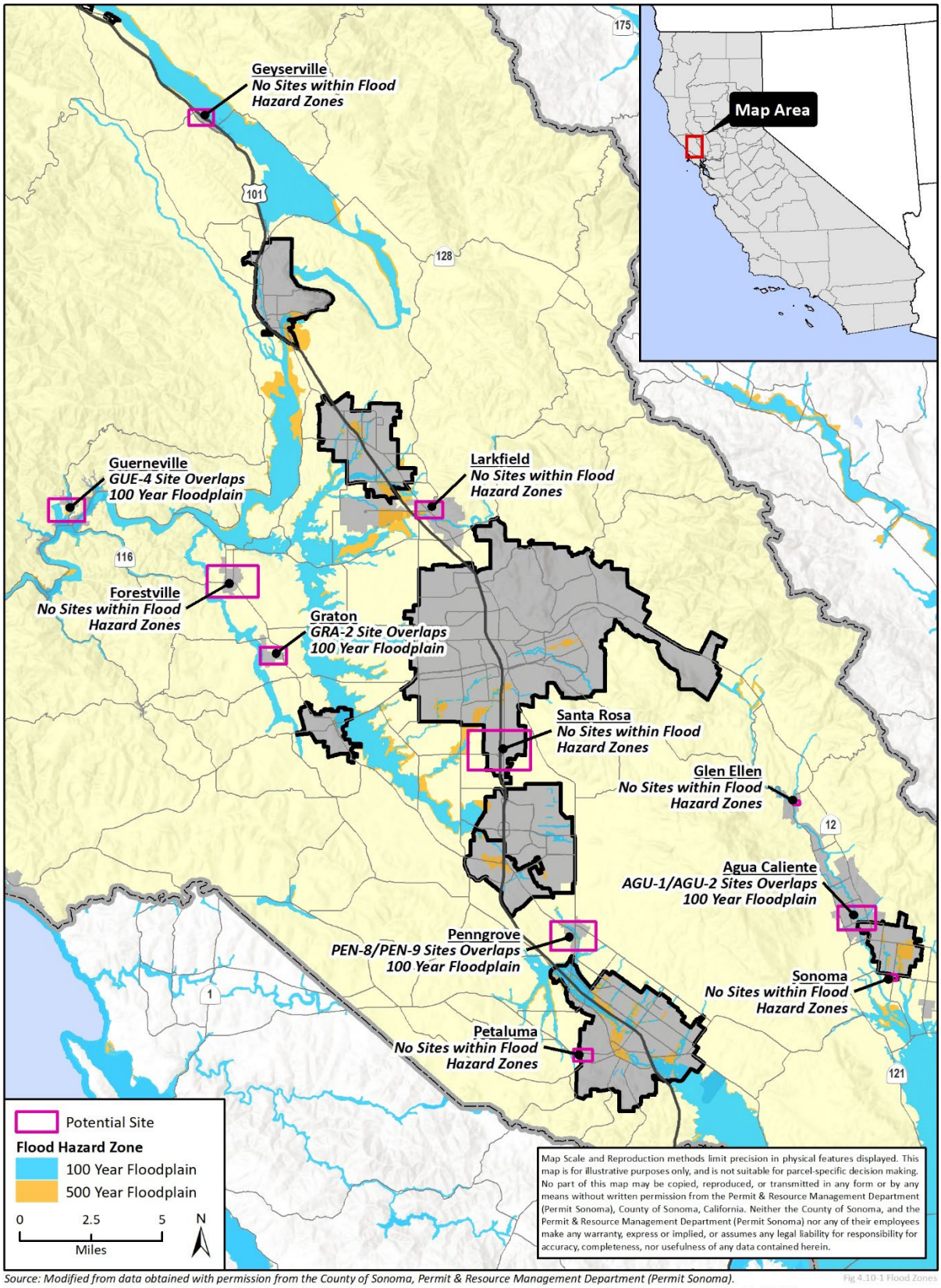

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Fig 4.10-1 Flood Zones

Figure 4.10-5 FEMA Floodplain Map – Guerneville

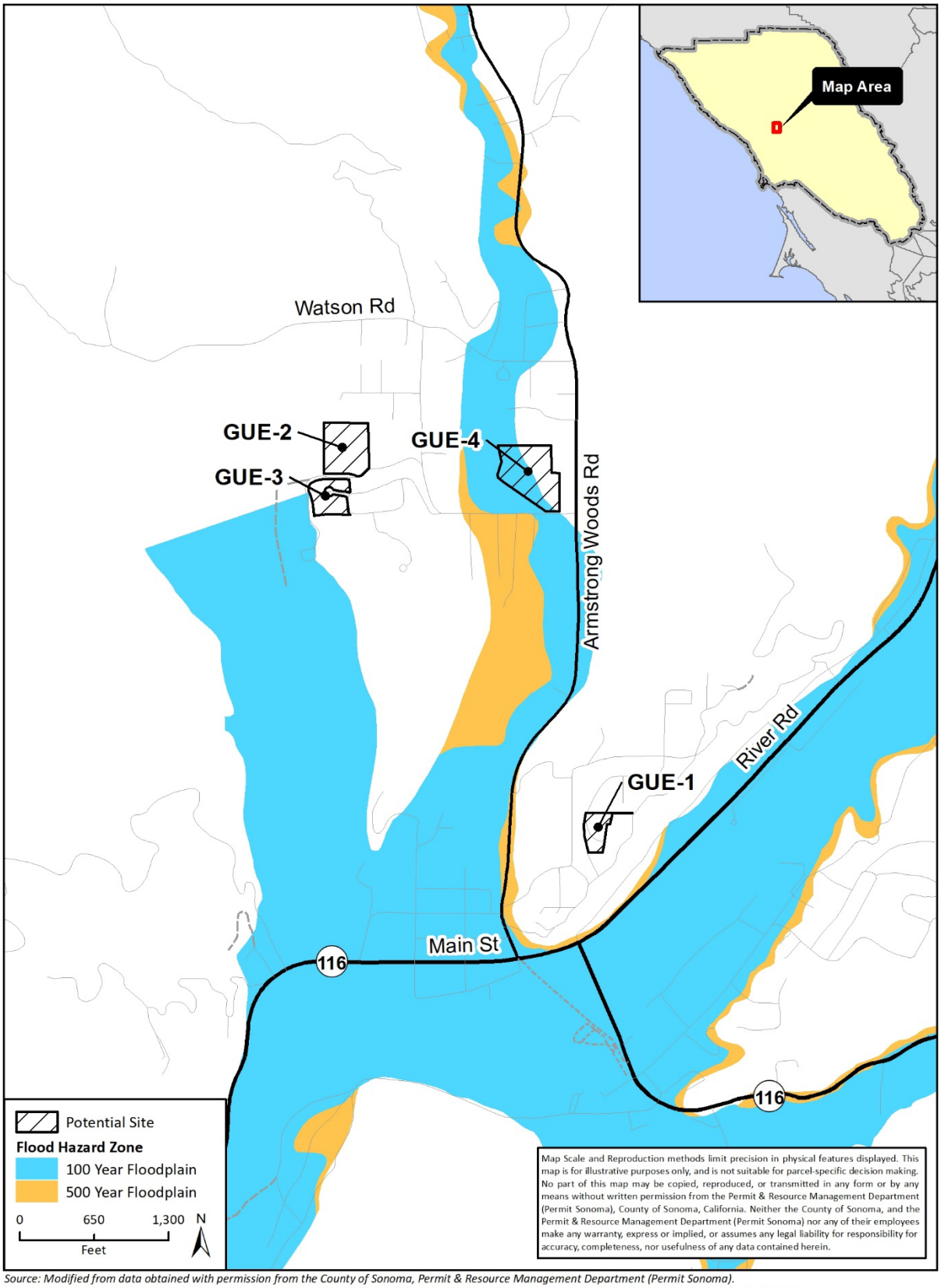

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Figure 4.10-6 FEMA Floodplain Map – Graton

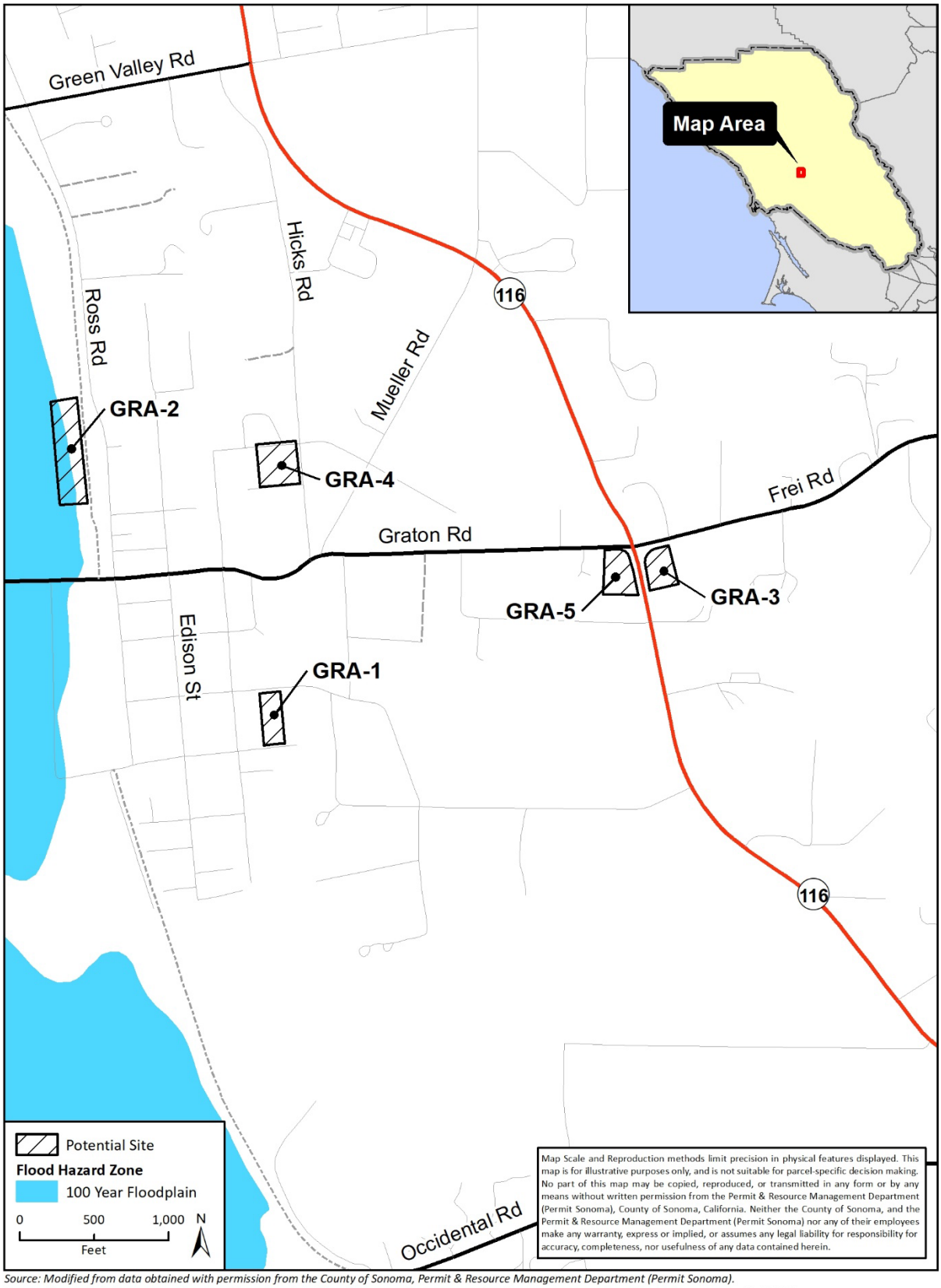

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Figure 4.10-7 FEMA Floodplain Map – Agua Caliente

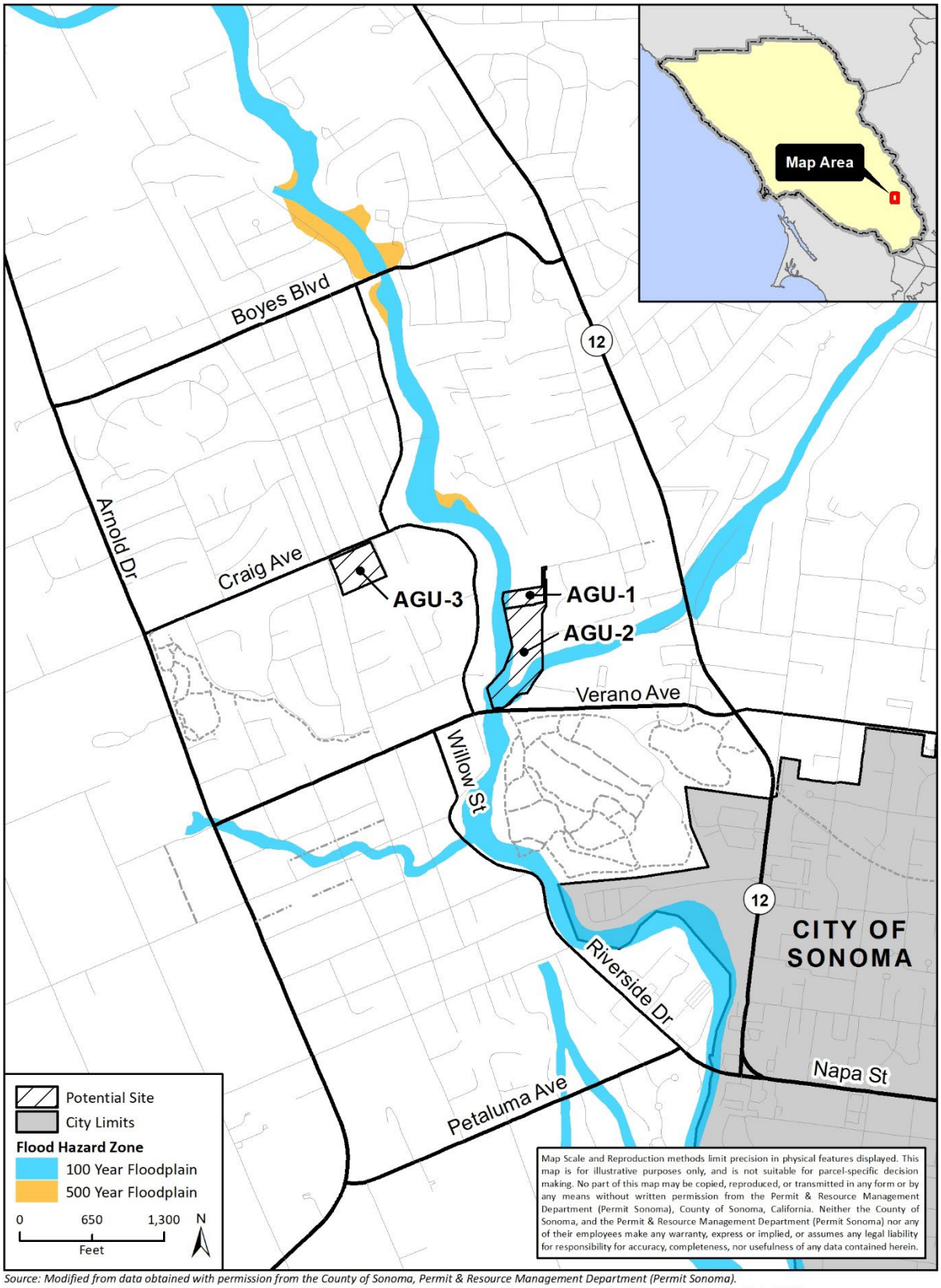

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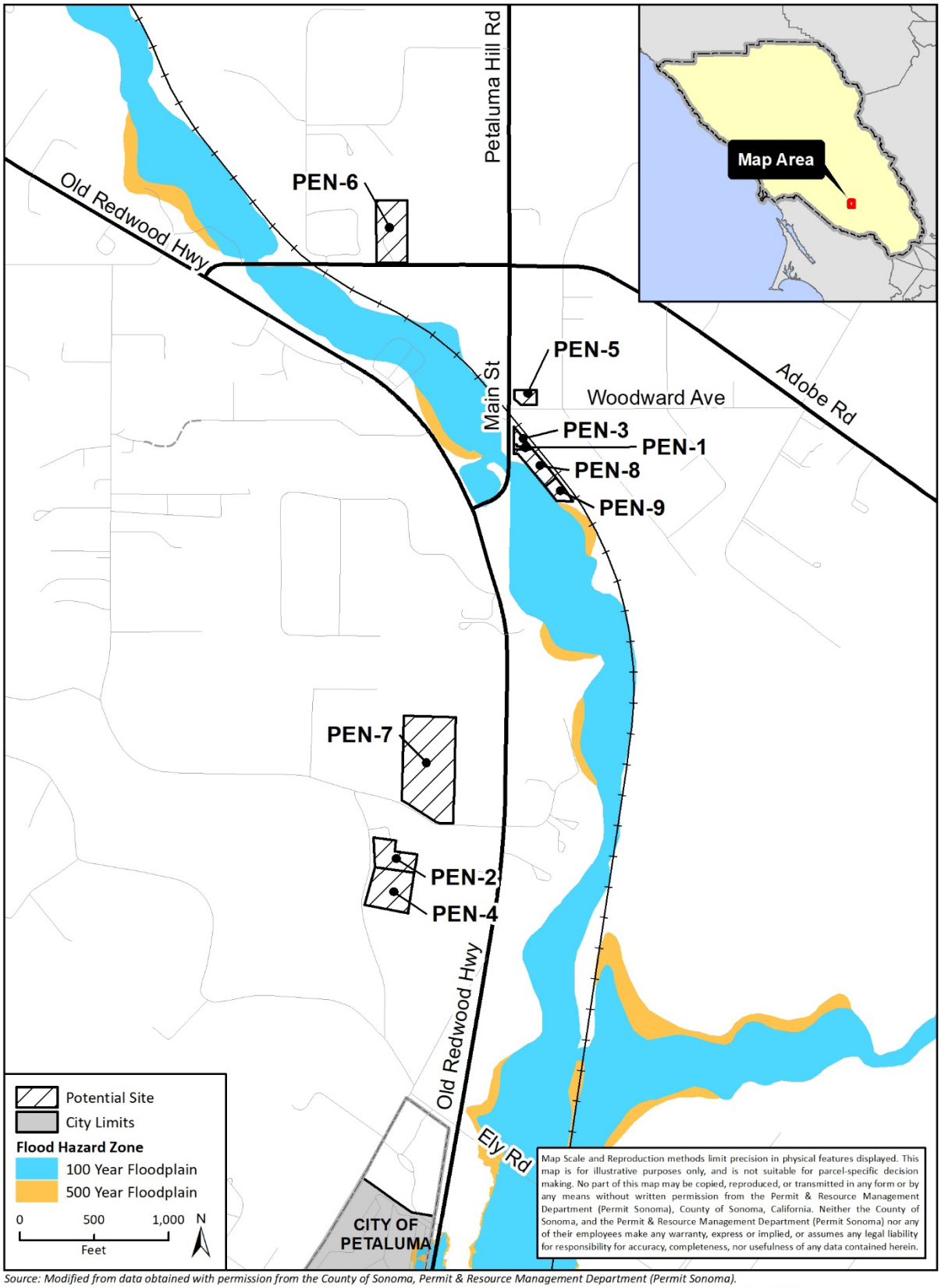
Figure 4.10-8 FEMA Floodplain Map – Penngrove



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4.10.2 Regulatory Setting

a. Federal

Clean Water Act

Congress enacted the CWA, formerly the Federal Water Pollution Control Act of 1972, to restore and maintain the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. Those discharges are regulated by the National Pollution Discharge Elimination System (NPDES) permit process (CWA Section 402). The SWRCB and its nine RWQCBs administer the NPDES permits. In Sonoma County, NPDES permits are administered by the North Coast RWQCB and San Francisco Bay RWQCB.

Individual projects that disturb more than one acre are required to obtain NPDES coverage under the California General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). The Construction General Permit requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) describing best management practices (BMP) the discharger would use to prevent and retain stormwater runoff. The SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if BMPs fail; and a sediment monitoring plan if the site discharges directly to a waterbody listed on the 303(d) list for sediment.

Section 401 of the CWA requires any activity that would result in discharge into waters of the U.S. be certified by the RWQCB. This certification ensures the proposed activity would not violate State and/or federal water quality standards. Section 404 of the CWA authorizes the U.S. Army Corps of Engineers to regulate the discharge of dredged or fill material to the waters of the U.S. and adjacent wetlands. Discharges to waters of the U.S. must be avoided where possible and minimized and mitigated where avoidance is not possible. Section 303(d) of the CWA requires states to establish TMDL programs for streams, lakes, and coastal waters that do not meet certain water quality standards.

Applicants of construction projects disturbing one or more acre of soil are required to file for coverage under the SWRCB, Order No. 99-08-DWQ, NPDES General Permit No. CAS000002 for Discharges of Storm Water Runoff Associated with Construction Activity (General Permit).

National Toxics Rule and California Toxics Rule

In 1992, USEPA promulgated the National Toxics Rule, 40 CFR 131, establishing numeric criteria for priority toxic pollutants in multiple states to bring all states into compliance with the Water Quality Standards (WQS) requirements of section 303(c) of the CWA. The National Toxics Rule established WQS for 42 pollutants not covered under California's Statewide water quality regulations at that time. After the court ordered revocation of California's Statewide Basin Plans in September 1994, USEPA initiated efforts to promulgate additional federal WQS for California. In May 2000, USEPA issued the California Toxics Rule, which includes all the priority pollutants for which the EPA has issued numeric criteria not included in the National Toxics Rule. The USEPA is in the process of rulemaking for setting a standard for selenium in the San Francisco Bay under the California Toxics Rule.

National Flood Insurance Act / Flood Disaster Protection Act

The National Flood Insurance Act of 1968 made flood insurance available for the first time. The Flood Disaster Protection Act of 1973 made the purchase of flood insurance mandatory for the protection of property located in Special Flood Hazard Areas. These laws are relevant because they led to mapping of regulatory floodplains and to local management of floodplain areas according to guidelines that include prohibiting or restricting development in flood hazard zones.

Federal Emergency Management Agency

FEMA administers the National Flood Insurance Program to provide subsidized flood insurance to communities that comply with FEMA regulations related to limiting development in floodplains. FEMA also issues Flood Insurance Rate Maps (FIRMs) that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community.

In 2000, FEMA adopted revisions to 44 CFR, known as the Disaster Mitigation Act (DMA) or DMA 2000. Section 322 (a-d) of the DMA 2000 requires local governments to have a Hazard Mitigation Plan as a condition of receiving federal disaster mitigation funds. The Hazard Mitigation Plan must:

1. Describe the process for assessing hazards, risks, and vulnerabilities
2. Identify and prioritize mitigation actions
3. Solicit input from the community (public), key stakeholders, and adjacent jurisdictions and agencies

Sonoma County's Hazard Mitigation Plan is discussed under *Regional and Local Regulations,* below.

b. State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act of 1967 requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The Water Quality Control Plan, or Basin Plan, protects designated beneficial uses of State waters through the issuance of waste discharge requirements and through the development of TMDLs. Anyone proposing to discharge waste that could affect the quality of the waters of the State must make a report of the waste discharge to the RWQCB or SWRCB as appropriate, in compliance with the Porter-Cologne Act.

California General Plan Law, Government Code Section 65302

Government Code Section 65302(a) requires cities and counties located within the State to review the Land Use, Conservation, and Safety elements of the general plan "for the consideration of flood hazards, flooding, and floodplains" to address flood risks. The code also requires cities and counties in the State to annually review the Land Use element with respect to "those areas covered by the plan that are subject to flooding identified by floodplain mapping" prepared by FEMA or the California DWR.

Sustainable Groundwater Management Act

In September 2014, Governor Brown signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater

Management Act gives local agencies the power to sustainably manage groundwater and requires Groundwater Sustainability Plans (GSP) to be developed for medium- and high-priority groundwater basins. The Larkfield and Santa Rosa sites fall under the jurisdiction of the Santa Rosa Plain Groundwater Sustainability Agency (GSA), which adopted a GSP in January 2022. The Glen Ellen, Agua Caliente, and Sonoma sites fall under the jurisdiction of the Sonoma Valley GSA, which similarly adopted a GSP in January 2022. The Penngrove sites fall under the jurisdiction of the Petaluma GSA, which also adopted a GSP in January 2022. While other Rezoning Sites are underlain by groundwater basins, they are not within the jurisdiction of a GSA.

Antidegradation Policy

California's antidegradation policy, formally known as the Statement of Policy with Respect to Maintaining High Quality Waters in California, restricts degradation of surface and ground waters. It protects waters where existing water quality is higher than necessary for the protection of beneficial uses. Any actions with the potential to adversely affect water quality must be consistent with the maximum benefit to the people of the State; not unreasonably affect present and anticipated beneficial use of the water; and not result in water quality less than prescribed in water quality plans and policies.

Cobey-Alquist Floodplain Management Act

The Cobey-Alquist Floodplain Management Act (Water Code Section 8400 et seq.) gives support to the National Flood Insurance Program by encouraging local governments to plan, adopt, and enforce land use regulations for floodplain management, to protect people and property from flooding hazards. The Act also identifies requirements that jurisdictions must meet to receive State financial assistance for flood control.

California Green Building Standards Code

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) includes mandatory measures for residential and nonresidential development. For example, Section 4.106.2 requires residential projects that disturb less than one acre and are not part of a larger common plan of development to manage stormwater drainage during construction through on-site retention basins, filtration systems, and/or compliance with a stormwater management ordinance. Section 5.106.1 requires newly constructed nonresidential projects and additions of less than one acre to prevent the pollution of stormwater runoff from construction through compliance with a local ordinance or implementing BMPs that address soil loss and good housekeeping to manage equipment, materials, and wastes. Section 5.303 sets measures for indoor water use for non-residential development requiring metering devices to conserve water.

Urban Water Management Planning Act

In 1983, the California Legislature enacted the Urban Water Management Planning Act (Water Code, Section 10610 et seq.), which requires urban water suppliers to develop water management plans to actively pursue the efficient use of available supplies. This Act also requires the provision of water service to be affordable to lower income households (Section 10631.1). Similarly, Government Code Section 65589.7 (Senate Bill [SB] 1087) requires water service providers to reserve water allocations for low-income housing. Every five years, water suppliers are required to develop Urban Water Management Plans (UWMP) to identify short-term and long-term water

demand management measures to meet growing water demands. Sonoma Water has prepared an UWMP, dated June 2021; SSWD's UWMP is dated June 2021.

State Water Conservation Requirements

Executive Order B-37-16 established a new water use efficiency framework for California. The order bolstered the state's drought resilience and preparedness by establishing longer-term water conservation measures that include permanent monthly water use reporting, new urban water use targets, reducing system leaks and eliminating clearly wasteful practices, strengthening urban drought contingency plans, and improving agricultural water management and drought plans. Based on monthly water use reporting, most urban water suppliers reported sufficient supplies to meet demand in three additional dry years and are not subject to state conservation mandates. On February 8, 2017, SWRCB adopted an emergency water conservation regulation to amend and extend the May 2016 regulation. The amended regulation allows certain suppliers the opportunity to submit or resubmit their water supply reliability assessments.

California Construction Stormwater Permit

The California Construction Stormwater Permit (Construction General Permit), adopted by the SWRCB, regulates construction activities that include soil disturbance of at least one acre of total land area. The Construction General Permit authorizes the discharge of stormwater to surface waters from construction activities. It prohibits the discharge of materials other than stormwater, authorized non-stormwater discharges, and all discharges that contain a hazardous substance in excess of reportable quantities established at 40 CFR 117.3 or 40 CFR 302.4, unless a separate NPDES Permit has been issued to regulate those discharges.

The Construction General Permit requires that all developers of land where construction activities will occur over more than one acre do the following:

1. Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three Risk Levels established in the General Permit
2. Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters
3. Develop and implement a SWPPP which specifies BMPs that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards
4. Perform inspections and maintenance of all BMPs

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment and pollutants from construction materials, and address post construction runoff. The SWPPP also includes a plan for inspection and maintenance of all BMPs, as well as procedures for altering or increasing BMPs based on changing project conditions.

c. Regional and Local

Municipal Separate Storm Sewer System

RWQCBs issue stormwater discharge permits, with a Phase I Municipal Separate Storm Sewer System (MS4) (Order R1-2015-0030) applicable to sites in the North Coast Region RWQCB (including Rezoning Sites in Guerneville, Larkfield, Forestville, Graton, and Santa Rosa); and a Phase II MS4 (Order 2013-001-DWQ) applicable to sites in the San Francisco Bay RWQCB (including Rezoning Sites

in Glen Ellen, Agua Caliente, Penngrove, Petaluma, and Sonoma) (County of Sonoma 2022). No MS4 permits are established for the remaining areas of the County (including Geyserville Rezoning Sites) (County of Sonoma 2022). The County, City of Santa Rosa, and Sonoma Water implement the Phase II MS4 permit. The MS4 programs implement and enforce BMPs to reduce the discharge of pollutants from municipal separate storm sewer systems.

Low Impact Development Manual

The 2017 Storm Water Low Impact Development Technical Design Manual (LID Manual) provides technical guidance for project designs that require the implementation of permanent stormwater BMPs. This manual supersedes the 2005 Standard Urban Storm Water Mitigation Plan and satisfies Order R1-2015-0030, NPDES Permit CA0025054. While the City of Santa Rosa maintains the LID Manual, the County of Sonoma is a co-permittee along with the City and implements the LID Manual on projects in the Unincorporated County (City of Santa Rosa 2017).

Sonoma County Multijurisdictional Hazard Mitigation Plan

Sonoma County's Multi-Jurisdictional Hazard Mitigation Plan fulfills the requirements of the 2000 Disaster Mitigation Act as discussed under *Federal Regulation*, above. The Multi-jurisdictional Hazard Mitigation Plan includes actions the County is taking to mitigate impacts from flood events, dam failure, and sea level rise.

Sonoma County General Plan

The County General Plan was adopted by the Sonoma County Board of Supervisors Resolution 08-0808 on September 23, 2008. The County General Plan includes broad goals and policies aimed at protecting the County's water supply and water quality and protecting against flood hazards. Goals and policies from the County General Plan are provided below.

Goal WR-1: Protect, restore, and enhance the quality of surface and groundwater resources to meet the needs of all reasonable beneficial uses.

Objective WR-1.2: Avoid pollution of stormwater, water bodies and groundwater.

Policy WR-1c: Prioritize stormwater management measures in coordination with the RWQCB direction, focusing first upon watershed areas that are urbanizing and watersheds with impaired water bodies. Work cooperatively with the RWQCBs to manage the quality and quantity of stormwater runoff from new development and redevelopment in order to:

(1) Prevent, to the maximum extent practicable, pollutants from reaching stormwater conveyance systems.

(2) Ensure, to the maximum extent practicable, that discharges from regulated municipal storm drains comply with water quality objectives.

(3) Limit, to the maximum extent practicable, stormwater from post development sites to pre-development quantities.

(4) Conserve and protect natural areas to the maximum extent practicable.

Policy WR-1g**:** Minimize deposition and discharge of sediment, debris, waste and other pollutants into surface runoff, drainage systems, surface water bodies, and groundwater.

Policy WR-1h: Require grading plans to include measures to avoid soil erosion and consider upgrading requirements as needed to avoid sedimentation in stormwater to the maximum extent practicable.

Policy WR-1g: Require new development projects to evaluate and consider naturally occurring and human caused contaminants in groundwater.

Goal WR-2: Manage groundwater as a valuable and limited shared resource.

Objective WR-2.3: Encourage new groundwater recharge opportunities and protect existing groundwater recharge areas.

Objective WR-2.5: Avoid additional land subsidence caused by groundwater extraction.

Policy WR-2e: Require proof of groundwater with a sufficient yield and quality to support proposed uses in Class 3 and 4 water areas.[1] Require test wells or the establishment of community water systems in Class 4 water areas. Test wells may be required in Class 3 areas. Deny discretionary applications in Class 3 and 4 areas unless a hydrogeologic report establishes that groundwater quality and quantity are adequate and will not be adversely impacted by the cumulative amount of development and uses allowed in the area, so that the proposed use will not cause or exacerbate an overdraft condition in a groundwater basin or subbasin. Procedures for proving adequate groundwater should consider groundwater overdraft, land subsidence, saltwater intrusion, and the expense of such study in relation to the water needs of the project.

Goal WR-4: Increase the role of conservation and safe, beneficial reuse in meeting water supply needs of both urban and rural users.

Objective WR-4.1: Increase the use of recycled water where it meets all applicable regulatory standards and is the appropriate quality and quantity for the intended use.

Objective WR-4.2: Promote and encourage the efficient use of water by all water users.

Objective WR-4.3: Conserve and recognize stormwater as a valuable resource.

Policy WR-4b: Use water effectively and reduce water demand by developing programs to:

(1) Increase water conserving design and equipment in new construction, including the use of design and technologies based on green building principles,

(2) Educate water users on water conserving landscaping and other conservation measures,

(3) Encourage retrofitting with water conserving devices,

(4) Design wastewater collection systems to minimize inflow and infiltration, and

(5) Reduce impervious surfaces to minimize runoff and increase groundwater recharge.

Policy WR-4e: Require water conserving plumbing and water conserving landscaping in all new development projects and require water conserving plumbing in all new dwellings. Promote programs to minimize water loss and waste by public water suppliers and their customers. Require County-operated water systems to minimize water loss and waste.

Policy WR-4g: Require that development and redevelopment projects, where feasible, retain stormwater for on-site use that offsets the use of other water.

[1] Class 3 refers to a marginal groundwater area. Class 4 refers to low/highly variable water yield areas.

Goal PS-2: Reduce existing flood hazards and prevent unnecessary exposure of people and property to risks of damage or injury from flood hazards.

Objective PS-2.2: Regulate new development to reduce the risks of damage and injury from known flooding hazards to acceptable levels.

Policy PS-2e: Expand the County's zero net fill requirements to address all areas of the Unincorporated County that are located within the 100-year FEMA special flood hazard area.

Policy PS-2f: Preserve floodplain storage capacity by avoiding fill in areas outside of the 100-year FEMA special flood hazard area that retain or could retain flood waters.

Policy PS-2m: Regulate development, water diversion, vegetation management, grading, and fills to minimize any increase in flooding and related damage to people and property.

Policy PS-2o: Costs for drainage facilities to handle the surface runoff from new development shall be the responsibility of the new development.

Policy PS-2p: Require that design and construction of drainage facilities be subject to the review and approval of the Permit and Resource Management Department.

Sonoma County Code

Chapter 7B, Flood Damage Prevention, of the Sonoma County Code requires permits be obtained prior to constructing residences in any area of special flood hazard, anchoring of new construction in areas of special flood hazard to prevent movement or collapse of a structure, the use of flood resistant materials and utility equipment in new construction, and elevation of the lowest residential floor to 12 inches above the base flood elevation.

Chapter 11, Construction Grading and Drainage, of the Sonoma County Code protects watercourses from construction practices that could result in pollutants entering the soil or watercourses through requiring best management practices be implemented and requiring construction grading permits and construction drainage permits.

Chapter 11A, Stormwater Quality, of the Sonoma County Code includes regulations to protect water quality, including prohibiting the discharge of non-stormwater into the County's stormwater system, compliance with NPDES permits for stormwater discharge, requiring measures to reduce and eliminate stormwater pollutants, and requiring the implementation of construction best management practices to prevent the discharge of contaminants.

Section 26-56, F1 Floodway Combining District (applies to GUE-4), of the Sonoma County Code includes development standards related to bank stabilization and building materials and placement, the provision of engineering studies determining bank erosion effects, eliminating the placement of fill in the Laguna de Santa Rosa, and stream or floodway diversions or alterations.

Section 26-56, F2 Floodplain Combining District (applies to GUE-3, GUE-4, GRA-2, AGU-1, AGU-2, and PEN-8), of the Sonoma County Code includes development standards intended to prevent the encroachment of flood waters on adjacent properties and prevent an increase in flood heights that could cause increased danger to life and property, including compliance with Chapter 7B of the Code, provision of engineering studies determining the effects of flooding on proposed structures, incorporation of design features that reduce the likelihood of flood damage, and eliminating the placement of fill in the Laguna de Santa Rosa.

Water Quality Control Plans

The North Coast RWQCB completed a Water Quality Control Plan (WQCP) for the North Coast Region in June 2018 (North Coast RWQCB 2018). This plan applies to Rezoning Sites in Geyserville, Guerneville, Larkfield, Forestville, Graton, and Santa Rosa. The San Francisco Bay RWQCB completed a WQCP for the Bay Area Region in 2019 (San Francisco Bay RWQCB 2019). This plan applies to sites in Glen Ellen, Agua Caliente, Penngrove, Petaluma, and Sonoma. Both WQCPs identify the beneficial uses for water bodies within the respective regions and provides implementation actions and strategies to achieve the water quality objectives set forth in the WQCPs.

4.10.3 Impact Analysis

a. Significance Thresholds and Methodology

This section describes the potential environmental impacts of the development facilitated by the project relevant to hydrology and water quality. The impact analysis is based on an assessment of baseline conditions for the Rezoning Sites, including surface water, groundwater, and floodplains, as described above under Section 4.10.1, *Environmental Setting*. This analysis identifies potential impacts based on the predicted interaction between the affected environment and construction, operation, and maintenance activities related to the development facilitated by the project, and recommends mitigation measures, when necessary, to avoid or minimize impacts.

The following thresholds of significance are based on Appendix G to the *CEQA Guidelines*. For the purposes of this Program EIR, project implementation may have a significant adverse impact if it would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would
    a. Result in substantial erosion or siltation on- or off-site
    b. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site
    c. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff
    d. Impede or redirect flood flows
4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan

b. Project Impacts and Mitigation Measures

Threshold:	Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact HWQ-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT VIOLATE WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS, OR OTHERWISE SUBSTANTIALLY DEGRADE SURFACE OR GROUNDWATER QUALITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Construction activities associated with development facilitated by the project would include installation and realignment of utilities, demolition of existing structures, new development, and the replacement and/or improvement of drainage facilities. Construction activities could result in soil erosion due to earth-moving activities such as excavation, grading, soil compaction and moving, and soil stockpiling. The Rezoning Sites vary in elevation and slope by location. Runoff during storm events typically occurs as sheet flow across the Rezoning Sites. The types of pollutants contained in runoff from construction sites may include sediment and other existing contaminants such as nutrients, pesticides, herbicides, trace metals, and hydrocarbons that can attach to sediment and be transported downstream through erosion via overland flow, ultimately entering nearby waterways and contributing to degradation of water quality.

Construction activities would utilize hazardous materials such as diesel fuel, gasoline, lubricant oils, hydraulic fluid, antifreeze, transmission fluid, cement slurry, and other fluids required for the operation of construction vehicles or equipment. These types of hazardous materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by county, state, and federal regulations and compliance with applicable standards discussed in Section 4.9, *Hazards and Hazardous Materials*. Direct contamination of surface water is also unlikely because no defined stream channels or perennial waters are present in the Rezoning Sites.

Development facilitated by the project would be required to comply with State and local water quality regulations designed to control erosion and protect water quality during construction. This includes compliance with the requirements of the SWRCB Construction General Permit, which requires preparation and implementation of a SWPPP for projects that disturb one acre or more of land. Rezoning Sites greater than one acre in size (including all GEY, GUE, FOR, GRA, AGU, and PET sites; in addition to LAR-1, LAR-5, LAR-7, SAN-1 through SAN-7, SAN-9, SAN-10, PEN-2, PEN-4, PEN-6, PEN-7, SON-2, and SON-3) would be subject to the SWRCB Construction General Permit and would be required to develop a SWPPP, including erosion and sediment control BMPs that would meet or exceed measures required by the Construction General Permit. Construction BMPs could include inlet protection, silt fencing, fiber rolls, stabilized construction entrances, stockpile management, solid waste management, and concrete waste management. Post-construction stormwater performance standards are also required to specifically address water quality and channel protection events. Implementation of the required SWPPP would reduce the potential for eroded soil and any contaminants attached to that soil to contaminate a waterbody following a storm event.

All sites would be required to comply with Sonoma County Code regarding the water quality of discharges from project sites, such as Section 11.14.040 requirements to convey runoff to disposal locations that maximize infiltration and minimize erosion. This requirement protects water quality.

Rezoning Sites would be subject to the applicable NPDES MS4 Permit (based on site location) and Chapters 11 and 11A of the Sonoma County Code, which require measures to reduce and eliminate stormwater pollutants, installation of appropriate BMPs to control stormwater runoff from construction sites, maintain or reduce stormwater runoff volumes and rates, and that grading and drainage permits be obtained prior to construction. The County also requires future development to comply with the LID Manual, which satisfies Order R1-2015-0030, NPDES Permit CA0025054 through the requirement of various low impact development measures. Grading and drainage plans accompanying the permit application must include BMPs for erosion prevention and sediment control, fencing at waterways and in sensitive areas, and limitation of disturbed areas through temporary features. The permit applications must also demonstrate compliance with NPDES MS4 permit provisions.

Compliance with the regulations and policies discussed above would reduce the risk of water degradation from soil erosion and other pollutants related to construction activities. Because violations of water quality standards would be minimized through existing regulations, impacts to water quality from construction activities from development facilitated by the project would be less than significant.

Operation

Development facilitated by the project would result in a net increase of impervious surfaces throughout the Rezoning Sites. On-site development and any associated off-site improvements greater than one acre in size would need to comply with the NPDES Construction General Permit, which requires the development of a SWPPP, as described in detail above. SWPPP implementation would reduce the risk of water degradation on site and off site from soil erosion and other pollutants related to project operation because a SWPPP requires the design, installation, and maintenance of post-construction stormwater controls.

As described in Section 4.10.2, *Regulatory Setting*, above, storm drain systems in the County are operated under NPDES MS4 General Permits. The purpose of the regional MS4 permitting program is to implement and enforce BMPs to reduce the discharge of pollutants from municipal separate storm sewer systems. To achieve compliance with the regional program, and thus conditions of the MS4 General Permit, the County requires compliance with the applicable MS4 General Permit be demonstrated during the grading permit application phase.

Pursuant to Chapters 11 and 11A of the Sonoma County Code, the County requires measures to reduce and eliminate stormwater pollutants and BMPs to control stormwater runoff from Rezoning Sites, in addition to grading and drainage permits. These requirements may include a combination of structural and nonstructural BMPs and may include requirements to ensure the proper long-term operation and maintenance of these BMPs.

In addition to stormwater runoff, polluted wastewater could be discharged by development facilitated by the project. Development facilitated by the project would increase wastewater flows to the applicable local wastewater purveyor. The Sonoma County Code Section 24-27 prohibit the discharge of industrial waste or any garbage, except shredded garbage, or any solids, semi-solid or liquid substances resulting from any garbage, service station, or automobile wash-rack into the sanitary sewer system. Required compliance with the Code would ensure that wastewater discharges to the sanitary sewer system and local wastewater treatment plants are properly and effectively treated to meet or exceed discharge requirements of the NPDES/Waste Discharge Requirement permit.

In addition, wastewater purveyors collect monthly fees from system users for wastewater flows. Development associated with the proposed project would be subject to user fees, which would in turn fund any necessary operating and capacity infrastructure needs for wastewater flows.

Implementation of the regulations, permit requirements, BMPs, and policies described above would prevent or minimize impacts related to water quality and ensure that development facilitated by the project would not cause or contribute to the degradation of water quality in receiving waters. Development facilitated by the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality, and water quality impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact HWQ-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT INTERFERE SUBSTANTIALLY WITH GROUNDWATER RECHARGE SUCH THAT THE PROJECT MAY IMPEDE SUSTAINABLE GROUNDWATER MANAGEMENT OF LOCAL GROUNDWATER BASINS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would increase the demand for water, most of which would derive from groundwater sources in the County. Impact HWQ-3 focuses upon physical interference associated with impervious surfaces.

The project would increase the amount of impervious surface area on the Rezoning Sites. However, development facilitated by the project would be required to comply with the LID Manual, which requires the implementation of permanent stormwater BMPs for projects that create or replace 10,000 square feet or more of impervious surfaces. These BMPs would encourage groundwater recharge through the construction of stormwater capture basins, which would percolate captured surface water into the soil on site. Per General Plan Policy WR-2e, development in Class 3 water areas (i.e., marginal groundwater areas), which includes Larkfield and Glen Ellen Rezoning Sites) would be required to establish adequate groundwater quality and quantity prior to development. However, Policy WR-2e would only apply if development facilitated by the project on the Rezoning Sites would be served by a private on-site well. Furthermore, policies under General Plan Goal WR-4 encourage water conservation, which would decrease the project's demand on water throughout the County and therefore decrease the demand on local groundwater supplies. Compliance with these existing requirements would ensure that impacts to groundwater supplies would be less than significant.

Construction of residential housing structures associated with the project may require subsurface support and foundations. Utility infrastructure serving these uses, such as sanitary sewer pipe and water mains, would be located below ground surface. Although the construction of support and foundations for structures and subsurface infrastructure could contact groundwater in limited instances, the displaced volume would not be substantial relative to the storage volume of the

underlying groundwater basins. Additionally, utility infrastructure and foundations for residential development would not extend to depths of groundwater aquifers and storage. Due to the depth of groundwater (refer to Table 4.10-5), dewatering activities are unlikely to occur for most Rezoning Sites, with the potential exception of Glen Ellen sites. If required, dewatering activities required for construction could also remove groundwater, but the volume of water removed would not be substantial relative to groundwater pumping for water supply. Dewatering would be temporary, and groundwater levels would recover following construction. Water used during construction for cleaning, dust control, and other uses would be nominal. Thus, construction activities would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge.

The project would not interfere substantially with groundwater recharge. Therefore, groundwater impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?
Threshold:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
Threshold:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Impact HWQ-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD ALTER DRAINAGE PATTERNS AND INCREASE RUNOFF IN THE REZONING SITES, BUT WOULD NOT RESULT IN SUBSTANTIAL EROSION OR SILTATION ON OR OFF SITE, RESULT IN INCREASED FLOODING ON OR OFF SITE, EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS, OR GENERATE SUBSTANTIAL ADDITIONAL POLLUTED RUNOFF. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Construction activities would involve stockpiling, grading, excavation, dredging, paving, and other earth-disturbing activities that could temporarily alter existing drainage patterns. As described under Impact HWQ-1 above, compliance with SWRCB's NPDES Construction General Permit, NPDES MS4 General Permits, and the Sonoma County Code would reduce the risk of short-term erosion

and increased runoff resulting from drainage alterations during construction. Therefore, impacts would be less than significant.

Operation

Development facilitated by the project would alter the existing drainage patterns in the Rezoning Sites through introduction of new impervious surfaces and infrastructure. New impervious surfaces could increase the rate and/or amount of surface runoff, redirect runoff to different discharge locations, or concentrate runoff from sheet flow to channelized flow. Surface water runoff rate and amount is determined by multiple factors, including the amount and intensity of precipitation, amount of other imported water that enters a watershed, and amount of precipitation and imported water that infiltrates to the groundwater. Infiltration is also determined by several factors, including soil type, antecedent soil moisture, rainfall intensity, the amount of impervious surface in a watershed, and topography. The rate of surface runoff is largely determined by topography. Runoff that does not infiltrate and flows off site would be captured in local storm drain systems (where present), and ultimately discharge to local surface waters.

Impact HWQ-1 discusses applicable regulations that would limit pollutant discharges, including sediment and silt, from the project. As discussed above for Impact HWQ-1, the Sonoma County Code requires measures to reduce and eliminate stormwater pollutants and implementation of BMPs to control stormwater runoff from construction sites, in addition to grading and drainage permits. The County requires compliance with the applicable MS4 General Permit and LID Manual be demonstrated during the grading permit application phase. Additionally, on-site development and any associated off-site improvements greater than one acre in size would be required to comply with the NPDES Construction General Permit, which requires the development of a SWPPP, as described in detail above.

The Sonoma County General Plan includes goals and policies that are intended to reduce flood hazards through minimal alterations to designated floodplains, which would reduce the potential for increased susceptibility to flooding on or offsite. Implementation of these goals and policies would ensure that the runoff from development facilitated by the project does not exceed the capacity of existing and future storm drain systems. Impacts would be less than significant.

The project would not alter the existing drainage patterns or contribute runoff water in a manner which would result in substantial erosion, siltation, or flooding, nor would it exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Impact HWQ-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD ALTER DRAINAGE PATTERNS ON AND INCREASE RUNOFF FROM THE REZONING SITES. THE REZONING SITES WITHIN AN AREA AT RISK FROM INUNDATION BY FLOOD HAZARD WOULD BE REQUIRED TO COMPLY WITH APPLICABLE GENERAL PLAN GOALS AND POLICIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As stated in Section 4.10.1, *Environmental Setting*, the following Rezoning Sites are partially within a 100-year flood hazard area: GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, and PEN-9. Development facilitated by the project would not impede or redirect flood flows on the remaining Rezoning Sites. For the sites partially within the 100-year floodplain, development would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. This includes achieving zero net fill within these sites following development, avoiding fill in areas that retain flood waters, and requiring review and approval of proposed drainage facilities by Permit Sonoma. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. Therefore, increased flooding on adjacent parcels to the Rezoning Sites would not occur because of the project.

As described previously, development facilitated by the project would be subject to County requirements (in both the General Plan and Code) for stormwater quality runoff from Rezoning Sites (refer to Impact HWQ-1). Therefore, the project would not risk release of pollutants due to flood inundation. Impacts related to flood flows and project inundation would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Impact HWQ-5 THE REZONING SITES ARE NOT WITHIN AN AREA AT RISK FROM INUNDATION BY SEICHE OR TSUNAMI, AND THEREFORE WOULD NOT BE AT RISK OF RELEASE OF POLLUTANTS DUE TO PROJECT INUNDATION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As stated in Section 4.10.1, *Environmental Setting*, the Rezoning Sites are not located in a tsunami or seiche zone. Therefore, development facilitated by the project would not risk release of pollutants due to tsunami or seiche inundation of the Rezoning Sites. Impacts related to flood flows and project inundation would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HWQ-6 DEVELOPMENT FACILITATED BY THE PROJECT WOULD COMPLY WITH ADOPTED WATER QUALITY CONTROL PLANS AND SUSTAINABLE GROUNDWATER MANAGEMENT PLANS APPLICABLE TO THE REZONING SITES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Water Quality Control Plan

Development facilitated by the project would affect water quality and groundwater supply through construction and operational activities. The North Coast RWQCB's WQCP applies to Rezoning Sites in Geyserville, Guerneville, Larkfield, Forestville, Graton, and Santa Rosa; while the San Francisco Bay RWQCB's WQCP applies to sites in Glen Ellen, Agua Caliente, Penngrove, Petaluma, and Sonoma. The WQCPs identify beneficial uses for surface water and groundwater and establish water quality objectives to attain those beneficial uses. The identified beneficial uses and the water quality objectives to maintain or achieve those uses are together known as water quality standards. As discussed in detail under Impact HWQ-1, compliance with relevant water quality regulations, BMPs, and policies would reduce the risk of water degradation from soil erosion and other pollutants related to project construction and operational activities. These requirements would ensure that the project does not contribute or exacerbate identified water quality contamination in the applicable WQCP. As such, construction and operation of development facilitated by the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality. Consequently, the project would not conflict with or obstruct implementation of the WQCPs, and impacts would be less than significant.

Sustainable Groundwater Management Plan

The Santa Rosa Plain Groundwater Subbasin is classified by DWR as a medium-priority basin; the Sonoma Valley Groundwater Subbasin is classified by DWR as a high-priority basin, with groundwater levels declining in some areas; and the Petaluma Valley Groundwater Basin is classified by DWR as a medium-priority basin, with groundwater levels declining in some areas (Santa Rosa Plain GSA; Sonoma Valley GSA 2022; Petaluma GSA). Therefore, the GSA for each of these basins adopted individual GSPs in January 2022. The goal of each GSP is to sustainably manage, protect, and enhance groundwater resources in each respective basin while still allowing for managed growth through careful monitoring of groundwater conditions, coordination with other agencies, and implementation of projects and management actions that ensure adequate groundwater supplies for future uses and users (Santa Rosa Plain GSA; Sonoma Valley GSA 2022; Petaluma GSA). As discussed in detail under Impact HWQ-2, compliance with the LID Manual, implementation of permanent stormwater BMPs that encourage groundwater recharge, compliance with General Plan Policy WR-2e, if applicable, and compliance with all applicable policies under General Plan Goal WR-4 would ensure that development facilitated by implementation of the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. Therefore, development facilitated by the project would not interfere with sustainable groundwater management planning efforts. Impacts related to sustainable groundwater management would be less than significant with mitigation.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.11 Land Use and Planning

This section analyzes the consistency of the proposed project with applicable land use plans, policies, and regulations, and identifies environmental effects that would arise from any inconsistencies.

4.11.1 Setting

a Existing Land Uses

The 59 Rezoning Sites are located throughout unincorporated Sonoma County and are subject to County zoning and County General Plan land use designations. Section 2, *Project Description*, Table 2-2 provides the existing zoning and land use designation of each site. Table 4.11-1 and Table 4.11-2 show the total acreages of each existing land use designation and zoning designation, respectively, of the combined Rezoning Sites.

Table 4.11-1 Rezoning Sites Total Acres of Existing Land Use Designations

Land Use Designation	Total Acres
General Industrial (GI)	17.3
Limited Industrial (LI)	25.6
General Commercial (GC)	7.4
Limited Commercial (LC)	8.8
Rural Residential (RR) - 1.5 units per 5 acres	5.3
Rural Residential (RR) - 2 unit per 5 acres	1.1
Rural Residential (RR) - 3 unit per 5 acres	4.0
Urban Residential (UR) - 1 unit per acre	9.9
Urban Residential (UR) - 2 units per acre	40.2
Urban Residential (UR) - 4 units per acre	3.6
Urban Residential (UR) - 4.8 units per acre	4.0
Urban Residential (UR) - 5 units per acre	7.4
Urban Residential (UR) - 9 units per acre	4.8
Combined Districts (LC/RR1.5, LC/UR 11, and LI/RR 3)	15.2

Table 4.11-2 Rezoning Sites Total Acres of Existing Zoning Designations

Zoning Designation	Total Acres
Agricultural and Residential (AR)	5.3
Administrative and Professional Office (CO)	2.4
Neighborhood Commercial (C1)	0.0
Retail Business and Service (C2)	0.2
General Commercial (C3)	1.0
Limited Commercial (LC)	6.4
Industrial Park (MP)	2.9
Limited Urban Industrial (M1)	14.0

Zoning Designation	Total Acres
Heavy Industrial (M2)	8.3
Limited Rural Industrial (M3)	6.6
Planned Community (PC)	6.2
Rural Residential (RR)	57.3
Low Density Residential (R1)	26.4
Medium Density Residential (R2)	4.8
Combined Districts (AR/C1, LC/PC, M1/RR)	22.5

As shown in Table 4.11-1 and Table 4.11-2, the Rezoning Sites have various existing land use and zoning designations, ranging from general and light industrial uses to various densities of residential uses. The most common existing land use designation of the Rezoning Sites is Urban Residential (2 units per acre), and the most common zoning designation is Rural Residential. The zoning of each Rezoning Site and surrounding area is shown on Figure 4.11-1 through Figure 4.11-11. The land use designations typically align with the zoning designation, such that residentially zoned lands are designated for residential land uses, and commercially zoned lands are designated for commercial land uses, for example.

The Rezoning Sites are in or adjacent to already-developed areas in communities of varying size. Most are in small, unincorporated communities. Surrounding land uses vary widely, and include residential development, agricultural land, public utilities infrastructure, commercial development, open space/undeveloped land, religious institutions, educational facilities, and light industrial and warehouse uses. Section 2, *Project Description*, provides additional details related to land use patterns.

Figure 4.11-1 Existing Zoning – Geyserville

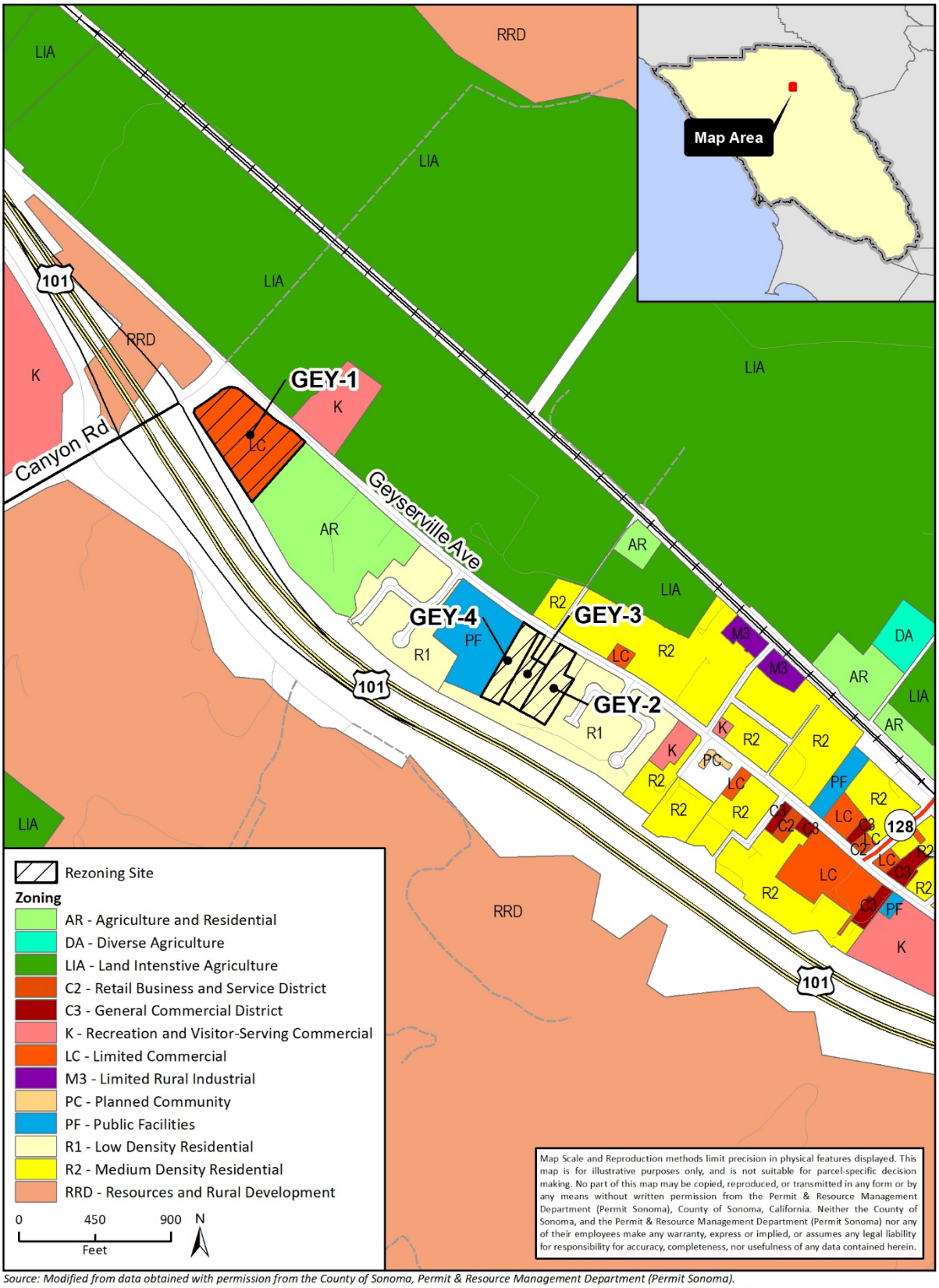

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Figure 4.11-2 Existing Zoning – Guerneville

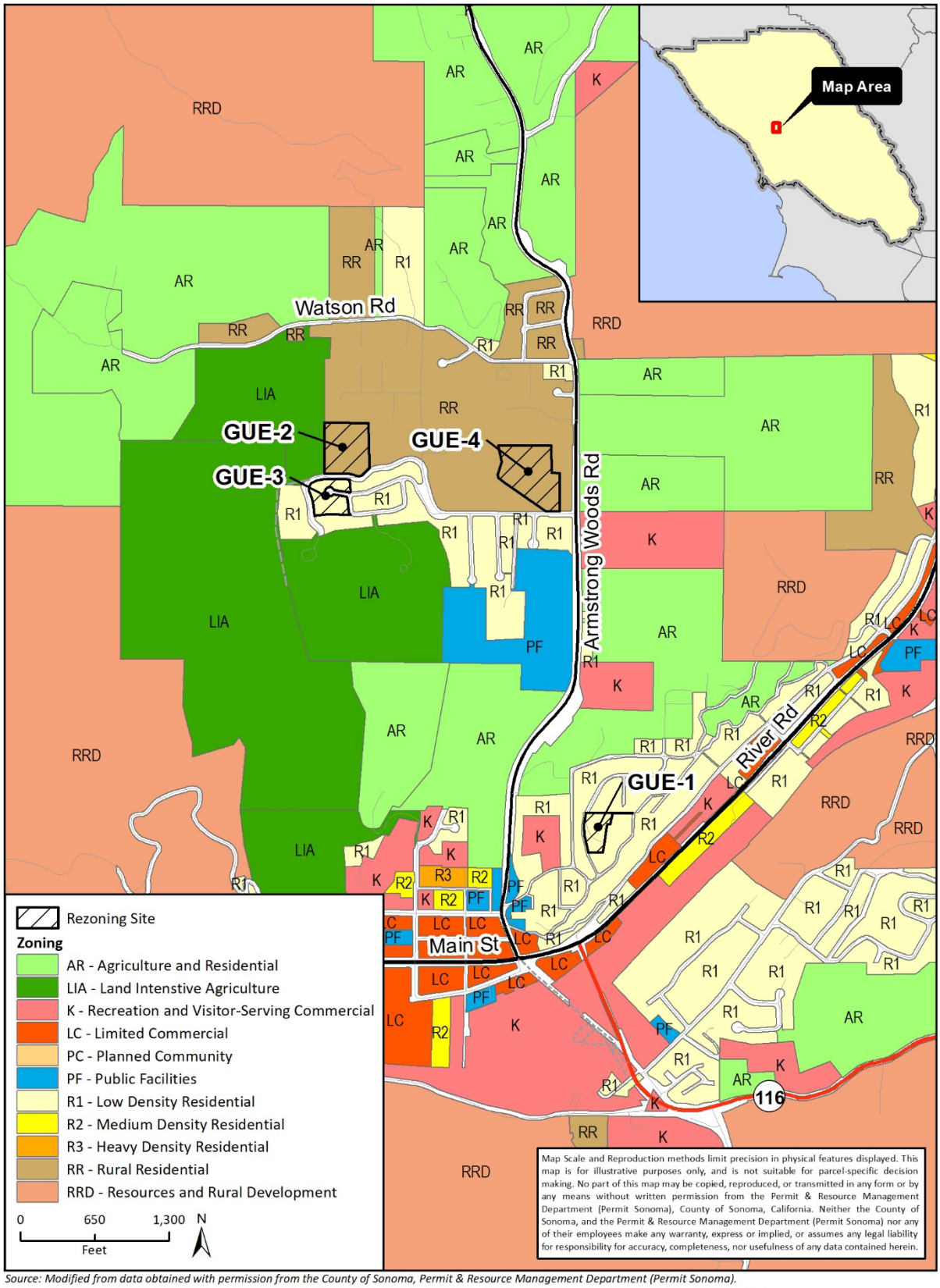

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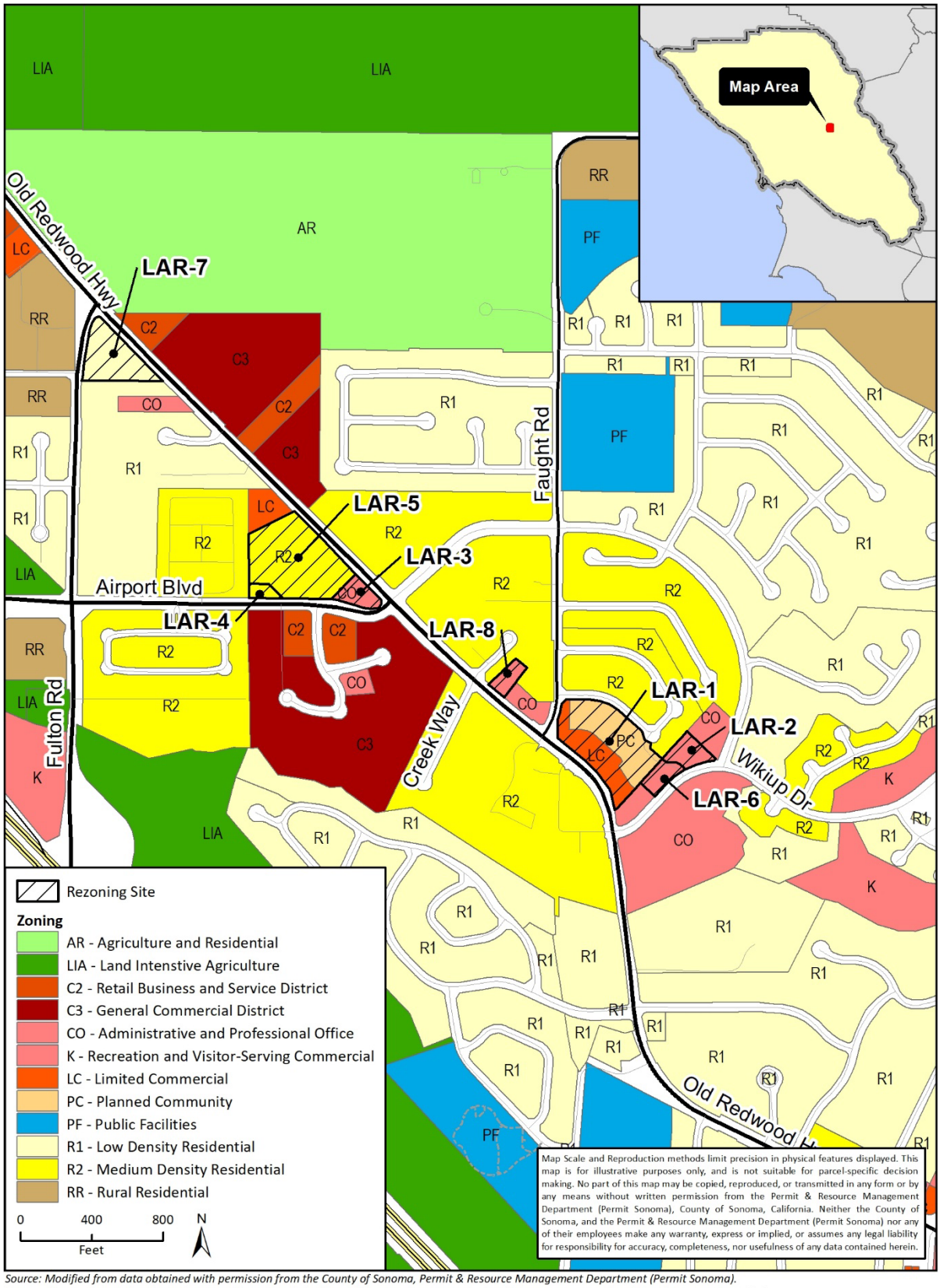
Figure 4.11-3 Existing Zoning – Larkfield



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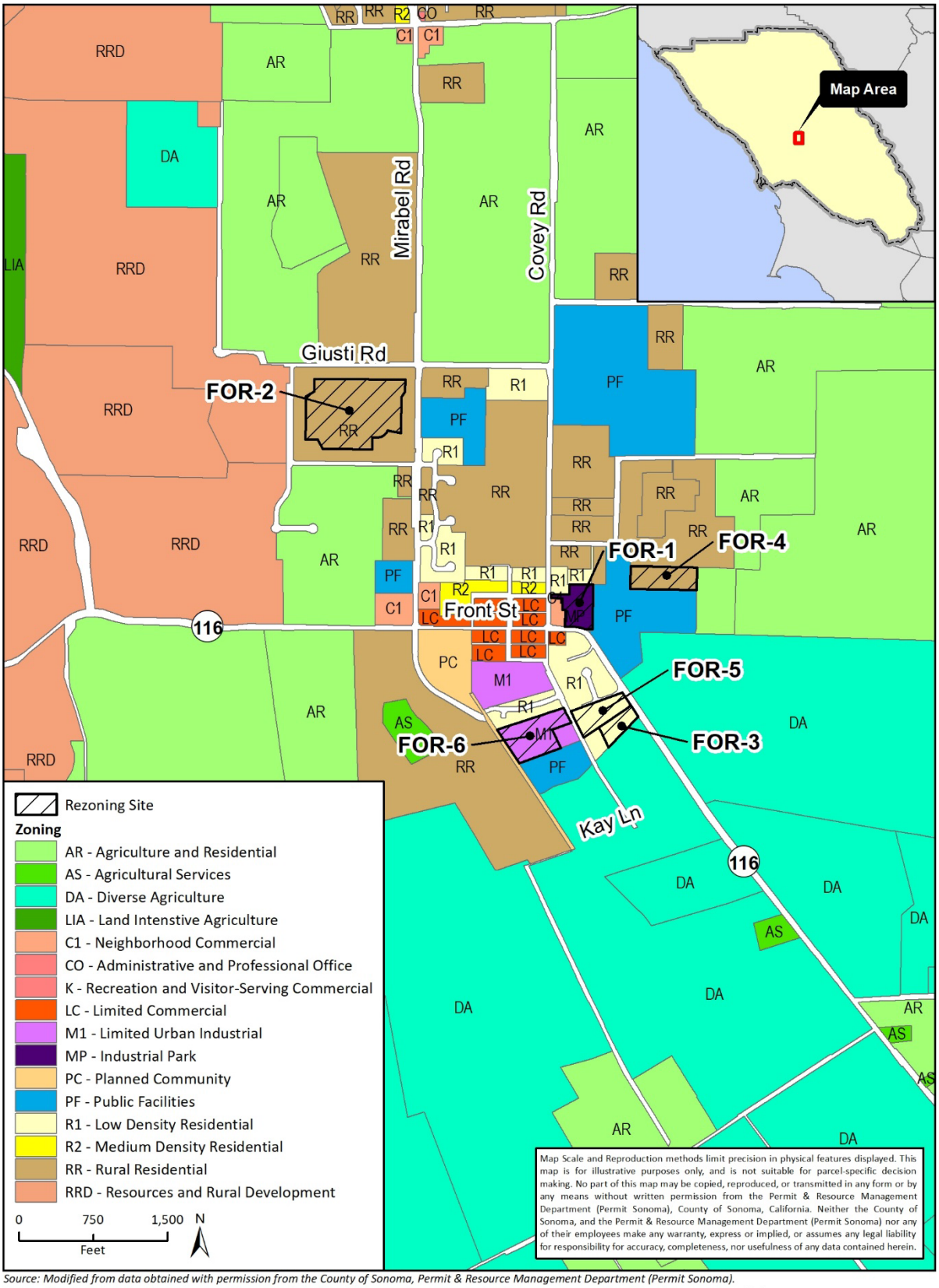
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri.

Figure 4.11-4 Existing Zoning – Forestville



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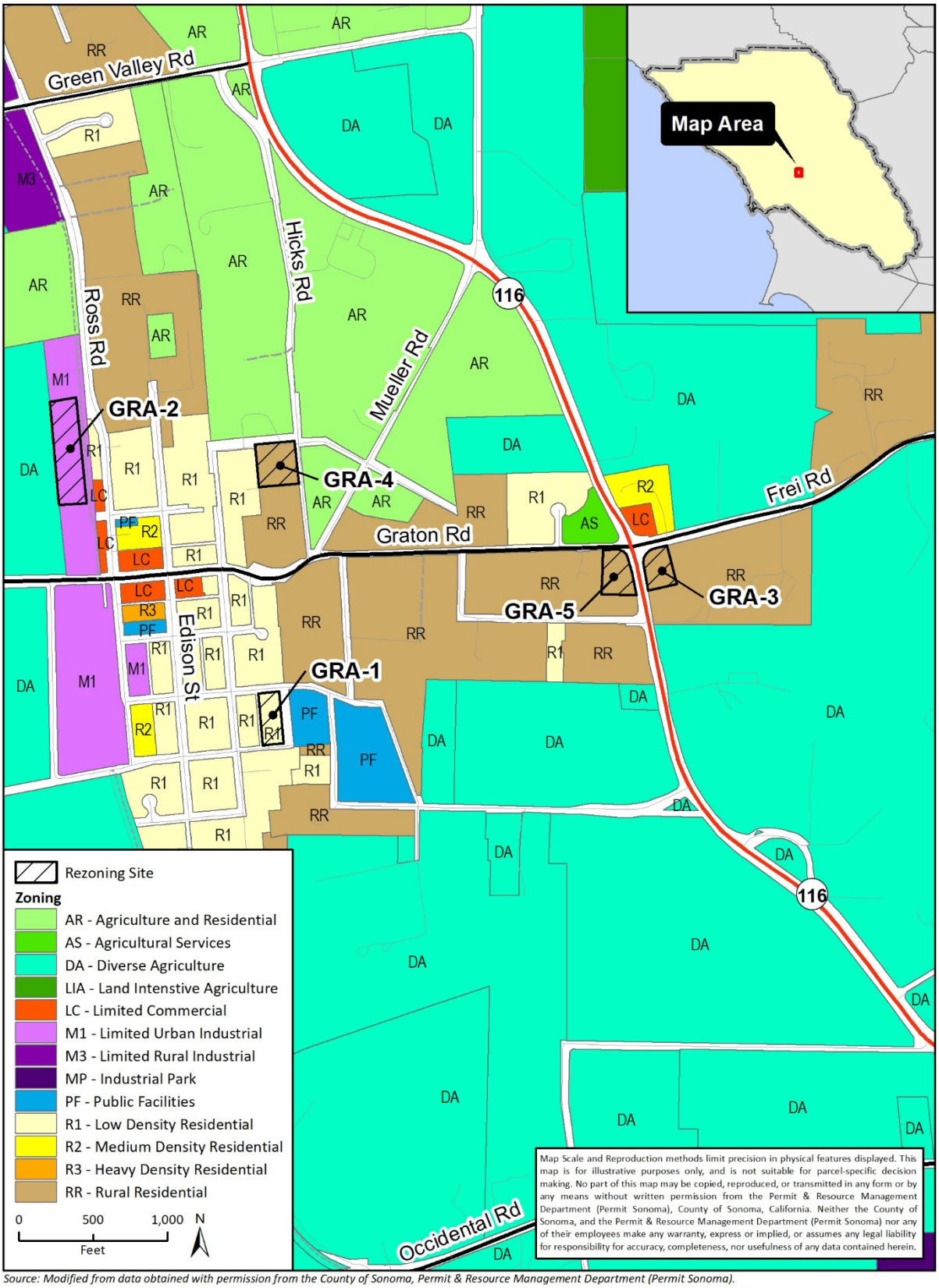
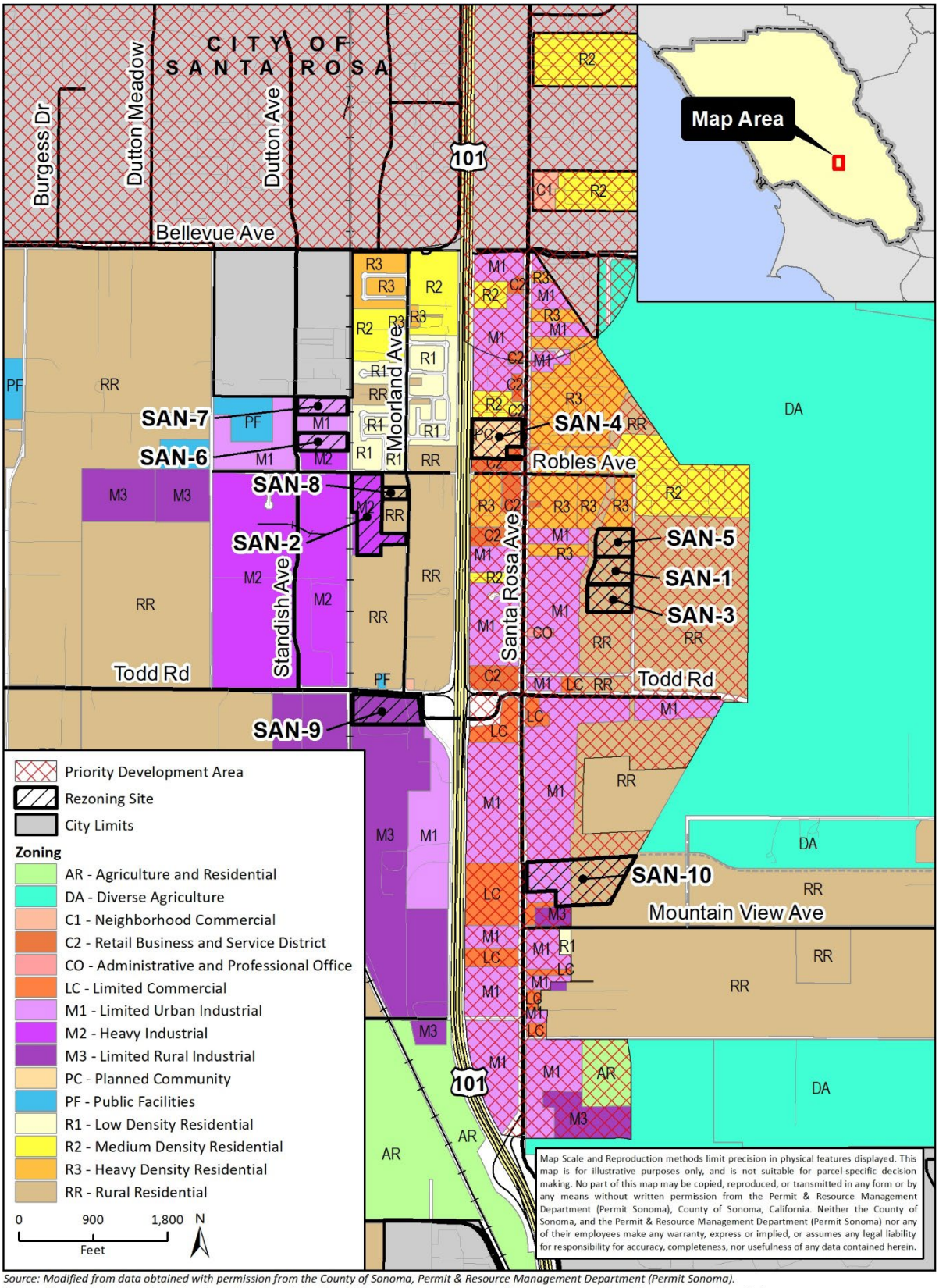
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri.

Figure 4.11-5 Existing Zoning – Graton



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri.

Figure 4.11-6 Existing Zoning – Santa Rosa



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
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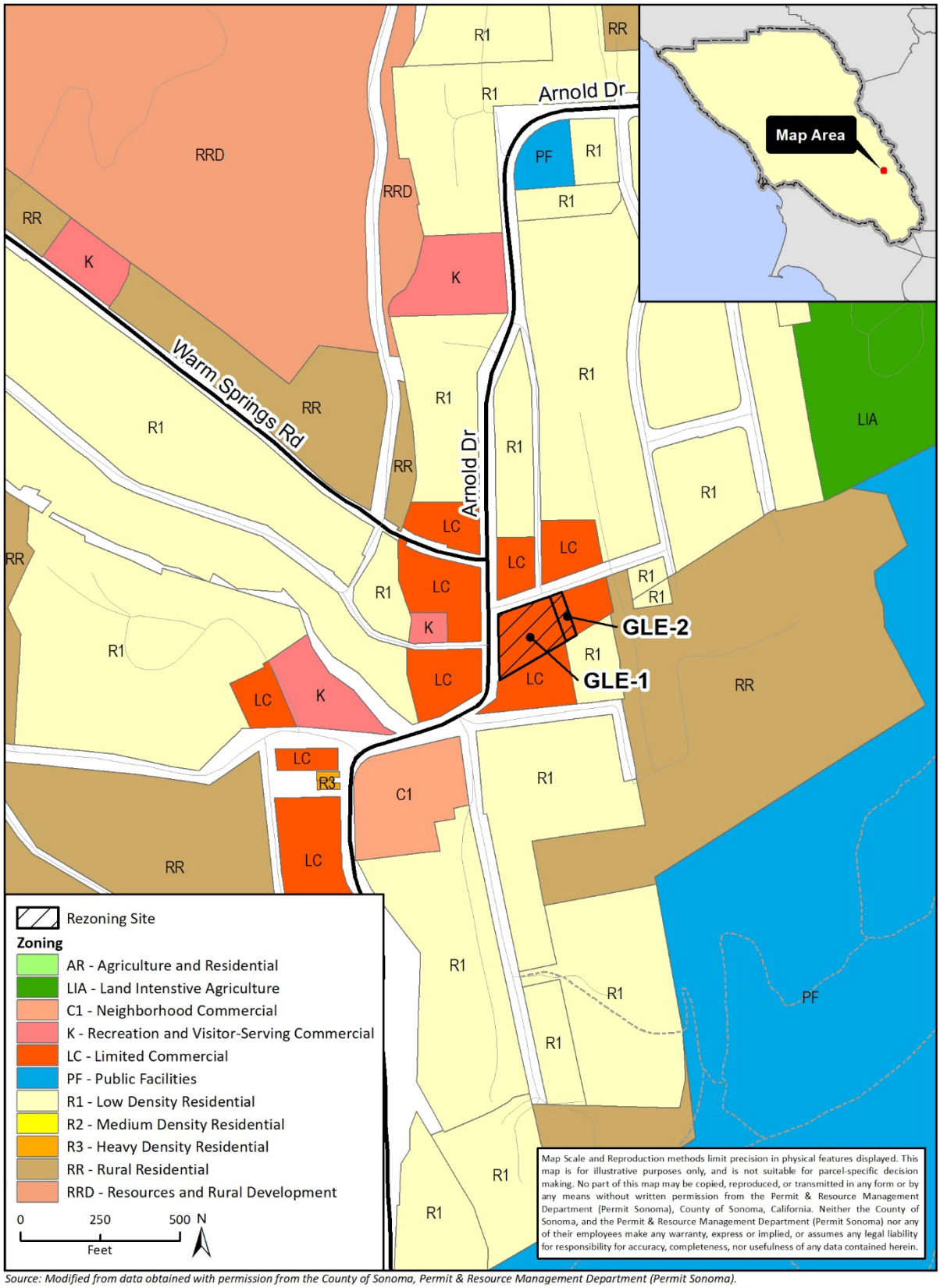
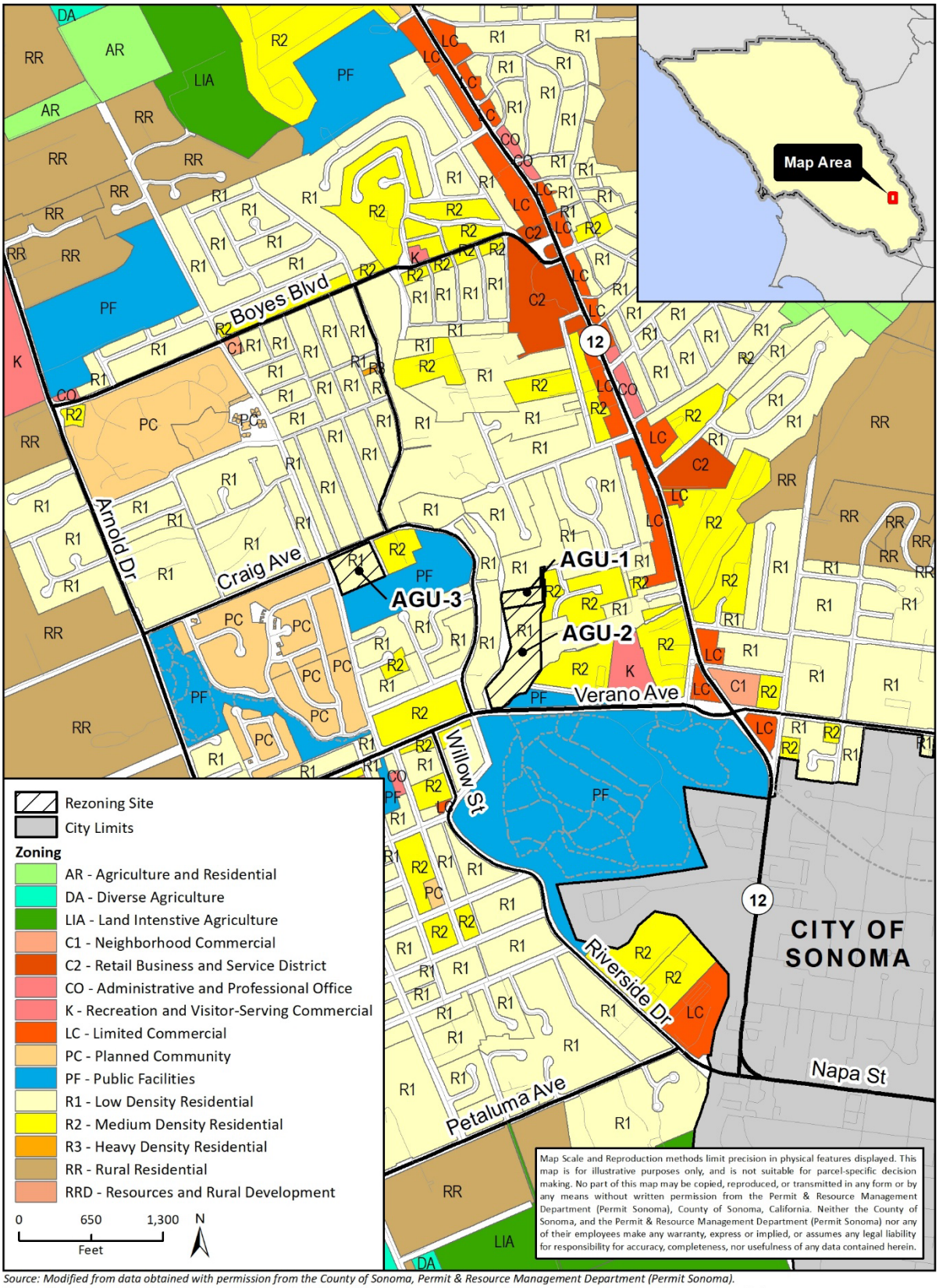
Figure 4.11-7 Existing Zoning – Glen Ellen



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri.

Figure 4.11-8 Existing Zoning – Agua Caliente



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
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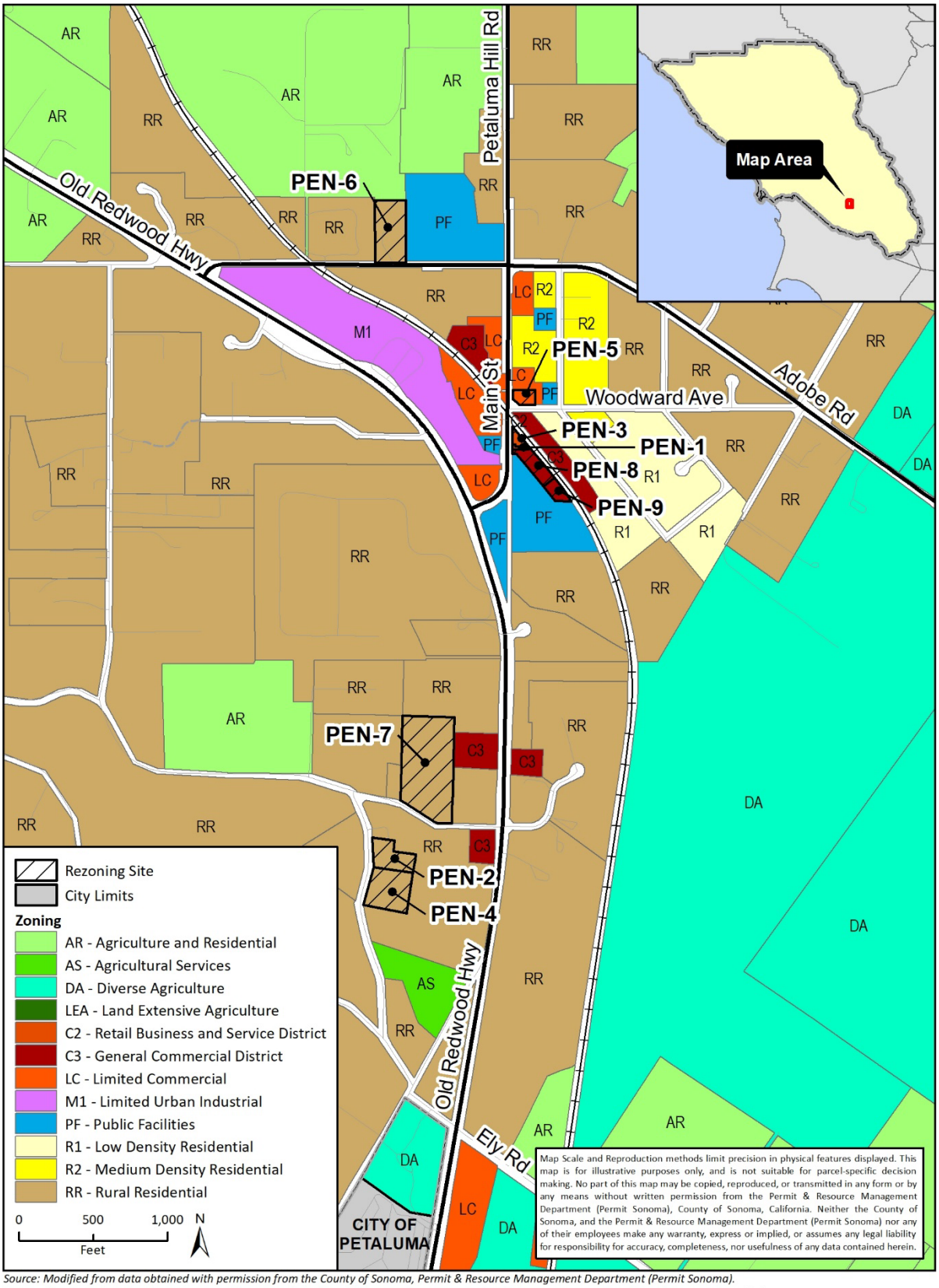
Figure 4.11-9 Existing Zoning – Penngrove



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
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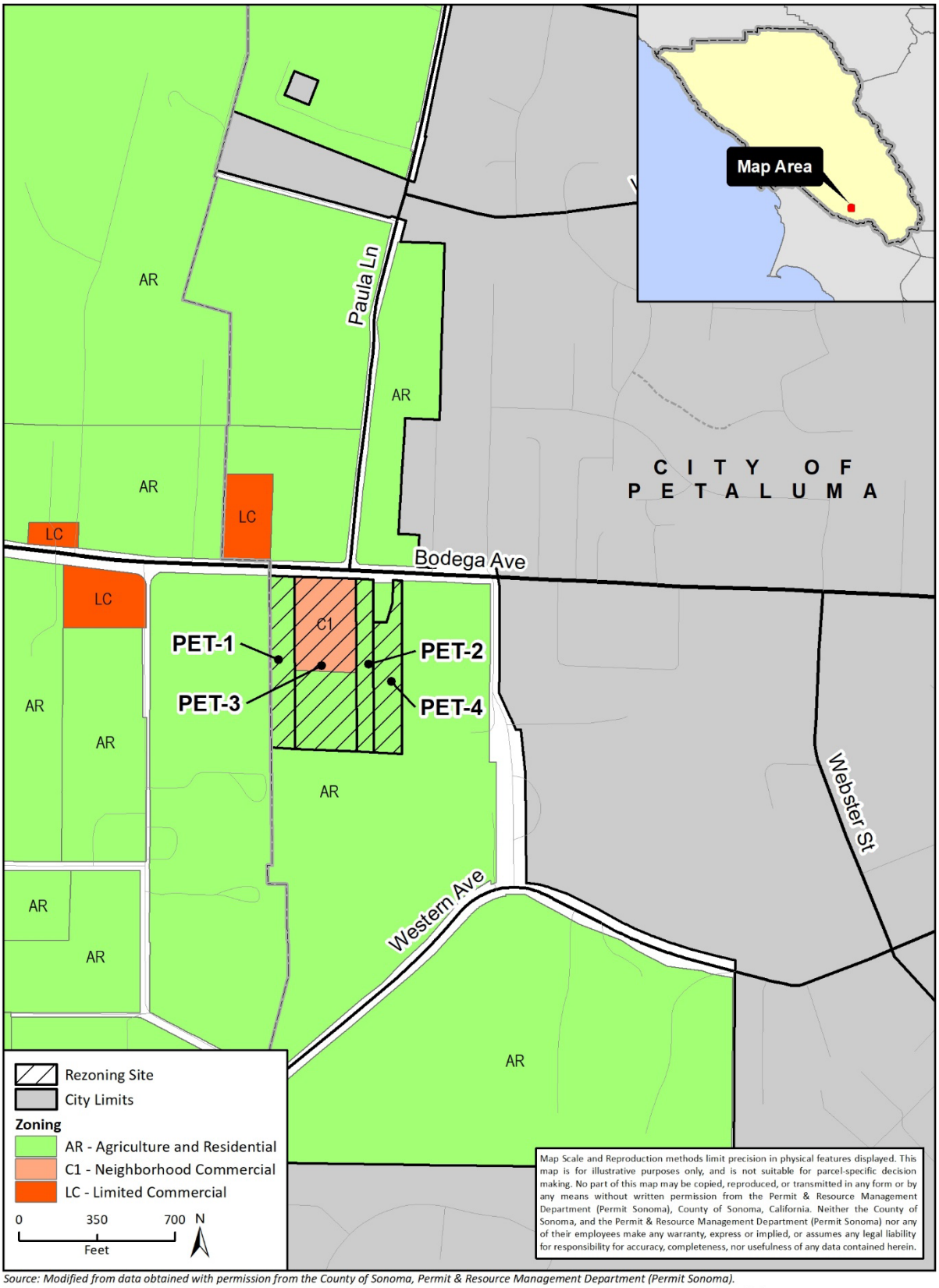
Figure 4.11-10 Existing Zoning – Petaluma



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
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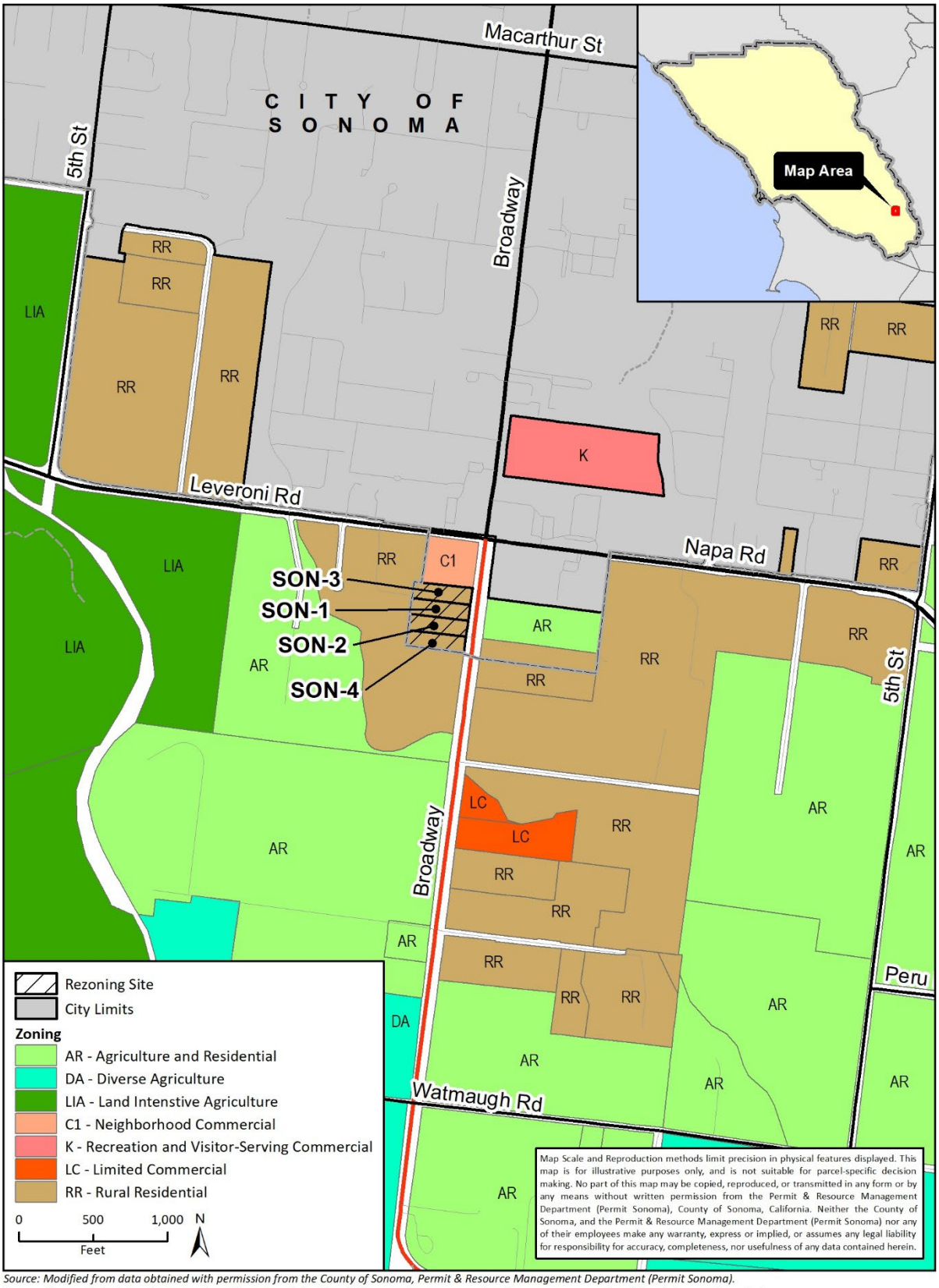
Figure 4.11-11 Existing Zoning – Sonoma



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4.11.2 Regulatory Setting

a. State Regulations

Local Agency Formation Commissions

The Cortese-Knox-Hertzberg Local Government Reorganization Act (Cortese-Knox-Hertzberg Act) of 2000 (Government Code Section 56000 et seq.) establishes the process through which local agency boundaries are established and revised. Each county must have a Local Agency Formation Commission (LAFCO), which is the agency that has the responsibility to create orderly local government boundaries, with the goal of encouraging "planned, well-ordered, efficient urban development patterns," the preservation of open-space lands, and the discouragement of urban sprawl. While LAFCOs have no direct land use power, LAFCOs control boundary changes and their actions determine which local government will be responsible for planning new areas. LAFCOs address a wide range of boundary actions, including the creation and modifications of spheres of influence for cities and special districts, annexations, reorganizations, incorporations, and the detachment of areas from special districts. A city's or special district's sphere of influence is an indication of an agency's future boundaries and service area.

Planning and Zoning Law

State law requires each city and county in California to adopt a general plan for the physical development of the land within its planning area (Government Code Sections 65300-65404). The general plan must contain land use, housing, circulation, open space, conservation, noise, and safety elements, as well as any other elements that the city or county may otherwise be required to, or wish to, adopt. The circulation element of a local general plan must be correlated with the land use element.

Zoning authority originates from city and county police power and from the State's Planning and Zoning Law, which sets minimum requirements for local zoning ordinances. The city or county zoning code is the set of detailed requirements that implement the general plan policies at the level of the individual parcel. The zoning code presents standards for different uses and identifies which uses are allowed in the various zoning districts of the jurisdiction. Since 1971, State law has required the city or county zoning code to be consistent with the jurisdiction's general plan.

Sustainable Communities and Climate Protection Act (SB 375)

The Sustainable Communities and Climate Protection Act (SB 375) supports the State's climate goals by helping reduce greenhouse gas emissions through coordinated transportation, housing, and land use planning. Under the Act, the California Air Resources Board (CARB) set targets for 2020 and 2035 for each of the 18 metropolitan planning organization regions in 2010 and updated them in 2018. Each of the regions must prepare a Sustainable Communities Strategy (SCS), as an integral part of its regional transportation plan, that contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet CARB's targets. The Act establishes some incentives to encourage implementation of the development patterns and strategies included in an SCS. Developers can get relief from certain environmental review requirements under the California Environmental Quality Act (CEQA) if their new residential and mixed-use projects are consistent with a region's SCS that meets the CARB targets (see Public Resources Code Sections 21155, 21155.1, 21155.2, 21159.28.).

b. Regional Regulations

Association of Bay Area Governments (ABAG)/Metropolitan Transportation Commission (MTC) Plan Bay Area 2050, adopted in October 2021, is a long-range, integrated transportation and land-use plan for the nine-county San Francisco Bay Area. The Plan is the combined Sustainable Communities Strategy and Regional Transportation Plan (also referred to as the RTP/SCS) that describes where and how the region can accommodate the projected 1.4 million new households and 5.4 million new jobs between 2015 and 2050. The Plan also details the regional transportation investment strategy over the next 28 years. Growth in the plan area is promoted in Priority Development Areas and limited in Priority Conservation Areas to promote preservation of key resources. The Plan contains one main vision that is driven by five guiding principles focused on affordability, connectedness, diversity, physical health, and community vibrancy (ABAG 2021).

c. Local Regulations

Sonoma County General Plan

The current County General Plan was adopted by the Sonoma County Board of Supervisors Resolution 08-0808 on September 23, 2008. The County General Plan includes broad goals and policies aimed at promoting a mix of land uses and a balance of jobs; encouraging development that helps the County achieve a target jobs/housing ratio; encouraging regional commercial and visitor-serving commercial development that would enhance the identity of the County and attract visitors; providing for a variety of housing that complements the employment opportunities in the community; and encouraging consolidation of under-performing and under-utilized properties. Goals and policies from the County General Plan are provided below.

The General Plan designates Urban Service Areas within the County, which include the geographical area within the Urban Service Boundary that is designated for urban development (refer to Figures LU-2a through LU-2i of the Land Use Element). Urban Service Boundaries are the designated limit to the urban development of the cities and unincorporated communities of the County. Urban Growth Boundaries (UGB) provide the voter-designated limit to the urban development of a city.

LAND USE ELEMENT

Land Use Element goals and policies aim to accommodate future growth in the region, provide employment opportunities, emphasize development in Urban Service Areas, provide sufficient higher density housing opportunities, encourage infill development, maintain adequate public services, reduce exposure to unnecessary hazards, protect agricultural production lands, and coordinate with cities when applicable. Housing Element goals and policies promote affordable housing programs and construction, and ensure adequate public services are available to serve new development. Applicable goals and policies are reproduced as part of the Impact LU-2 discussion below.

Goal LU-1: Accommodate Sonoma County's fair share of future growth in the San Francisco Bay Area region as shown on Tables LU-2 and LU-5 in a manner consistent with environmental constraints, maintenance of the high quality of life enjoyed by existing residents, and the capacities of public facilities and services. Achieve a desirable balance between job opportunities and population growth.

Objective LU-1.1: Correlate development authorized by the Land Use Plan with projected population and employment growth as shown on Tables LU-2 and LU-5. Provide an adequate

but not excessive supply of residential, commercial and industrial lands to accommodate this projected growth, taking into account projected city annexations.

Objective LU-1.3: Designate lands within the various land use categories to make available residential and employment opportunities and to achieve a balance between job opportunities and population growth countywide, subject to any constraints of environmental suitability, protection of agriculture and other resource protection, and availability of public services.

Policy LU-1a: This plan has relied extensively upon policies and designations set forth in previous Specific Plans and Area Plans. The County shall continue to use the following selected Specific Plans and Area Plans to implement this plan. A Specific or Area Plan may establish more detailed policies affecting proposed development but may not include policies that are in conflict with the General Plan. In any case where there appears to be a conflict between the General Plan and any Specific or Area Plan, the more restrictive policy or standard shall apply.

(1) Airport/Industrial Specific Plan
(2) South Santa Rosa Area Plan
(3) Bennett Valley Area Plan
(4) Sonoma Mountain Area Plan
(5) West Petaluma Area Plan
(6) Petaluma Dairy Belt Area Plan
(7) Penngrove Area Plan
(8) Franz Valley Area Plan

The following plans shall be repealed, but development guidelines contained therein shall be reviewed and updated and considered for adoption as "Local Area Development Guidelines," provided that they are consistent with the General Plan. Until such a time that these guidelines are adopted, any policies contained in these plans shall continue to apply provided they are consistent with the General Plan:

(1) North Santa Rosa Plan
(2) West Santa Rosa Plan
(3) North Sonoma Valley Plan
(4) South Sonoma Areas I and II
(5) Lower River Plan
(6) Hessel Plan
(7) Russian River Plan
(8) West Sebastopol Plan

The Sonoma County Local Coastal Plan is the policy document that guides land use and development in the Coastal Zone. The Local Coastal Plan is intended to be a standalone policy document that integrates the appropriate General Plan goals, objectives, and policies with those necessary to comply with the California Coastal Act.

Policy LU-1h: Evaluate Land Use Plan amendments subject to:

(1) constraints of environmental suitability,
(2) protection of agriculture,

(3) availability of public services,

(4) the County-projected population and employment levels,

(5) the need for workforce housing, and

(6) other plan goals, objectives, and policies.

Goal LU-2: Accommodate the major share of future growth within the nine existing cities and their expansion areas and within selected unincorporated communities, which are planned to have adequate water and sewer capacities.

Objective LU-2.2: Allocate the largest portion of unincorporated area growth to communities with public sewer and water services.

Objective LU-2.3: Limit the amount of population growth and development in rural portions of the County outside of the cities and the unincorporated communities.

Objective LU-2.4: Coordinate with the cities and neighboring counties to maximize cooperative planning and implementation of the General Plan.

Objective LU-2.5: Provide sufficient opportunities for higher density housing within the Urban Service Areas to accommodate the population growth quantified in the Housing Element Objectives for lower and moderate income units.

Policy LU-2a: Maintain a residential holding capacity that is as close as possible to projected growth. Consider denial of Land Use Map amendments that add residential density in rural areas if residential holding capacity exceeds projected growth, recognizing that future development may not always use 100% of the capacity of all parcels.

Policy LU-2c: Encourage the retention and production of diverse types of housing within Urban Service Areas in order to provide adequate housing choices for current and future residents.

Policy LU-2d: Inventory, conserve and increase the amount and type of housing that accommodates those with special housing needs. Populations needing special types of housing include farm employees, the terminally ill, mentally disabled, handicapped people, abused spouses and children, and the homeless.

Goal LU-3: Locate future growth within the cities and unincorporated Urban Service Areas in a compact manner using vacant "infill" parcels and lands next to existing development at the edge of these areas.

Objective LU-3.2: Provide enough land for the expansion of cities and unincorporated Urban Service Areas to accommodate, but not substantially exceed, the projected urban growth. Lands planned for urban development in each planning area are shown on the Land Use Maps.

Objective LU-3.3: Encourage "infill" development within the expansion areas of the cities and unincorporated communities.

Policy LU-3b**:** In designated Urban Service Areas, maintain a residential holding capacity that is as close as possible to projected growth. Consider denial of Land Use Map amendments that add residential density if residential holding capacity exceeds projected growth, recognizing that future development may not use 100% of the capacity of all parcels.

Policy LU-3c: Avoid urban sprawl by limiting extension of sewer or water services outside of designated Urban Service Areas pursuant to the policies of the Public Facilities and Services Element.

Policy LU-3e: Until December 31, 2036, the boundaries of Urban Service Areas of unincorporated communities as shown on the Land Use Maps shall not be amended to include lands within Community Separators as shown on the Open Space Maps unless such amendment is approved by the voters of Sonoma County.

For the purposes of this policy, approval by the voters of Sonoma County shall be accomplished when a general plan amendment is placed on the ballot through any procedure provided for in the Elections Code, and a majority of the voters vote in favor of it. The Board of Supervisors may adopt the general plan amendment prior to securing the approval of the voters of Sonoma County; provided, however, that whenever the Board of Supervisors adopts an amendment requiring approval of the voters of Sonoma County pursuant to the provisions of this policy, the Board action shall have no effect until after such a vote is held and a majority of the voters vote in favor of it. The Board of Supervisors shall follow the provisions of the Elections Code in all manners pertaining to such an election.

Goal LU-4: Maintain adequate public services in both rural and Urban Service Areas to accommodate projected growth. Authorize additional development only when it is clear that a funding plan or mechanism is in place to provide needed services in a timely manner.

Objective LU-4.1: Assure that development occurs only where physical public services and infrastructure, including school and park facilities, public safety, access and response times, water and wastewater management systems, drainage, and roads are planned to be available in time to serve the projected development.

Policy LU-4a: If necessary, use zoning to assure that development shall occur only if public services are adequate or improvements are made to maintain an acceptable level of service. One such method could involve the use of "dual zoning" which would specify zoning with services and zoning without services.

GOAL LU-5: Identify important open space areas between and around the County's cities and communities. Maintain them in a largely open or natural character with low intensities of development.

Objective LU-5.1: Retain low intensities of use in Community Separators between and around cities and communities as designated in the Open Space and Resource Conservation Element.

Policy LU-5e: Avoid amendments to increase residential density in Community Separators, since these densities were established based upon the policies set forth in other elements of this plan as well as the open space, separation, and visual considerations identified in this section. The integrity of Community Separators cannot be maintained at densities in excess of one unit per ten acres. However, under no circumstances shall this policy be used to justify an increase in density from that designated on the Land Use Map.

Goal LU-6: Diversify new residential development types and densities. Include a range of urban densities and housing types in some unincorporated communities, and lower density in rural communities. In rural areas, housing types and densities should meet the needs of agricultural and resource users and provide limited residential development on large parcels.

Objective LU-6.1: Provide opportunities for a range of urban housing types and densities in unincorporated communities, while retaining the character of these communities.

Objective LU-6.2: Limit residential density to a maximum of one dwelling per acre in unincorporated communities with public water but without sewer systems.

Objective LU-6.6: Encourage the development of adequate housing for farm workers and farm family members.

Policy LU-6b: Site specific environmental factors shall be considered in making decisions on development permits. Site specific factors which create health or safety problems or result in unmitigated significant environmental impacts may at times reduce densities that are allowed by the Land Use Map and zoning.

Policy LU-6i: Provide expanded opportunities for a mix of residential and commercial or industrial use in Urban Service Areas.

Goal LU-7: Prevent unnecessary exposure of people and property to environmental risks and hazards. Limit development on lands that are especially vulnerable or sensitive to environmental damage.

Objective LU-7.1: Restrict development in areas that are constrained by the natural limitations of the land, including but not limited to, flood, fire, geologic hazards, groundwater availability and septic suitability.

Policy LU-7a: Avoid General Plan amendments that would allow additional development in flood plains, unless such development is of low intensity and does not include large permanent structures.

Policy LU-7b: Limit development in wetlands designated on Figure OSRC-3 of the Open Space and Resource Conservation Element.

Policy LU-7c: Prohibit new permanent structures within any floodway. Require that any development that may be permitted within the flood plain to be raised above the 100-year flood elevation.

Policy LU-7d: Avoid new commercial, industrial, and residential land use designations in areas subject to "high" or "very high" fire hazards, as identified in the Public Safety Element, unless the combination of fuel load, access, water supply, and other project design measures will reduce the potential fire related impacts of new development to insignificant levels.

Goal LU-9: Protect lands currently in agricultural production and lands with soils and other characteristics that make them potentially suitable for agricultural use. Retain large parcel sizes and avoid incompatible non-agricultural uses.

Objective LU-9.1: Avoid conversion of lands currently used for agricultural production to non-agricultural use.

Objective LU-9.2: Retain large parcels in agricultural production areas and avoid new parcels less than 20 acres in the "Land Intensive Agriculture" category.

Objective LU-9.3: Agricultural lands not currently used for farming but which have soils or other characteristics that make them suitable for farming shall not be developed in a way that would preclude future agricultural use.

Objective LU-9.4: Discourage uses in agricultural areas that are not compatible with long term agricultural production.

Policy LU-9c: Use rezonings, easements and other methods to ensure that development on agricultural lands does not exceed the permitted density except where allowed by the policies of the Agricultural Resources Element.

Objective LU-19.1: Avoid extension of Petaluma's Urban Service Boundary and limit urban residential development to the Urban Service Area when annexed by the City.

Policy LU-19a: Use zoning to avoid new urban uses within the Petaluma Urban Service Area prior to annexation by Petaluma.

Policy LU-19b: Refer to the City of Petaluma for review and comment any application for discretionary projects within one mile of the Urban Service Boundary.

Objective LU-20.1: Seek to jointly coordinate and monitor development within the City of Sonoma and the unincorporated Urban Service Area. Discourage urban development within Sonoma's Urban Service Boundary until annexation by the city (excluding parcels within the Sonoma Valley Redevelopment Area).

Policy LU-20a: Avoid urban residential and commercial development within Sonoma's Urban Growth Boundary until annexed by the City.

Policy LU-20b: In general, encourage annexation by the city prior to urban development on parcels that are within the Sonoma Valley Sanitation District and within the city's primary Sphere of Influence. Require annexation for urban residential development in this area. Parcels within the Sonoma Valley Redevelopment Area are exempt from these policies.

Policy LU-20c: Establish procedures for joint City/County review of major projects within the City and the County. Continue to utilize the Sonoma Valley Citizen's Advisory Commission as an advisory body to the two jurisdictions for this purpose.

Policy LU-20gg: Land use for the Glen Ellen area, including residential densities, shall correspond with the General Plan Land Use Element for Sonoma Valley. New development in Glen Ellen shall be evaluated in the context of the following:

(1) the relationship between growth and traffic congestion,
(2) the boundaries and extent of Urban Service Areas,
(3) the amount and location of recreation and visitor-serving commercial uses,
(4) the need to upgrade existing structures and public infrastructure, and
(5) the compatibility of rural development with protection of agriculture, scenic landscapes, and resources.

Policy LU-20hh: All new development in the Glen Ellen area (as designated in the Glen Ellen Development and Design Guidelines) shall comply with the Glen Ellen Development and Design Guidelines, which are part of the County Development Code.

HOUSING ELEMENT GOALS AND POLICIES

Goal 1: Sustain Existing Affordable Housing Programs and Affordable Units

Objective HE-1.1: Continue existing County and Community Development Commission efforts and programs with the objective of producing at least 507 new affordable units [110 extremely low; 110 very low; 127 low; and 160 moderate income units] between 2015and 2023.

Objective HE-1.4: Retain existing rental units to serve lower-income and special needs households, including seniors, farmworkers and their families, single-parent households, transitional and supportive housing, residential care facilities and group homes.

Objective HE-1.5: Limit the loss of existing housing stock to visitor-serving uses.

Objective HE-1.6: Retain existing affordable housing stock located in mobile home parks.

Goal 2: Promote the Use of Available Sites for Affordable Housing Construction and Provide Adequate Infrastructure

Objective HE-2.1: Assist developers and other interested parties in locating available sites and accessing programs for the development of affordable housing, especially rental housing.

Objective HE-2.3: Enhance opportunities for affordable housing production on all appropriate sites with adequate infrastructure and proximity to services.

Policy HE-2a: Publish a popular summary that identifies available housing opportunity sites in the Unincorporated County. Provide site-specific development information and support for development proposals whenever possible in order to reduce up-front costs for interested housing developers.

Policy HE-2f: Consider a variety of sites for higher-density and affordable housing when the following criteria are met: site is located within or adjacent to an Urban Service Area (USA); adequate utilities are available; site is located within 1/2 mile to goods, services and transit; and project is consistent with the land use policies of the General Plan.

Goal 3: Promote Production of Affordable Housing Units

Objective HE-3.1: Eliminate unneeded regulatory constraints to the production of affordable housing.

Objective HE-3.2: Review and revise housing programs to address changing needs, including needs that may not be met by traditional housing units. Consider the use of new community housing models and innovative types of structures and building materials to meet a wide variety of housing needs while protecting the public health and safety.

Objective HE-3.3: Increase opportunities for the production of affordable housing.

Policy HE-3i: Promote the construction and retention of shared housing such as group homes, congregate care facilities and residential community care facilities while ensuring the health and safety of residents and ensuring land use compatibility for neighbors.

Policy HE-3j: Continue to encourage affordable "infill" projects on underutilized sites within Urban Service Areas by allowing flexibility in development standards pursuant to state density bonus law (Government Code 65915).

Goal 5: Promote Production of Housing Units for Special Needs

Objective HE-5.4: Promote Fair Housing**.**

Objective HE-5.6: Increase the supply of housing for farmworkers and other migrant workers.

Policy HE-5k: Encourage construction of new housing for occupancy by:

1) farmworkers and their families;
2) year-round housing for unaccompanied farmworkers and other migrant workers; and
3) seasonal housing for unaccompanied farmworkers.

Policy HE-5n: Housing intended for occupancy by farmworkers should be permitted in rural locations which are accessible to agricultural lands, pursuant to the farmworker housing ordinance (“bunkhouse ordinance”). Where feasible and close to services, allow more bunks and longer periods of farmworker housing occupancy in order to address the non-farm migrant worker housing need in the off-season.

CIRCULATION AND TRANSIT ELEMENT

The Circulation and Transit Element of the Sonoma County General Plan (2016) contains the following objectives and policies relevant to the proposed project:

Objective CT-1.2: Supplement the Highway 101 and SMART rail corridors with improvements designed to provide east/west access to these corridors.

Objective CT-1.5: Reduce greenhouse gas emissions by minimizing future increase in VMT [vehicle miles traveled], with an emphasis on shifting short trips by automobile to walking and bicycling trips.

Objective CT-1.6: Require that circulation and transit system improvements be done in a manner that, to the extent practical, is consistent with community and rural character. Minimizes disturbance of the natural environment, minimizes air and noise pollution, and helps reduce greenhouse gas emissions.

Objective CT-1.7: Reduce travel demand countywide by striving to provide a jobs/housing balance of approximately 1.5 jobs per household and encourage creation of jobs and housing in urbanized areas along the SMART passenger rail corridor and other transit centers.

Objective CT-1.8: Improve demand for transit by development of a growth management strategy encouraging projects in urbanized areas that decrease distance between jobs and housing, increase the stock of affordable housing, and increase density.

Policy CT-1b: Focus commute and through traffic onto Highway 101. Designate major arterial routes to serve primarily as connectors between urban areas.

Policy CT-1c: Work with the Cities to provide locations for jobs, housing, shopping, and coordination of location of transit along the Highway 101 corridor to reduce the volume of traffic on east/west corridors.

Policy CT-1d: Work with the Cities to provide jobs, housing, shopping, and coordination of local transit along the SMART passenger rail corridor to reduce the need for automobile travel to and from work and shopping centers.

Policy CT-1e: Support development, implementation, and operation of a passenger rail system and contiguous north south pedestrian and bicycle path along the SMART passenger rail corridor including the funding necessary to support a multi-modal feeder system.

Policy CT-1k: Encourage development that reduces VMT, decreases distances between jobs and housing, reduces traffic impacts, and improves housing affordability.

Policy CT-2f: Require discretionary development projects to provide bicycle and pedestrian improvements and gap closures necessary for safe and convenient bicycle and pedestrian travel between the project and the public transit system.

Policy CT-2v: Require discretionary development projects, where nexus is identified, to provide crossing enhancements at bus stops, recognizing that many transit riders have to cross the street on one of the two-way commutes.

Policy CT-2w: Increase the convenience and comfort of transit riders by providing more amenities at bus stops, including adequately-sized all-weather surfaces for waiting, shelters, trash cans, bike racks, and pedestrian-sized lighting. Required that these improvements be provided as part of nearby public or private development projects.

Policy CT-3c: The Sonoma County Bicycle and Pedestrian Advisory Committee (BPAC) shall be responsible for advising the Board of Supervisors, Planning Commission, Board of Zoning

Adjustments, Project Review Advisory Committee, and County staff on the ongoing planning and coordination of the County's bicycle and pedestrian transportation network.

Policy CT-3d: The Regional Parks Department shall be responsible for establishing and maintaining Class I bikeways, and the Department of Transportation and Public Works (TPW) shall be responsible for establishing and maintaining Class II and III bikeways and pedestrian facilities along public rights-of-way in unincorporated areas.

Policy CT-3v: Where nexus exists, require private or public development to plan, design, and construct bicycle and pedestrian facilities to integrate with the existing and planned bicycle and pedestrian network.

Policy CT-3oo: Require new development in Urban Service Areas and unincorporated communities to provide safe, continuous, and convenient pedestrian access to jobs, shopping and other local services and destinations. Maintain consistency with City standards for pedestrian facilities in Urban Service Areas that are within a City's Sphere of Influence or Urban Growth Boundary.

Policy CT-3pp**:** Require pedestrian-oriented street design in Urban Service Areas and unincorporated communities.

South Santa Rosa Area Plan

The South Santa Rosa Area Plan was adopted in May 1982 and most recently amended in September 2008. The plan was prepared pursuant to General Plan Policy LU-1a (described above). The Plan Area encompasses 18,000 acres between the cities of Santa Rosa and Rohnert Park, including all Santa Rosa Rezoning Sites. The following goals and policies would be applicable to development within the Plan Area:

Community Form Goal 1: Accommodate urban and rural life styles in the area, following a community centered growth concept with provision of greenbelts surrounding and separating urban areas, and retaining agricultural and natural resources.

Policy 1: Preserve the identities of the present communities of Santa Rosa, Rohnert Park and Sebastopol.

Policy 2: Promote compactness of the Santa Rosa City urban boundary in order to provide urban level public services efficiently.

Community Form Goal 2: Promote community-centered growth by providing a setting of outstanding quality in the designated urban area of Santa Rosa.

Policy 1: Continue cooperation between the City Government and the County Government including the City/County Joint Design Review Committee in order to achieve consistent high quality urban development and land use policies within the Santa Rosa urban expansion area.

Housing Goal 1: Provide for an adequate mix of residential opportunities as to both cost and type.

Policy 1: Establish land use designations and inclusionary zoning, which promote housing opportunities in areas where compatible with surrounding land use, and where transportation system and public services exist.

Policy 2: Establish land use designations and zoning which allow mobile home subdivisions in areas where compatible with surrounding land uses, and where transportation system, and public service exist.

Penngrove Area Plan

The Penngrove Area Plan was adopted in April 1984 and most recently amended in September 2008. The plan was prepared pursuant to General Plan Policy LU-1a (described above). The Plan Area encompasses the unincorporated community of Penngrove between the cities of Rohnert Park and Petaluma, including all Penngrove Rezoning Sites. The following goals and policies would be applicable to development within the Plan Area:

Community Form Goal: It shall be a goal of this Area Plan that Penngrove retain its village character, but provide for housing and commercial needs in a manner consistent with neighborhood scale.

Policy 1: Establish mechanisms to phase in growth in accordance with the ability of agencies to provide public services.

Policy 2: Encourage a community concept through paths and bikeways connecting residential developments and public facilities.

Policy 3: Establish greenbelts to provide separation from adjacent cities.

Policy 4: Support a development pattern which enforces a sense of community by placing higher densities in the core area and increasingly lower densities on the outlying area.

Policy 5: Discourage "strip" commercial development along Old Redwood Highway.

Policy 6: Require architectural and site design review of buildings and landscaping plans for all new commercial construction, expansion or remodeling.

Rural Residential Goal: A goal of this Area Plan is to accommodate a variety of rural lifestyles in the Penngrove community and its environs.

Policy 1: Conform to the General Plan population projections and land-use designations in providing the opportunity for rural residential development.

Policy 2: Affirm that rural living at a variety of densities is a viable alternative between urban and agricultural densities.

Policy 3: Provide for in-filling of rural residential development in areas already committed to that land use.

West Petaluma Area Plan

The West Petaluma Area Plan was adopted in August 1981 and most recently amended in September 2008. The plan was prepared pursuant to General Plan Policy LU-1a (described above). The Plan Area encompasses the unincorporated community of Petaluma northwest, west, and south of Petaluma, including all Petaluma Rezoning Sites. The following goals would be applicable to development within the Plan Area:

General Goal 1: Preserve agricultural lands and encourage agriculture.

General Goal 2: Utilize environmental-suitability criteria to locate rural growth and guide urban growth.

General Goal 3: Encourage a pattern of growth which maintains the existing range of types of communities; the unincorporated villages and towns and cities.

General Goal 4: Preserve the identities of present communities.

General Goal 6: Promote compactness of all community boundaries in order to reduce the cost of providing urban level services within these areas.

The West Petaluma Area Plan also states that "Densities on County land should remain low with lot sizes larger than 1.5-2 acres per dwelling unit unless City services can be provided, annexation is arranged, and plans for additional development are approved by the City. Where these development criteria can be met and services can be provided, densities will be permitted to increase up to 2 dwelling units per acre.

Sonoma County Zoning Ordinance

Zoning is the instrument that implements the land use designations of the General Plan. In addition to establishing permitted uses, zoning may also establish development standards relating to issues such as intensity, setbacks, height, and parking. Projects submitted to the County for review and approval are generally evaluated for consistency with the zoning designations.

The County's Zoning Ordinance carries out the policies of the County General Plan by classifying and regulating the uses of land and structures within the Unincorporated County, consistent with the General Plan. The Zoning Code describes various types of zoning districts and land use classifications, land use regulations, development standards, and environmental performance standards. The Zoning Ordinance applies to all land uses, subdivisions, and development within the County. The purpose of the Zoning Ordinance is to protect and to promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents, and businesses in the County. More specifically, the purposes of this Zoning Ordinance are to:

1. provide for the orderly and beneficial land use of the County;
2. protect the character and social and economic stability of agricultural, residential, commercial, industrial and other communities within the County;
3. protect the public safety and welfare by regulating the location and uses of all structures and land; and
4. protect and conserve the scenic, recreational and natural resource characteristics of the County.

The Zoning Code provides guidelines for collaboration between incorporated cities and the County when development is proposed within a city's sphere of influence. For example, the County maintains a process with the City of Santa Rosa for joint review of projects in the City of Santa Rosa sphere of influence.

The Unincorporated County is divided into base zoning districts and combining zoning districts that are listed below:

1. **Base Zoning**
    a. Land Intensive Agriculture (LIA)
    b. Land Extensive Agriculture (LEA)
    c. Diverse Agriculture (DA)
    d. Resources and Rural Development (RRD)
    e. Timberland Production (TP)
    f. Agriculture and Residential (AR)
    g. Rural Residential (RR)
    h. Low Density Residential (R1)

i. Medium Density Residential (R2)
j. High Density Residential (R3)
k. Planned Community (PC)
l. Administrative and Professional Office (CO)
m. Neighborhood Commercial (C1)
n. Retail Business and Service (C2)
o. General Commercial (C3)
p. Limited Commercial (LC)
q. Commercial Rural (CR)
r. Agricultural Services (AS)
s. Recreation and Visitor-Serving Commercial (K)
t. Industrial Park (MP)
u. Limited Urban Industrial (M1)
v. Heavy Industrial (M2)
w. Limited Rural Industrial (M3)
x. Public Facilities (PF)
y. Study (S)

2. **Combining Districts**
   a. Floodway (F1)
   b. Floodplain (F2)
   c. Affordable Housing (AH)
   d. Renewable Energy (RE)
   e. Local Guidelines (LG)
   f. Scenic Resources (SR)
   g. Riparian Corridor (RC)
   h. Biotic Habitat (BH)
   i. Valley Oak Habitat (VOH)
   j. Historic (HD)
   k. Geologic Hazard Area (G)
   l. Mineral Resource (MR)
   m. Workforce Housing (WH)
   n. Accessory Dwelling Unit Exclusion (Z)
   o. Visitor Residential (VR)
   p. B Districts (B6, B7, or B8), identifying maximum permitted density or minimum parcel or lot size
   q. Vacation Rental Exclusion (X)
   r. Traffic Sensitive (TS)

City of Sonoma General Plan

Rezoning Sites SON-1 through SON-4 are within the City of Sonoma's UGB, and development must be consistent with the City of Sonoma's General Plan. The City of Sonoma's 2020 General Plan was adopted in October 2006. Each 2020 General Plan element contains goals, policies and implementation measures that set a course for future land use in the city. Goals summarize how development and future growth should be directed to achieve the general plan vision by identifying physical, economic and/or social ends that the community wishes to achieve.

The City's UGB is a line beyond which urban development will not be allowed, except for public parks and public schools. The UGB is meant to focus future growth within the city in order to prevent urban sprawl into agriculturally and environmentally sensitive areas surrounding the city, and protect the health, safety, welfare, and quality of life of the residents of Sonoma by concentrating future residential, commercial, and industrial growth in areas already served by urban services.

City of Petaluma General Plan

Rezoning Sites PET-1 through PET-4 are within the City of Petaluma's UGB, and development must be consistent with the City of Petaluma's General Plan. The City of Petaluma's General Plan 2025 was adopted May 19, 2008 and took effect on June 18, 2008. The General Plan identifies current and future needs in areas such as land use, housing, transportation, public services, environmental quality, and economic viability. The General Plan is also a policy document that embodies the community's goals and guides decisions about physical development over the long term. The City's UGB is meant to:

1. Encourage efficient growth patterns and protect the quality of life by concentrating future development largely within existing developed areas;
2. Promote uses that foster public health and safety and productive investment for farming enterprises on lands outside Petaluma's UGB;
3. Foster and protect Petaluma's natural setting while encouraging appropriate economic development in accordance with the city's unique local conditions;
4. Concentrate growth within a well-defined UGB in order to limit the extent of required City services and restrain increases in their costs;
5. Allow the City to continue to meet the housing needs for all economic segments of the population, especially lower and moderate income households, by directing the development of housing into areas where services and infrastructure can be provided more cost effectively; and
6. Promote stability in long-term planning for the city by establishing a cornerstone policy within the General Plan designating the geographic limits of long-term urban development and allowing sufficient flexibility within those limits to respond to the city's changing needs over time.

City of Santa Rosa General Plan

Rezoning Sites SAN-1 through SAN-10 are within the City of Santa Rosa's UGB, and development must be consistent with the City of Santa Rosa's General Plan per the City's annexation process for development within the UGB. The City of Santa Rosa's General Plan 2035 was adopted November 3, 2009. The General Plan 2035 addresses issues related to the physical development and growth of Santa Rosa. It represents a community's aspirations for the future. The City intends for urban development to occur within the designated UGB, following annexation into the official City

boundaries. As described above, the County participates in a joint review process with the City of Santa Rosa for projects in the City of Santa Rosa UGB.

4.11.3 Impact Analysis

a. Significance Thresholds and Methodology

The analysis in this section focuses on the compatibility of land uses identified in the proposed project with existing and planned land uses within the Rezoning Sites, as well as consistency with any applicable land use plans, policies, or regulations. The following thresholds of significance are based on Appendix G of the *CEQA Guidelines*. For purposes of this Program EIR, implementation of the project may have a significant adverse impact if it would do any of the following:

1. Physically divide an established community
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect

The plan consistency analysis describes existing regional and local plans and policies and is intended to fulfill the requirements of *CEQA Guidelines* Section 15125(d). The emphasis of the analysis is on plan inconsistency and potential conflicts between the project and existing applicable land use plans, and whether any inconsistencies are significant environmental effects. The project is considered consistent with the provisions of the identified regional and local plans if it meets the general intent of the applicable plans and does not conflict with any directly applicable policies. A given project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation. Courts have also acknowledged that general and specific plans attempt to balance a range of competing interests, and that it is nearly, if not absolutely, impossible for a project to be in perfect conformity with each and every policy set forth in the applicable plan. Additionally, in reaching such consistency conclusions, the County may also consider the consequences of denial of a project, which can also result in other policy inconsistencies. For example, Government Code Section 65589.5 explains that the potential consequences of limiting the approval of housing are reduced mobility, urban sprawl, excessive commuting, and air quality deterioration.

For an impact to be considered significant, any inconsistency would also have to result in a significant adverse change in the environment not already addressed in the other resource chapters of this EIR. The analysis below provides a brief overview of the most relevant policies from the various planning documents. However, the County's consistency conclusions are based upon the planning documents as a whole. As such, this section only addresses inconsistencies with the General Plan policies that may result in significant environmental impacts. CEQA does not require evaluation of all inconsistencies between the project and the General Plan, nor discussion of all General Plan policies that may be related to the proposed project. The EIR includes all applicable General Plan policies and discusses inconsistencies between these and the project as they pertain to environmental impacts.

b. Project Impacts and Mitigation Measures

Threshold:	Would the project physically divide an established community?

Impact LU-1 PROJECT IMPLEMENTATION WOULD PROVIDE FOR ORDERLY DEVELOPMENT IN THE UNINCORPORATED COUNTY AND WOULD NOT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would result in the rezoning of parcels that are within Urban Service Areas and are surrounded by existing developed parcels. The development of these sites would not result in the construction of barriers, such as new roads, that would divide the existing communities surrounding the sites. Short-term construction impacts would be constrained within the sites themselves; however, off-site improvements for utilities or transportation infrastructure would be required (refer to Section 4.16, *Transportation*, and Section 4.18, *Utilities and Service Systems*) for some of the sites. These off-site improvements would be constructed within roadway rights-of-way and would not block access between existing communities. Mitigation Measure TRA-2 requires the implementation of a construction traffic management plan, which would ensure roadways remain open and operable during construction activities. Therefore, existing roadways would not be blocked, and construction would not limit access to a community or restrict movement within a community. Furthermore, Figure 4.11-1 through Figure 4.11-11 show the existing zoning of the Rezoning Sites and surrounding areas. As shown in these figures, modifying the land use and zoning of the Rezoning Sites would not disrupt established communities, as adjacent land is currently used or zoned for residential purposes. With few exceptions, all Rezoning Sites are adjacent to existing residential land uses and/or zoning on at least one parcel boundary. LAR-6 is diagonally adjacent to a medium-density residential district, and it should be noted it is directly adjacent to LAR-1 and LAR-2, which would provide continuity between the existing and proposed residential uses. The same situation is true for GLE-1, which is diagonally adjacent to a residential parcel, with GLE-2 providing continuity with GLE-1 and adjacent residential uses. PEN-1, PEN-3, PEN-5, PEN-8, and PEN-9 are within a small commercial area and not directly adjacent to residential uses. However, these sites are adjacent to one another, and would establish a small residential area similar to nearby small higher-density residential areas.

The project would encourage future development that would infill within designated Urban Service Areas. This type of development would not divide a community; rather it would promote the development of existing vacant or underutilized properties, thereby locating people closer to existing employment, goods and services within an established community. Impacts related to dividing an established community would be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact LU-2 THE PROJECT WOULD NOT RESULT IN A SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO A CONFLICT WITH ANY LAND USE PLAN AND POLICY. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Regionally and locally adopted land use plans, policies, and regulations, including Plan Bay Area 2050 and the existing Sonoma County General Plan, apply to the project. The project's consistency with Plan Bay Area 2050 is discussed below, followed by the project's consistency with the County General Plan. Specific General Plan policy consistency analysis presented in Table 4.11-3. The project's consistency with the County's Zoning Ordinance is also discussed below. In accordance with the scope and purpose of this EIR, the policy consistency analysis focuses on goals and policies that relate to avoiding or mitigating an environmental effect. Only goals and policies relevant and applicable to the project are included. Goals and policies that are redundant between elements are omitted, as well as goals and policies that call for County actions that are independent of review and approval or denial of the project. The project is determined to be either "consistent" or "inconsistent" with the identified goals and policies. If an inconsistency is identified that inconsistency is evaluated to determine whether that inconsistency would result in a potentially significant environmental effect.

PLAN BAY AREA 2050

Plan Bay Area 2050 includes eight housing strategies, all of which fall within the following three themes:

1. Protect and preserve affordable housing.
2. Spur housing production for residents of all income levels.
3. Create inclusive communities.

The proposed project would result in an increased availability of housing and affordable housing for all income levels in the Unincorporated County, following buildout of the Rezoning Sites. Additionally, the Rezoning Sites are located in Urban Service Areas near developed urban areas, which would result in the development of housing near existing community resources in a manner that promotes more inclusive communities. As such, the project would be consistent with the themes described above. Generally, the Housing Element also prioritizes development within urban service areas close to existing development, which aligns it with the VMT reducing goals of Plan Bay Area 2050. Plan Bay Area 2050 seeks to mitigate emissions and reduce future climate impacts at the employer level by expanding commute trip reduction programs, incentivizing employment growth and development in areas with available walking, bicycle, and public transportation infrastructure, and encouraging residents to drive less through transportation demand management initiatives. Economic and land use strategies in Plan Bay Area 2050 that may help to reduce VMT include:

EC4. Allow greater commercial densities in Growth Geographies. Allow greater densities for new commercial development in select Priority Development Areas and Transit-Rich Areas to encourage more jobs to locate near public transit.

EC5. Provide incentives to employers to shift jobs to housing-rich areas well served by transit. Provide subsidies to encourage employers to relocate offices to housing-rich areas near regional rail stations.

EC6. Retain and invest in key industrial lands. Implement local land use policies to protect key industrial lands, identified as Priority Production Areas, while funding key infrastructure improvements in these areas.

SONOMA COUNTY GENERAL PLAN

The General Plan Land Use Element identifies goals, objectives, and policies for the location and intensity of growth in the County, and the current General Plan Housing Element identifies goals, objectives, and policies for the promotion of affordable housing and housing for special needs populations. Detail regarding the project's consistency with specific, relevant General Plan goals, objectives, and policies that avoid or mitigate an environmental effect is provided in Table 4.11-3.

As noted under Government Code Section 65589.5(a), the Legislature has concluded that "the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California." More specifically, the Legislature's stated intent is "to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal" (Government Code Section 65581). The proposed project would help meet the County's RHNA allocation, as well as the County's desire to provide higher-density housing throughout the unincorporated areas. The project provides the opportunity for future development of medium-density housing, which is supportive of the County's goal and policies. As outlined above in Table 4.11-3, the project would be substantially consistent with the County General Plan as a whole. However, it should be noted that the project consists of updating the Housing Element of the General Plan itself. This process of updating the General Plan includes amendments to the General Plan, and the General Plan Land Use Map. These updates are generally consistent with the General Plan's longstanding policies directing growth within designated urban service boundaries; however, Table 4.11-3 notes inconsistencies with Policy LU-19a, LU-20b, and LU-20hh. However, as stated in the *Significance Thresholds and Methodology* section above, a project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation. As shown in Table 4.11-3, the project is consistent with the vast majority of the relevant policies in the County General Plan.

Table 4.11-3 Project Consistency with the Sonoma County General Plan

General Plan Policy	Discussion
Goal LU-1: Accommodate Sonoma County's fair share of future growth in the San Francisco Bay Area region as shown on Tables LU-2 and LU-5 in a manner consistent with environmental constraints, maintenance of the high quality of life enjoyed by existing residents, and the capacities of public facilities and services. Achieve a desirable balance between job opportunities and population growth. **Objective LU-1.1:** Correlate development authorized by the Land Use Plan with projected population and employment growth as shown on Tables LU-2 and LU-5. Provide an adequate but not excessive supply of residential, commercial and industrial lands to accommodate this projected growth, taking into account projected city annexations. **Objective LU-1.3**: Designate lands within the various land use categories to make available residential and employment opportunities and to achieve a balance between job opportunities and population growth countywide, subject to any constraints of environmental suitability, protection of agriculture and other resource protection, and availability of public services.	**Consistent.** The environmental constraints of the Rezoning Sites are described in Sections 4.2, 4.7, 4.9, 4.10, 4.12, and 4.19 of this EIR, and where possible, impacts are mitigated to a less than significant level. Section 4.15, *Public Services and Recreation*, and Section 4.18, *Utilities and Service Systems*, describe the availability of public services and utilities infrastructure to the Rezoning Sites, which are all located in designated Urban Service Areas. As described therein, there is adequate fire protection, police protection (with mitigation), school, parks, recreation, and wastewater (with implementation of Mitigation Measure UTIL-1), electricity, natural gas, telecommunications, and solid waste facilities to serve the Rezoning Sites. Furthermore, there would be adequate water facilities (with implementation of Mitigation Measure UTIL-1) to serve Rezoning Sites with the exception of Sites GEY-1 through GEY-4. There is not substantial evidence to determine that development on these sites would be adequately served by California American Water – Geyserville. As described in Section 4.14, *Population and Housing*, the project would not exceed projected population growth forecasts described by ABAG and the County. The project would not result in an excessive supply of residential land uses, as the County is currently experiencing a severe housing and affordable housing shortage.
Policy LU-1a: This plan has relied extensively upon policies and designations set forth in previous Specific Plans and Area Plans. The County shall continue to use the following selected Specific Plans and Area Plans to implement this plan. A Specific or Area Plan may establish more detailed policies affecting proposed development but may not include policies that are in conflict with the General Plan. In any case where there appears to be a conflict between the General Plan and any Specific or Area Plan, the more restrictive policy or standard shall apply. (1) Airport/Industrial Specific Plan (2) South Santa Rosa Area Plan (3) Bennett Valley Area Plan (4) Sonoma Mountain Area Plan (5) West Petaluma Area Plan (6) Petaluma Dairy Belt Area Plan (7) Penngrove Area Plan (8) Franz Valley Area Plan	**Consistent.** Santa Rosa sites are located within the South Santa Rosa Area Plan, Penngrove sites are located within the Penngrove Area Plan, Petaluma sites are located in the West Petaluma Area Plan, and GUE-1 is located within the former Russian River Plan boundaries. Development of these sites is not proposed at this time, and when proposed would be conducted in accordance with Policy LU-1a, where the more restrictive standards would apply. A determination of consistency with these plans (as applicable) would be made during the County's project review and approval process, based on the specific project design details. None of the Rezoning Sites are located in the Local Coastal Plan area. Therefore, the Local Coastal Plan would not apply.

General Plan Policy	Discussion
The following plans shall be repealed, but development guidelines contained therein shall be reviewed and updated and considered for adoption as "Local Area Development Guidelines," provided that they are consistent with the General Plan. Until such a time that these guidelines are adopted, any policies contained in these plans shall continue to apply provided they are consistent with the General Plan: (1) North Santa Rosa Plan (2) West Santa Rosa Plan (3) North Sonoma Valley Plan (4) South Sonoma Areas I and II (5) Lower River Plan (6) Hessel Plan (7) Russian River Plan (8) West Sebastopol Plan The Sonoma County Local Coastal Plan is the policy document that guides land use and development in the Coastal Zone. The Local Coastal Plan is intended to be a standalone policy document that integrates the appropriate General Plan goals, objectives, and policies with those necessary to comply with the California Coastal Act.	
Policy LU-1h: Evaluate Land Use Plan amendments subject to: (1) constraints of environmental suitability, (2) protection of agriculture, (3) availability of public services, (4) the County projected population and employment levels, (5) the need for workforce housing, and (6) other plan goals, objectives, and policies.	**Consistent.** Per Policy LU-1h, this EIR evaluates potential environmental constraints and suitability throughout, potential impacts to agricultural lands (Section 4.2, *Agriculture and Forestry Resources*), the availability of public services (Section 4.14, *Public Services and Recreation*, and Section 4.18, *Utilities and Service Systems*), and potential impacts from population growth (Section 4.14, *Population and Housing*). The need for higher-density housing is identified in Section 2, *Project Description*, and the project includes rezoning to allow higher-density housing. This section, in particular this table and impact analysis, provides a consistency determination with applicable goals, objectives, and policies.
Goal LU-2: Accommodate the major share of future growth within the nine existing cities and their expansion areas and within selected unincorporated communities, which are planned to have adequate water and sewer capacities. **Objective LU-2.2:** Allocate the largest portion of unincorporated area growth to communities with public sewer and water services. **Objective LU-2.3:** Limit the amount of population growth and development in rural portions of the County outside of the cities and the unincorporated communities. **Objective LU-2.4:** Coordinate with the cities and neighboring counties to maximize cooperative planning and implementation of the General Plan.	**Consistent.** The Rezoning Sites are all within designated Urban Service Areas, where the infrastructure for public services and utilities is already available for sites to connect. Sections 4.15 and 4.18 describe the availability of public services and utilities infrastructure to the Rezoning Sites. The County coordinated with incorporated cities during the site selection process, and the sites were chosen based on this coordination. As required by the County General Plan, planning development on these sites would be conducted cooperatively with the incorporated cities.

General Plan Policy	Discussion
Objective LU-2.5: Provide sufficient opportunities for higher density housing within the Urban Service Areas to accommodate the population growth quantified in the Housing Element Objectives for lower and moderate income units. Policy LU-2a: Maintain a residential holding capacity that is as close as possible to projected growth. Consider denial of Land Use Map amendments that add residential density in rural areas if residential holding capacity exceeds projected growth, recognizing that future development may not always use 100% of the capacity of all parcels. Policy LU-2c: Encourage the retention and production of diverse types of housing within Urban Service Areas in order to provide adequate housing choices for current and future residents. Policy LU-2d: Inventory, conserve and increase the amount and type of housing that accommodates those with special housing needs. Populations needing special types of housing include farm employees, the terminally ill, mentally disabled, handicapped people, abused spouses and children, and the homeless.	Section 4.14, *Population and Housing*, of this EIR describes the consistency of the project with growth projections for the Unincorporated County. None of the Rezoning Sites are located in rural areas, as they are all near established communities and incorporated cities. The project, by definition, would encourage the development of higher density housing within designated Urban Service Areas per Objective LU-2.5, and would provide an increased variety of housing types in Urban Service Areas, including higher-density housing, per Policies LU-2c and LU-2d.
Goal LU-3: Locate future growth within the cities and unincorporated Urban Service Areas in a compact manner using vacant "infill" parcels and lands next to existing development at the edge of these areas. **Objective LU-3.2:** Provide enough land for the expansion of cities and unincorporated Urban Service Areas to accommodate, but not substantially exceed, the projected urban growth. Lands planned for urban development in each planning area are shown on the Land Use Maps. **Objective LU-3.3:** Encourage "infill" development within the expansion areas of the cities and unincorporated communities. Policy LU-3b**:** In designated Urban Service Areas, maintain a residential holding capacity that is as close as possible to projected growth. Consider denial of Land Use Map amendments that add residential density if residential holding capacity exceeds projected growth, recognizing that future development may not use 100% of the capacity of all parcels. Policy LU-3c: Avoid urban sprawl by limiting extension of sewer or water services outside of designated Urban Service Areas pursuant to the policies of the Public Facilities and Services Element. LU-3e	**Consistent.** The project, by definition, would encourage future growth in designated Urban Service Areas on vacant or underdeveloped parcels. Section 4.14, *Population and Housing*, of this EIR describes the consistency of the project with growth projections for the Unincorporated County. All Rezoning Sites are within designated Urban Service Areas, where sewer and water service infrastructure is already available in the vicinity of the sites, although not always located directly adjacent to each Rezoning Site (refer to Section 4.18, *Utilities and Service Systems*).

General Plan Policy	Discussion
Goal LU-4: Maintain adequate public services in both rural and Urban Service Areas to accommodate projected growth. Authorize additional development only when it is clear that a funding plan or mechanism is in place to provide needed services in a timely manner. **Objective LU-4.1**: Assure that development occurs only where physical public services and infrastructure, including school and park facilities, public safety, access and response times, water and wastewater management systems, drainage, and roads are planned to be available in time to serve the projected development.	**Consistent.** Refer to Section 4.15, *Public Services and Recreation*; Section 4.18, *Utilities and Service Systems*; and Section 4.10, *Hydrology and Water Quality*, regarding the availability of public services, utilities, and drainage in the vicinity of Rezoning Sites. As described therein, there is adequate school, parks, public safety (with the payment of fair share fees for police protection), drainage, and wastewater (with implementation of Mitigation Measure UTIL-1) services and infrastructure to serve the Rezoning Sites. Furthermore, there would be adequate water service (with implementation of Mitigation Measure UTIL-1) to serve Rezoning Sites with the exception of Sites GEY-1 through GEY-4. There is not substantial evidence to determine that development on these sites would be adequately served by California American Water – Geyserville. Refer to Section 4.16, *Transportation*, regarding the adequacy of site access and road infrastructure in the vicinity of the Rezoning Sites.
Goal LU-6: Diversify new residential development types and densities. Include a range of urban densities and housing types in some unincorporated communities, and lower density in rural communities. In rural areas, housing types and densities should meet the needs of agricultural and resource users and provide limited residential development on large parcels. **Objective LU-6.1:** Provide opportunities for a range of urban housing types and densities in unincorporated communities, while retaining the character of these communities. **Objective LU-6.2:** Limit residential density to a maximum of one dwelling per acre in unincorporated communities with public water but without sewer systems. **Objective LU-6.6:** Encourage the development of adequate housing for farm workers and farm family members. Site specific environmental factors shall be considered in making decisions on development permits. Site specific factors which create health or safety problems or result in unmitigated significant environmental impacts may at times reduce densities that are allowed by the Land Use Map and zoning. Policy LU-6i: Provide expanded opportunities for a mix of residential and commercial or industrial use in Urban Service Areas.	**Consistent.** The project would encourage higher-density housing in Urban Service Areas that currently contain or are located near single-family housing. This would introduce new residential development types and densities, per Goal LU-6, and would utilize the AH Combining District to increase affordable housing in Urban Service Areas, per Objective LU-6.6 and Policy LU-6h. As stated in Section 4.18, *Utilities and Service Systems*, the Rezoning Sites are within areas where public water and public sewer connections are available in the general vicinity although not always located directly adjacent to each Rezoning Site. Refer to Section 4.7, *Geology and Soils*; Section 4.9, *Hazards and Hazardous Materials*; and Section 4.19, *Wildfire*, for a discussion of site-specific environmental factors that could create health and safety problems. As described under Impact LU-1, adjacent land to the Rezoning Sites are currently used or zoned for residential purposes. Additionally, as shown on Figure 4.11-1 through Figure 4.11-11, while the project would increase the density of residential areas within Urban Service Areas, there are opportunities for commercial development on nearby parcels in these areas, allowing for a mix of residential and commercial uses per Policy LU-6i.

General Plan Policy	Discussion
Goal LU-7: Prevent unnecessary exposure of people and property to environmental risks and hazards. Limit development on lands that are especially vulnerable or sensitive to environmental damage. **Objective LU-7.1:** Restrict development in areas that are constrained by the natural limitations of the land, including but not limited to, flood, fire, geologic hazards, groundwater availability and septic suitability. Policy LU-7a: Avoid General Plan amendments that would allow additional development in flood plains, unless such development is of low intensity and does not include large permanent structures. Policy LU-7b: Limit development in wetlands designated on Figure OSRC-3 of the Open Space and Resource Conservation Element. Policy LU-7c: Prohibit new permanent structures within any floodway. Require that any development that may be permitted within the flood plain to be raised above the 100 year flood elevation. Policy LU-7d: Avoid new commercial, industrial, and residential land use designations in areas subject to "high" or "very high" fire hazards, as identified in the Public Safety Element, unless the combination of fuel load, access, water supply, and other project design measures will reduce the potential fire related impacts of new development to insignificant levels.	**Consistent.** Refer to Section 4.7, *Geology and Soils*; Section 4.9, *Hazards and Hazardous Materials*; and Section 4.19, *Wildfire*, for a discussion of site-specific environmental factors that could create health and safety problems. Refer to Section 4.18, *Utilities and Service Systems*, for a discussion of sewer service to the Rezoning Sites. Refer to Section 4.10, *Hydrology and Water Quality*, regarding development in floodplains; as stated therein, Rezoning Sites GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, and PEN-9 are partially within a 100-year floodplain. Future development on these sites would be required to comply with Policy LU-7c, with site design placing permanent new structures outside of the floodway and raised above the 100-year flood elevation. Refer to Section 4.4, *Biological Resources*, regarding the presence of wetlands on the Rezoning Sites. Mitigation Measures BIO-15 and BIO-16 require jurisdictional delineations prior to development on Rezoning Sites and avoidance of wetland features or minimization of impacts to wetlands. Refer to Section 4.19, *Wildfire*, regarding the wildfire risk designation of each Rezoning Site. As stated therein, some of the sites are within Moderate Fire Hazard Severity Zones, and mitigation would be required to reduce impacts.
Goal LU-9: Protect lands currently in agricultural production and lands with soils and other characteristics that make them potentially suitable for agricultural use. Retain large parcel sizes and avoid incompatible non-agricultural uses. **Objective LU-9.1:** Avoid conversion of lands currently used for agricultural production to non-agricultural use. **Objective LU-9.2:** Retain large parcels in agricultural production areas and avoid new parcels less than 20 acres in the "Land Intensive Agriculture" category. **Objective LU-9.3:** Agricultural lands not currently used for farming but which have soils or other characteristics that make them suitable for farming shall not be developed in a way that would preclude future agricultural use. **Objective LU-9.4:** Discourage uses in agricultural areas that are not compatible with long term agricultural production. Policy LU-9c: Use rezonings, easements and other methods to ensure that development on agricultural lands does not exceed the permitted density except where allowed by the policies of the Agricultural Resources Element.	**Consistent.** Section 4.2, *Agriculture and Forestry Resources*, of this EIR addresses the existence of agricultural soils on each Rezoning Site. As stated therein, none of the Rezoning Sites contain prime farmland, unique farmland, farmland of statewide importance, forest land, or timberland. However, some of the Rezoning Sites are adjacent to existing agricultural uses, and Mitigation Measure AG-1 would require an agricultural protection buffer for future development on Sites GEY 1, GEY-4, GUE-2, GUE-3, LAR-7, FOR-3, FOR-5, SAN-10, SON-1, SON-2, SON-3, and SON-4.

General Plan Policy	Discussion
Objective LU-19.1: Avoid extension of Petaluma's Urban Service Boundary and limit urban residential development to the Urban Service Area when annexed by the City. Policy LU-19a: Use zoning to avoid new urban uses within the Petaluma Urban Service Area prior to annexation by Petaluma. Policy LU-19b: Refer to the City of Petaluma for review and comment any application for discretionary projects within one mile of the Urban Service Boundary.	**Partially Consistent.** PET-1 through PET-4 are located in the City of Petaluma's Urban Service Area, and would allow urban residential development on these sites, consistent with these objectives and policies. The County coordinated with the City of Petaluma during the site selection process, and the Petaluma sites were chosen to proceed with CEQA review based on this coordination. As required by the County General Plan, development on these sites will be overseen by both the City and County, where boundaries overlap. However, the project would facilitate new urban uses prior to annexation by Petaluma.
Objective LU-20.1: Seek to jointly coordinate and monitor development within the City of Sonoma and the unincorporated Urban Service Area. Discourage urban development within Sonoma's Urban Service Boundary until annexation by the city (excluding parcels within the Sonoma Valley Redevelopment Area). Policy LU-20a: Avoid urban residential and commercial development within Sonoma's Urban Growth Boundary until annexed by the City. Policy LU-20b: In general, encourage annexation by the city prior to urban development on parcels that are within the Sonoma Valley Sanitation District and within the city's primary Sphere of Influence. Require annexation for urban residential development in this area. Parcels within the Sonoma Valley Redevelopment Area are exempt from these policies. Policy LU-20c: Establish procedures for joint City/County review of major projects within the City and the County. Continue to utilize the Sonoma Valley Citizen's Advisory Commission as an advisory body to the two jurisdictions for this purpose.	**Partially Consistent.** SON-1 through SON-4 are located in the City of Sonoma's Urban Service Area and are within the Sonoma Valley Sanitation District and the city's primary sphere of influence. While urban development on these sites is discouraged prior to annexation into the city boundaries, the project does not propose development on these sites at this time but rezoning to allow for medium-density residential development. This would not conflict with these objectives and policies. Per these policies, future proposed development on SON-1 through SON-4 would be required to annex into the city prior to development. However, the project would facilitate urban residential development prior to annexation.
Policy LU-20gg: Land use for the Glen Ellen area, including residential densities, shall correspond with the General Plan Land Use Element for Sonoma Valley. New development in Glen Ellen shall be evaluated in the context of the following: (1) the relationship between growth and traffic congestion, (2) the boundaries and extent of Urban Service Areas, (3) the amount and location of recreation and visitor-serving commercial uses, (4) the need to upgrade existing structures and public infrastructure, and (5) the compatibility of rural development with protection of agriculture, scenic landscapes, and resources. Policy LU-20hh: All new development in the Glen Ellen area (as designated in the Glen Ellen Development and Design Guidelines) shall comply with the Glen Ellen Development and Design Guidelines, which are part of the County Development Code.	**Partially Consistent.** This Program EIR analyzes potential transportation impacts of GLE-1 and GLE-2 in Section 4.16, *Transportation*. Traffic congestion is not analyzed because it may not be considered a significant impact under CEQA. Those sites are both within the Urban Service Area for Glen Ellen and would not require expansion of or influence the boundaries of the existing Urban Service Area. Figure 4.11-7 shows the existing zoning of GLE-1, GLE-2, and surrounding areas. As shown therein, the recreation and visitor-serving commercial areas would not be modified by the rezoning of these sites. Section 4.15, *Public Services and Recreation*, and Section 4.18, *Utilities and Service Systems*, analyze whether the project would require upgrades to public facilities and infrastructure. As stated therein, no upgrades to existing facilities are anticipated for GLE-1 and GLE-2.

General Plan Policy	Discussion
	Section 4.2, *Agriculture and Forestry Resources*, and Section 4.1, *Aesthetics*, analyze the potential impacts on agricultural lands and scenic resources. Sites GLE-1 and GLE-2 do not contain prime farmland, unique farmland, farmland of statewide importance, forest land, or timberland, and are not zoned or adjacent to agricultural lands. The project does not propose development on these sites at this time but rezoning to allow for medium-density residential development, and future projects would be allowed by-right and would not be subject to review under the Glen Ellen Development and Design Guidelines as discussed in Section 4.1, *Aesthetics*, as only objective design standards would apply.
Goal 1: Sustain Existing Affordable Housing Programs and Affordable Units **Objective HE-1.1:** Continue existing County and Community Development Commission efforts and programs with the objective of producing at least 507 new affordable units [110 extremely low; 110 very low; 127 low; and 160 moderate income units] between 2015 and 2023. **Objective HE-1.4:** Retain existing rental units to serve lower-income and special needs households, including seniors, farmworkers and their families, single-parent households, transitional and supportive housing, residential care facilities and group homes. **Objective HE-1.5:** Limit the loss of existing housing stock to visitor-serving uses. **Objective HE-1.6:** Retain existing affordable housing stock located in mobile home parks.	**Consistent.** The project would not remove existing affordable housing, but would rezone sites to allow for increased housing densities on the Rezoning Sites, and apply the Workforce Housing (WH) Combining District or a higher-density residential zone to these sites. The project does not identify specific proposed housing developments on these sites, but the project may allow for the increased construction and availability of affordable housing options in the Unincorporated County, as the WH Combining District offers incentive for construction of affordable units via a streamlined approval process.
Goal 2: Promote the Use of Available Sites for Affordable Housing Construction and Provide Adequate Infrastructure ***Objective HE-2.1****: Assist developers and other interested parties in locating available* sites and accessing programs for the development of affordable housing, especially rental housing. **Objective HE-2.3**: Enhance opportunities for affordable housing production on all appropriate sites with adequate infrastructure and proximity to services. Policy HE-2a: Publish a popular summary that identifies available housing opportunity sites in the Unincorporated County. Provide site-specific development information and support for development proposals whenever possible in order to reduce up-front costs for interested housing developers. Policy HE-2f: Consider a variety of sites for higher-density and affordable housing when the following criteria are met: site is located within or adjacent to an Urban Service Area (USA); adequate utilities are available; site is located within 1/2 mile to goods,	**Consistent.** By design, the project would promote the use of undeveloped and underutilized sites for affordable housing developments. The project identifies such sites within areas of the Unincorporated County that are within proximity to the necessary public facilities and services (refer to Section 4.15, *Public Services and Recreation*, and Section 4.18, *Utilities and Service Systems*). This project identifies available housing opportunity sites, per Policy HE-2a, and sites were chosen based on the criteria outlined in Policy HE-2f.

General Plan Policy	Discussion
services and transit; and project is consistent with the land use policies of the General Plan.	
Goal 3: Promote Production of Affordable Housing Units **Objective HE-3.1**: Eliminate unneeded regulatory constraints to the production of affordable housing. **Objective HE-3.2**: Review and revise housing programs to address changing needs, including needs that may not be met by traditional housing units. Consider the use of new community housing models and innovative types of structures and building materials to meet a wide variety of housing needs while protecting the public health and safety. **Objective HE-3.3**: Increase opportunities for the production of affordable housing. Policy HE-3j: Continue to encourage affordable "infill" projects on underutilized sites within Urban Service Areas by allowing flexibility in development standards pursuant to state density bonus law (Government Code 65915).	**Consistent.** The project would increase opportunities for the development of affordable housing throughout the Unincorporated County by rezoning sites with higher density residential zones. Identified sites are generally undeveloped or underutilized and would be zoned for medium-density housing following approval of the project. Per Policy HE-3l, to the extent feasible, the Rezoning Sites proposed for the AH combining zoning district are located within Urban Service Areas, with adequate water and sewer supplies (Section 4.18, *Utilities and Service Systems*, with implementation of Mitigation Measure UTIL-1), near transit (Section 4.16, *Transportation*), near neighborhood-serving commercial uses (most Rezoning Sites are near commercial areas, with the exception of GUE-2, GUE-3, GUE-4, and AGU-3), near schools (Section 4.15, *Public Services and Recreation*), and at safe distances from major roadways (Section 4.3, *Air Quality*).
Goal 5: Promote Production of Housing Units for Special Needs **Objective HE-5.6:** Increase the supply of housing for farmworkers and other migrant workers. Policy HE-5k: Encourage construction of new housing for occupancy by: (1) farmworkers and their families; (2) year-round housing for unaccompanied farmworkers and other migrant workers; and (3) seasonal housing for unaccompanied farmworkers. Policy HE-5n: Housing intended for occupancy by farmworkers should be permitted in rural locations which are accessible to agricultural lands, pursuant to the farmworker housing ordinance (“bunkhouse ordinance”). Where feasible and close to services, allow more bunks and longer periods of farmworker housing occupancy in order to address the non-farm migrant worker housing need in the off-season.	**Consistent.** The project includes the rezoning of vacant or underutilized sites, with some sites designated for higher-density housing. While the Rezoning Sites are located within Urban Service Areas, they do provide access to nearby agricultural lands, as well as more developed urban areas with commercial and other uses.
Objective CT-1.2: Supplement the Highway 101 and SMART rail corridors with improvements designed to provide east/west access to these corridors. Policy CT-1b: Focus commute and through traffic onto Highway 101. Designate major arterial routes to serve primarily as connectors between urban areas. Policy CT-1c: Work with the Cities to provide locations for jobs, housing, shopping, and coordination of location of transit along the Highway 101 corridor to reduce the volume of traffic on east/west corridors.	**Consistent.** Rezoning Sites are located along or near the Highway 101 and/or SMART corridors, including GEY, LAR, SAN, PEN, and PET sites. The project would allow for the development of these Rezoning Sites with housing, which would be consistent with Policy CT-1c to concentrate housing along these corridors.

General Plan Policy	Discussion
Objective CT-1.5: Reduce greenhouse gas emissions by minimizing future increase in VMT, with an emphasis on shifting short trips by automobile to walking and bicycling trips. **Objective CT-1.8:** Improve demand for transit by development of a growth management strategy encouraging projects in urbanized areas that decrease distance between jobs and housing, increase the stock of affordable housing, and increase density. Policy CT-1d: Work with the Cities to provide jobs, housing, shopping, and coordination of local transit along the SMART passenger rail corridor to reduce the need for automobile travel to and from work and shopping centers. Policy CT-1k: Encourage development that reduces VMT, decreases distances between jobs and housing, reduces traffic impacts, and improves housing affordability. Policy CT-2f: Require discretionary development projects to provide bicycle and pedestrian improvements and gap closures necessary for safe and convenient bicycle and pedestrian travel between the project and the public transit system. Policy CT-2v: Require discretionary development projects, where nexus is identified, to provide crossing enhancements at bus stops, recognizing that many transit riders have to cross the street on one of the two-way commutes. Policy CT-2w: Increase the convenience and comfort of transit riders by providing more amenities at bus stops, including adequately-sized all-weather surfaces for waiting, shelters, trash cans, bike racks, and pedestrian-sized lighting. Required that these improvements be provided as part of nearby public or private development projects. Policy CT-3v: Where nexus exists, require private or public development to plan, design, and construct bicycle and pedestrian facilities to integrate with the existing and planned bicycle and pedestrian network.	**Consistent.** The project would facilitate the development of housing on identified Rezoning Sites, which are located near urban areas for the purpose of concentrating future housing developments in areas close to existing commercial and office uses. As described in Section 4.16, *Transportation*, the project would result in a small decrease in VMT (although not below VMT thresholds, which are discussed in detail in Section 4.16). The project would rezone sites to allow for increased housing densities on the Rezoning Sites and apply the WH Combining District or a higher-density residential zone to these sites. Regarding the provision of bicycle and pedestrian improvements, the provision of crossings at bus stops, individual discretionary development of the Rezoning Sites, when proposed, would be required to comply with Policies CT-2f, CT-2v, CT-2w, and CT-3v. Existing bicycle and pedestrian facilities are described in Section 4.16, *Transportation.*
Objective CT-1.6: Require that circulation and transit system improvements be done in a manner that, to the extent practical, is consistent with community and rural character. Minimizes disturbance of the natural environment, minimizes air and noise pollution, and helps reduce greenhouse gas emissions. **Objective CT-1.7:** Reduce travel demand countywide by striving to provide a jobs/housing balance of approximately 1.5 jobs per household and encourage creation of jobs and housing in urbanized areas along the SMART passenger rail corridor and other transit centers. Policy CT-3oo: Require new development in Urban Service Areas and unincorporated communities to provide safe, continuous, and convenient pedestrian access to jobs, shopping and other local services and destinations. Maintain consistency with City standards for pedestrian facilities in Urban Service Areas that are within a City's Sphere of Influence or Urban Growth Boundary.	**Consistent.** Regarding circulation and transit system improvements, the individual development of the Rezoning Sites, when proposed, would be required to comply with Objective CT-1.6. At this time, no circulation or transit improvements are proposed. As discussed previously, Rezoning Sites are located along or near the SMART corridors, including LAR, SAN, PEN, and PET sites, and would encourage the development of housing in areas near the SMART rail. The Rezoning Sites are located in unincorporated Urban Service Areas, consistent with Policy CT-3oo.

SOUTH SANTA ROSA AREA PLAN

The project would facilitate development on Rezoning Sites SAN-1 through SAN-10, within the South Santa Rosa Area Plan. With the exception of sites SAN-4 and SAN-9, the project's rezone of these sites with the WH Combining District would be inconsistent with this Area Plan. Therefore, amendment to the South Santa Rosa Area Plan would be required to ensure land use impacts resulting from this conflict in allowable density are less than significant. As described in Section 2.5, the project includes an amendment to the South Santa Rosa Area Plan. Therefore, with this amendment, the project would then be consistent with this Area Plan.

PENNGROVE AREA PLAN

The project would facilitate development on Rezoning Sites PEN-1 through PEN-9, within the Penngrove Area Plan. With the exception of sites PEN-1, PEN-3, and PEN-5, the project's rezone of these sites to accommodate a higher density of housing and/or application of the WH Combining District would be inconsistent with this Area Plan. Therefore, an amendment to the Penngrove Area Plan would be required to ensure land use impacts resulting from this conflict in allowable density are less than significant. As described in Section 2.5, the project includes an amendment to the Penngrove Area Plan. Therefore, with this amendment, the project would be consistent with this Area Plan.

WEST PETALUMA AREA PLAN

The project would facilitate development on Rezoning Sites PET-1 through PET-4, within the West Petaluma Area Plan; however, the project's rezone of these sites to accommodate a higher density of housing would be inconsistent with this Area Plan. Therefore, an amendment to the West Petaluma Area Plan or annexation into the City of Petaluma would be required to ensure land use impacts resulting from this conflict in allowable density are less than significant. As described in Section 2.5, the project includes an amendment to the West Petaluma Area Plan. Therefore, with this amendment, the project would be consistent with this Area Plan.

COUNTY ZONING ORDINANCE

The project would alter the zoning of the Rezoning Sites, for the future development of medium-density housing in the Unincorporated County. Future projects on these sites would be required to comply with the County's Zoning Ordinance specifications for the proposed zoning of the sites, which would be confirmed during the County development review process. The project would be consistent with the Zoning Ordinance. While the Draft EIR focuses on the impacts of the Rezoning Sites, adoption of the Housing Element will trigger a variety of amendments to the zoning code, as discussed in the Housing Element.

CITY OF SONOMA GENERAL PLAN

The project includes four sites located in the City of Sonoma's sphere of influence and UGB. While urban development on these sites is discouraged prior to annexation into the City, the project does not propose development on these sites at this time but rezoning to allow for medium-density residential development. Per these policies, future proposed development on SON-1 through SON-4 would be encouraged to obtain annexation into the City prior to development. Development of these sites would undergo joint City/County review, once applications are submitted, during the

permit approval processes. Therefore, this process would ensure that future development of these sites is consistent with the County and City General Plans.

CITY OF PETALUMA GENERAL PLAN

The project includes four sites located in the City of Petaluma's UGB, and would allow urban residential development on these sites. The County coordinated with the City of Petaluma during the site selection process, and the Petaluma sites were chosen based on this coordination. As required by the County General Plan, development on these sites would be overseen by both the City and County, where boundaries overlap. Therefore, this process would ensure that future development of these sites is consistent with the County and City General Plans.

CITY OF SANTA ROSA GENERAL PLAN

The project includes 10 sites located in the City of Santa Rosa's UGB, and would allow urban residential development on these sites. The County coordinated with the City of Santa Rosa during the site selection process, and the Santa Rosa sites were chosen based on this coordination. Development on these sites would be overseen by both the City and County, where boundaries overlap. Therefore, this process would ensure that future development of these sites is consistent with the County and City General Plans.

CONCLUSION

The project would not result in inconsistencies with the County's General Plan, Plan Bay Area 2050, 2017 Clean Air Plan, Santa Rosa Plain Conservation Strategy, North Coast Regional Water Quality Control Board's and San Francisco Bay Regional Water Quality Control Board's water quality control plans, 2015-2023 Reginal Housing Needs Assessment, or County Zoning Ordinance (refer to Sections 4.3, 4.4, 4.10, and 4.14 of this EIR) which would result in a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. This impact would be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.12 Mineral Resources

The analysis in this section addresses the potential for the proposed project to result in the loss of mineral resources to the region.

4.12.1 Setting

Mineral resources are extremely valuable because of their limited supply and their usefulness in modern construction and industrial processes. Sonoma County has many valuable mineral resources that were historically extracted, including mercury, chromite, and copper. Sand, gravel, crushed rock, and building stone are some of the more valuable mineral resources in the present day. As of 2011, the County contained approximately 951 million tons of identified PCC-grade aggregate resources, which the California Geologic Survey estimated to be able to meet aggregate demand for building and roadway construction until 2023 (California Geologic Survey 2013).

Removal of bedrock for building blocks, road base, and fill material has taken place in different areas and geologic settings of the County, but usually in highland areas with steep terrain (County of Sonoma 2006). Most of the Russian River and parts of other major streams in the County have been mined for sand and gravel to use in concrete and base and fill. Because of the difference in original materials and the processes involved, each geologic formation provides different types of useful minerals. The County has maps on file that show the local and extent of mineral resources considered significant by recent studies. Figure 4.12-1 shows identified mineral resources near the Rezoning Sites.

4.12.2 Regulatory Setting

a. Federal Regulations

U.S. Department of the Interior's Minerals Availability System

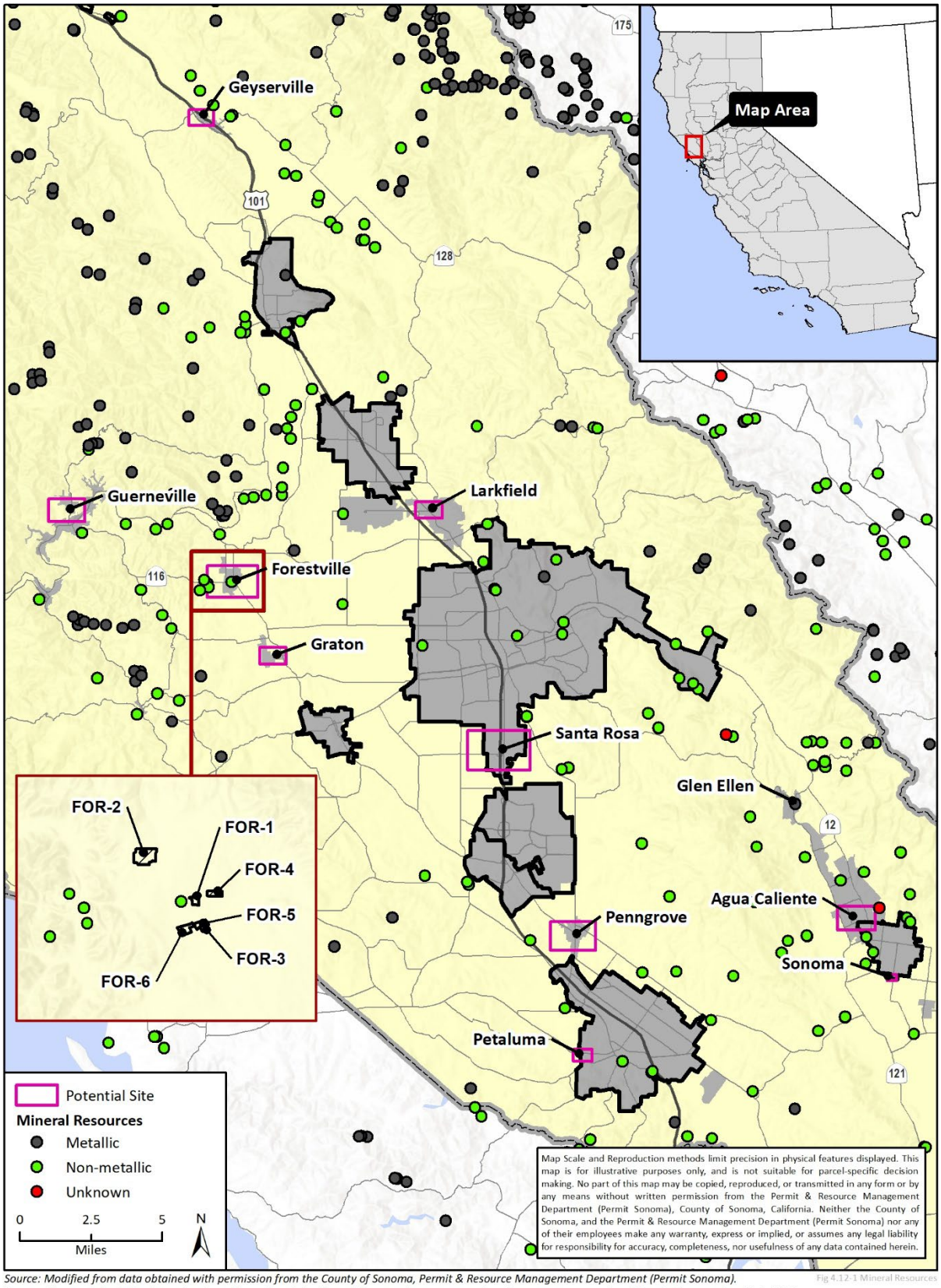
This system identifies between 15 and 17 rare Earth minerals as critical resources for United States Department of Defense applications or resources which are critical to national security. It recommends the development of a comprehensive approach to help ensure a secure supply of each resource and identifies risks as well as timeframes for actions.

b. State Regulations

Surface Mining and Reclamation Act

Gravel mining operations in Sonoma County, and throughout the State, are subject to the California Surface Mining and Reclamation Act (SMARA). The purpose of SMARA is to identify and protect areas containing significant mineral resources. In doing so, SMARA a) regulates surface mining operations to assure that adverse environmental effects are prevented or minimized, b) requires reclamation of mined lands to a usable condition that is readily adaptable to alternative land uses, c) produces and conserves minerals, and considers values relating to recreation, watershed, wildlife, range and forage, and aesthetic enjoyment, and d) eliminates residual hazards to the public health and safety. Mining must comply with SMARA through all phases of a project, including the reclamation process.

Figure 4.12-1 Mineral Resources in Sonoma County



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri; USGS.

Fig 4.12-1 Mineral Resources

c. Local Regulations

Sonoma County Aggregate Resources Management Plan

The Sonoma County Aggregate Resources Management (ARM) Plan serves as the regulatory document with guidelines and objectives for sound management of aggregate mining in the County. The County adopted this plan in 1980 and updated in 1994, 2003, and 2010. The ARM Plan aims to meet future aggregate needs using resources in the County and to recognize that continued production needs to be managed in a way that reduces depletion of those resources. It includes the following features in summary (County of Sonoma 2020a):

1. Incentives to stimulate quarry production
2. Plans for continued in-stream extraction for flood and erosion control with protection for fisheries and other adjacent uses
3. Limitations on terrace mining
4. Support for recycling of aggregate products
5. Reclamation of terrace mining areas for agricultural uses and habitat restoration
6. Road mitigation programs with fees

Other features and details are provided on the County's website, where the following objectives are also discussed (County of Sonoma 2020b):

Objective 1: Assist existing quarry operations to increase production for high-quality uses in an environmentally sound manner.

Objective 2: Facilitate new or expanded quarry operations at designated sites or at other locations with resources which can meet the needs for aggregate in an environmentally sound manner.

Objective 3: Provide for terrace resources to meet the needs for high quality uses for a ten-year period and terminate terrace mining at the end of that period.

Objective 4: Manage instream resources on a sustained yield basis for high quality uses in a manner which reduces bank erosion, maintains flood flow capacities, protects adjacent uses, and minimizes impacts on fisheries, vegetation, and wildlife.

Objective 5: Continue and expand monitoring programs so that more information is available for future decisions about terrace and instream impacts and alternative management policies and approaches.

Objective 6: Reevaluate gravel extraction methods and production periodically to assess options which would further reduce environmental impacts and land use conflicts or better meet the County's aggregate needs.

Objective 7: Change specifications, standards, and practices where possible so that quarry rock will be more competitive with instream and terrace sources.

Objective 8: Reduce the need for additional aggregate through utilization of recycled and substitute materials, changes in development standards, and other means possible.

Objective 9: Encourage the retention of locally produced aggregate for use within Sonoma County.

In addition to compliance with the ARM Plan, proposed new gravel operations require County approval of a mining and reclamation plan and a use permit pursuant to County Ordinance 3437, which sets forth local implementation of the SMARA.

Sonoma County General Plan

The Sonoma County General Plan Open Space & Resource Conservation Element includes goals and policies for the protection of mineral resources, as follows:

Goal OSRC-13: Provide for production of aggregates to meet local needs and contribute the County's share of demand in the North Bay production-consumption region. Manage aggregate resources to avoid needless resource depletion and ensure that extraction results in the fewest environmental impacts.

Objective OSRC-13.1: Use the ARM Plan to establish priority areas for aggregate production and to establish detailed policies, procedures, and standards for mineral extraction.

Objective OSRC-13.2: Minimize and mitigate the adverse environmental effects of mineral extraction and reclaim mined lands.

Policy OSRC-13a: Consider lands designated in the ARM Plan as priority sites for aggregate production and mineral extraction and review requests for additional designations for conformity with the General Plan and the ARM Plan.

Policy OSRC-13b: Review projects for environmental impact and land use conflicts and consider the following minimum factors when approving mining permits: topsoil salvage, vegetation, fisheries and wildlife impacts, noise, erosion control, roadway conditions and capacities, reclamation and bonding, air quality, energy consumption, engineering and geological surveys, aggregate supply and replenishment, drainage, and the need for economical aggregate materials.

Policy OSRC-13c: Review projects that are on or near sites designated "Mineral Resources" in the ARM Plan for compatibility with future mineral extraction.

Sonoma County Zoning Code

Article 72 of the County's Zoning Code (Mineral Resource Combining District) regulates mining and reclamation of mined lands in the County, consistent with the ARM Plan. Combined with several base zones, various uses are permitted as a right or subject to a use permit. Incompatible uses and residential uses are restricted. Provisions of this article require County approval of surface mining use permit and approval of a reclamation plan.

4.12.3 Impact Analysis

a. Significance Thresholds

For purposes of this EIR, implementation of the proposed project may have a significant adverse impact if the Rezoning Sites near mineral extraction sites would do any of the following:

1. Result in the loss of availability of a known mineral resource of value to the region and residents of the state
2. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan

b. Methodology

Impacts related to mineral resources were evaluated using information found in the County ARM Plan and on its website. Google Earth files and maps were also reviewed for areas near the Rezoning Sites.

c. Project Impacts and Mitigation Measures

Threshold:	Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Impact MIN-1 ALTHOUGH MINERAL EXTRACTION SITES OCCUR THROUGHOUT THE COUNTY, NONE ARE WITHIN THE 59 REZONING SITES. THERE WOULD BE NO IMPACT.

As shown in Figure 4.12-1, mineral resources are located in proximity to several of the Rezoning Sites, with the closest being a non-metallic resource near FOR-1. No mineral resources have been mapped within any of the Rezoning Sites, and rezoning of the Rezoning Sites as part of the Housing Element Update would therefore not interfere with mineral extraction operations of any of these identified mineral resources. As such, development facilitated by the project would have no impact to identified mineral resources.

Furthermore, all sites are in County-designated urban service areas where mining or mineral extraction is not allowed, according to the ARM Plan. There would be no impact regarding the loss of availability of known mineral resources in the project vicinity.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impact would occur.

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4.13 Noise

This section analyzes noise-related impacts associated with implementation of the proposed project, including temporary noise impacts from construction activity and long-term noise impacts from expected operation of development facilitated by the project.

4.13.1 Setting

a. Overview of Sound Measurement

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (Hz) and less sensitive to frequencies around and below 100 Hz (Kinsler, et. al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dBA; reducing the energy in half would result in a 3 dBA decrease (Crocker 2007).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (half) as loud (10.5 times the sound energy) (Crocker 2007).

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in level as the distance from the source increases. The manner in which noise reduces with distance depends on factors such as the type of sources (e.g., point or line, the path the sound will travel, site conditions, and obstructions). Noise levels from a point source typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance (e.g., construction, industrial machinery, ventilation units). Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). The propagation of noise is also affected by the intervening ground, known as ground absorption. A hard site, such as a parking lot or smooth body of water, receives no additional ground attenuation and the changes in noise levels with distance (drop-off rate) result from simply the geometric spreading of the source. An additional ground attenuation value of 1.5 dBA per doubling of distance applies to a soft site (e.g., soft dirt, grass, or scattered bushes and trees) (Caltrans 2013). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this "shielding" depends on the size of the object and the frequencies of the noise levels. Natural terrain features such as hills and dense woods, and man-made features such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight will provide at least a

5-dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2017). Structures can substantially reduce exposure to noise as well. The FHWA's guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important factors of noise impacts. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. One of the most frequently used noise metrics is the equivalent noise level (L_{eq}); it considers both duration and sound power level. L_{eq} is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over time. Typically, L_{eq} is summed over a one-hour period. L_{max} is the highest root-mean-square (RMS) sound pressure level within the sampling period, and L_{min} is the lowest RMS sound pressure level within the measuring period (Crocker 2007). L_n values are statistical noise levels (sometimes called percentiles) used to assess noise levels from fluctuating noise sources over time. The commonly used values of n for Ln are 10, 50, and 90. L_{10} is the level exceeded for 10 percent of the time; L_{50} is the level exceeded for 50 percent of the time; and L_{90} is the level exceeded for 90 percent of the time.

Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level (L_{dn}), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours; it is also measured using Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013). Noise levels described by L_{dn} and CNEL usually differ by about 1 dBA. The relationship between the peak-hour L_{eq} value and the L_{dn}/CNEL depends on the distribution of traffic during the day, evening, and night. Quiet suburban areas typically have CNEL noise levels in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 60-plus CNEL range. Normal conversational levels are in the 60 to 65-dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

b. Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of Hz. The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body starts from a low frequency of less than 1 Hz and goes to a high of about 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (FTA 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from

vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Discontinuities in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is impacted by vibration, a ground-to-foundation coupling loss will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may actually amplify the vibration level due to structural resonances of the floors and walls.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or RMS vibration velocity. The PPV and RMS velocity are normally described in inches per second. PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

Vibration limits used in this analysis to determine a potential impact to nearby land uses from construction activities are based on information contained in Caltrans' *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020). Maximum recommended vibration limits by American Association of State Highway and Transportation Officials (AASHTO) are identified in Table 4.13-1.

Table 4.13-1 AASHTO Maximum Vibration Levels for Preventing Damage

Type of Situation	Limiting Velocity (in/sec)
Historic sites or other critical locations	0.1
Residential buildings, plastered walls	0.2–0.3
Residential buildings in good repair with gypsum board walls	0.4–0.5
Engineered structures, without plaster	1.0–1.5

Source: Caltrans 2020

Based on AASHTO recommendations, limiting vibration levels to below 0.4 in/sec PPV at residential structures would prevent structural damage (plastered walls is indicative of construction processes that have not been common for over a 100 years and are therefore not anticipated to be near project construction). These limits are applicable regardless of the frequency of the source. However, as shown in Table 4.13-2 and Table 4.13-3, potential human annoyance associated with vibration is usually different if it is generated by a steady state or a transient vibration source.

Table 4.13-2 Human Response to Steady State Vibration

PPV (in/sec)	Human Response
3.6 (at 2 Hz)–0.4 (at 20 Hz)	Very disturbing
0.7 (at 2 Hz)–0.17 (at 20 Hz)	Disturbing
0.10	Strongly perceptible
0.035	Distinctly perceptible
0.012	Slightly perceptible

Source: Caltrans 2020

Table 4.13-3 Human Response to Transient Vibration

PPV (in/sec)	Human Response
2.0	Severe
0.9	Strongly perceptible
0.24	Distinctly perceptible
0.035	Barely perceptible

Source: Caltrans 2020

As shown in Table 4.13-2, the vibration level threshold at which steady vibration sources are considered to be distinctly perceptible is 0.035 in/sec PPV. However, as shown in Table 4.13-3, the vibration level threshold at which transient vibration sources (such as construction equipment) are considered to be distinctly perceptible is 0.24 in/sec PPV. This analysis uses the distinctly perceptible threshold for purposes of assessing vibration impacts.

Although groundborne vibration is sometimes noticeable in outdoor environments, groundborne vibration is almost never annoying to people who are outdoors; the vibration level threshold for human perception is assessed at occupied structures (FTA 2018). Therefore, vibration impacts are assessed at the structure of an affected property.

c. Existing Noise Setting

According to the County's General Plan 2020 Noise Element, substantial noise generators in the County include:

1. Traffic on State highways and major county roads
2. Aircraft operations at public use airports
3. Industrial and heavy commercial activities
4. Railroads
5. Infineon (Sears Point) International Raceway
6. The Geysers geothermal power plants
7. Solid waste landfills and transfer stations
8. Concerts, special events and other activities generating amplified outdoor sound

The principal noise generator occurring near the Rezoning Sites would be vehicle traffic. These include roadways near the Rezoning Sites that are identified as "Noise Impacted Road Segments" in Figure NE-1 of the County's General Plan 2020 Noise Element, including State Route 12, State Route 116, Highway 101, State Route 128, Old Redwood Highway, and Bodega Highway. Local collector streets typically are not considered substantial noise sources as traffic volume and speeds are generally lower than for freeways and major county roads. Ambient noise levels in the County vary depending upon proximity to these noise generators.

Some Rezoning Sites are located near areas identified as having industrial sources in Figure NE-1 of the County's General Plan 2020 Noise Element, such as the Larkfield, Forestville, Graton, Santa Rosa, and Penngrove sites.

Airports located in Sonoma County include the Charles M. Schulz Sonoma County Airport, the Cloverdale Municipal Airport, the Healdsburg Municipal Airport, the Petaluma Municipal Airport,

the Sonoma Skypark Airport, and the Sonoma Valley Airport. No development facilitated by the project would be near these airports.

Sonoma-Marin Area Rail Transit (SMART) is a passenger rail service currently operating from Marin County to Sonoma County as far north as the Sonoma County Airport. The line passes near Rezoning Sites in Penngrove and Santa Rosa. The Draft EIR for SMART determined that daily noise exposure would be between 47 and 54 dBA L_{dn} at 50 feet and between 43 and 49 dBA L_{dn} at 100 feet from the center of the railway (SMART District 2005). Noise exposure from the proposed passenger rail operations at distances greater than 25 feet from the tracks were determined to be less than 60 dBA L_{dn}.

No Rezoning Sites are located near the Infineon International Raceway, solid waste landfills and transfer stations, or the geothermal plants.

d. Sensitive Receivers

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. The County's Guidelines for the Preparation of Noise Analysis lists noise-sensitive uses as residences (including single-family homes, multi-family apartments, condominiums, and mobile homes, and other permitted structures in residential use), schools (both public and private), day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors.

Vibration sensitive receivers are similar to noise sensitive receivers, such as residences and institutional uses (e.g., schools, libraries, and religious facilities).

4.13.2 Regulatory Setting

a. Federal

Department of Housing and Urban Development

The federal Department of Housing and Urban Development (HUD) sets environmental criteria and standards in Title 24 of the Code of Federal Regulations (CFR), Part 51. New construction proposed in areas that exceed 65 dBA L_{dn} must incorporate noise attenuation features to maintain interior noise levels at 45 dBA L_{dn}. Development in areas exceeding 65 dBA L_{dn} requires further attenuation features. In general, the HUD regulations match the California state regulations discussed below.

b. State

California Building Code

CCR Title 24, Building Standards Administrative Code Part 2, the California Building Code, codifies the State noise insulation standards. These noise standards apply to new construction in California to control interior noise levels as they are affected by exterior noise sources. The regulations specify that interior noise levels for residential and school land uses shall not exceed 45 dBA CNEL.

California Green Building Code

California Green Building Standards Code 2016 (CalGreen) Section 5.507.4, Acoustical Control, regulates construction within the 65 dBA L_{dn} contour of an airport, freeway, expressway, railroad, industrial noise source, or other fixed source. According to Section 5.507.4.1.1, "buildings exposed

to a noise level of 65 dB L_{eq}(1-hr) during any hour of operation shall employ sound-resistant assemblies as determined by a prescriptive method (CalGreen Section 5.507.4.1) or performance method (CalGreen Section 5.507.4.2).

1. Projects may demonstrate compliance through the prescriptive method if wall and roof-ceiling assemblies exposed to the noise source shall meet a composite STC rating of at least 50 or a composite OITC rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30.
2. Projects may demonstrate compliance through the performance method if wall and roof-ceiling assemblies exposed to the noise source shall be constructed to provide an interior noise environment that does not exceed 50 dB L_{eq}-1-hour in occupied areas during hours of operations.

California General Plan Guidelines

The California General Plan Guidelines, published by the Governor's Office of Planning and Research, indicate acceptable, specific land use types in areas with specific noise exposure. The guidelines also offer adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. These guidelines are advisory, and local jurisdictions, including the County of Sonoma, have the authority to set specific noise standards based on local conditions. Please refer to the discussion below, under *Sonoma County General Plan 2020*, for the compatibility guidelines adopted by the County of Sonoma.

Caltrans Ground Borne Vibration Guidelines

The Transportation and Construction Vibration Guidance Manual provides guidance on vibration issues associated with the construction, operation, and maintenance of Caltrans projects. These guidelines address vibration criteria and establish thresholds for vibration-related annoyance to people, vibration-related damage to structures, and vibration-related adverse effects to sensitive equipment. This manual also addresses vibration prediction and screening assessment for construction equipment, methods that can be used to reduce vibration effects from transportation and construction sources, general procedures for addressing vibration issues, and vibration measurement and instrumentation. Guidelines and procedures provided in this manual should be treated as screening tools for assessing the potential for adverse effects related to human perception and structural damage.

c. Local Regulations

Sonoma County General Plan 2020

The Noise Element of the Sonoma County General Plan 2020 contains noise goals, objectives, and policies for the County, including:

Goal NE-1: Protect people from the adverse effects of exposure to excessive noise and to achieve an environment in which people and land uses may function without impairment from noise.

Objective NE-1.1: Provide noise exposure information so that noise impacts may be effectively evaluated in land use planning and project review.

Objective NE-1.2: Develop and implement measures to avoid exposure of people to excessive noise levels.

Objective NE-1.3: Protect the present noise environment and prevent intrusion of new noise sources which would substantially alter the noise environment.

Objective NE-1.4: Mitigate noise from recreational and visitor serving uses. The following policies shall be used to achieve the above objectives:

Policy NE-1a: Designate areas within Sonoma County as noise impacted if they are exposed to existing or projected exterior noise levels exceeding 60 dB L_{dn}, 60 dB CNEL, or the performance standards of Table 4.13-4.

Policy NE-1b: Avoid noise sensitive land use development in noise impacted areas unless effective measures are included to reduce noise levels. For noise due to traffic on public roadways, railroads and airports, reduce exterior noise to 60 dB L_{dn} or less in outdoor activity areas and interior noise levels to 45 dB L_{dn} or less with windows and doors closed. Where it is not possible to meet this 60 dB Ldn standard using a practical application of the best available noise reduction technology, a maximum level of up to 65 dB L_{dn} may be allowed but interior noise level shall be maintained so as not to exceed 45 dB L_{dn}. For uses such as Single Room Occupancy, Work-Live, Mixed Use Projects, and Caretaker Units, exterior noise levels above 65 dB L_{dn} or the Table 4.13-4 standards may be considered if the interior standards of 45 dB L_{dn} can be met. For schools, libraries, offices, and other similar uses, the interior noise standard shall be 45 dB L_{eq} in the worst-case hour when the building is in use.

Policy NE-1c: Control non-transportation related noise from new projects. The total noise level resulting from new sources shall not exceed the standards in Table 4.13-4 as measured at the exterior property line of any adjacent noise sensitive land use. Limit exceptions to the following:

(1) If the ambient noise level exceeds the standard in Table 4.13-4, adjust the standard to equal the ambient level, up to a maximum of 5 dBA above the standard, provided that no measurable increase (i.e. +/- 1.5 dBA) shall be allowed

(2) Reduce the applicable standards in Table 4.13-4 by five dBA for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises, such as pile drivers and dog barking at kennels

(3) Reduce the applicable standards in Table 4.13-4 by 5 decibels if the proposed use exceeds the ambient level by 10 or more decibels

(4) For short term noise sources which are permitted to operate no more than six days per year, such as concerts or race events, the allowable noise exposures shown in Table 4.13-4 may be increased by 5 dB. These events shall be subject to a noise management plan including provisions for maximum noise level limits, noise monitoring, complaint response and allowable hours of operation. The plan shall address potential cumulative noise impacts from all events in the area.

(5) Noise levels may be measured at the location of the outdoor activity area of the noise sensitive land use, instead of the exterior property line of the adjacent noise sensitive land use where:

(a) the property on which the noise sensitive use is located has already been substantially developed pursuant to its existing zoning, and

(b) there is available open land on those noise sensitive lands for noise attenuation. This exception may not be used on vacant properties which are zoned to allow noise sensitive uses.

Table 4.13-4 Maximum Allowable Exterior Noise Exposures for Non-transportation Noise Sources

Hourly Noise Metric[1], dBA	Daytime (7 a.m. to 10 p.m.)	Nighttime (10 p.m. to 7 a.m.)
L_{50} (30 minutes in any hour)	50	45
L_{25} (15 minutes in any hour)	55	50
L_{08} (4 minutes 48 seconds in any hour)	60	55
L_{02} (72 seconds in an hour)	65	60

[1] The sound level exceeded n% of the time in an hour, e.g., the L50 is the value exceeded 50% of the time or 30 minutes in any hour.

Source: Sonoma County General Plan 2020 Noise Element

Policy NE-1d: Consider requiring an acoustical analysis prior to approval of any discretionary project involving a potentially significant new noise source or a noise sensitive land use in a noise impacted area. The analysis shall:

(1) Be the responsibility of the applicant,

(2) Be prepared by a qualified acoustical consultant,

(3) Include noise measurements adequate to describe local conditions,

(4) Include estimated noise levels in terms of Ldn and/or the standards of Table 4.13-4 for existing and projected future (20 years hence) conditions, based on accepted engineering data and practices, with a comparison made to the adopted policies of the Noise Element. Where low frequency noise (ex: blasting) would be generated, include assessment of noise levels and vibration using the most appropriate measuring technique to adequately characterize the impact,

(5) Recommend measures to achieve compliance with this Element. Where the noise source consists of intermittent single events, address the effects of maximum noise levels on sleep disturbance,

(6) Include estimates of noise exposure after these measures have been implemented, and

(7) Be reviewed by the Permit and Resource Management Department and found to be in compliance with PRMD guidelines for the preparation of acoustical analyses.

Policy NE-1e: Continue to follow building permit procedures to ensure that requirements based upon the acoustical analysis are implemented.

Policy NE-1f: Require development projects that do not include or affect residential uses or other noise sensitive uses to include noise mitigation measures where necessary to maintain noise levels compatible with activities planned for the project site and vicinity.

Policy NE-1g: Enforce the State Noise Insulation Standards (Title 24, Part 2, California Administrative Code and Appendix Chapter 12 of the California Building Code) concerning new multiple occupancy dwellings.

Sonoma County Guidelines for Preparation of Noise Analysis

The County's Guidelines for the Preparation of Noise Analysis outlines the methods and recommendations for use when preparing an acoustical analysis in Sonoma County (County of

Sonoma 2019). The guidelines build on the Sonoma County General Plan 2020 Noise Element and outlines the noise analysis process, criteria for requiring a noise analysis, noise analysis protocol, and noise management methodology for individual projects. While the guidelines were not specifically developed for plan-level analyses, this analysis has been prepared in accordance with the County noise analysis guidelines.

The County guidelines address temporary construction noise, which is not specifically included in the General Plan 2020 Noise Element. The guidelines state that temporary construction noise generally needs to be evaluated at a qualitative level, given its temporary and short-term nature, however, construction noise may be considered significant if it occurs in the early morning or evening hours and require a quantitative analysis. If construction activities occur during the hours 10 p.m. to 7 a.m., then the noise standards in Table 4.13-4 would apply.

4.13.3 Impact Analysis

a. Significance Thresholds

The following thresholds of significance are based on Appendix G of the *CEQA Guidelines*. For purposes of this Program EIR, implementation of the project may have a significant adverse impact if it would result in any of the following:

1. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies
2. Generation of excessive groundborne vibration or groundborne noise levels
3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels

Specifically, per the *CEQA Guidelines* Appendix G, noise impacts would normally be considered significant if:

Construction Noise

1. Construction noise occurs between 10 p.m. to 7 a.m. and exceeds the noise limits in Table 4.13-4.

Operational Noise

1. Operational noise exceeds the noise limits in Table 4.13-4
2. For traffic-related noise, impacts would be considered significant if project would result in exposure of sensitive receptors to an unacceptable increase in noise levels. For purposes of this analysis, a significant impact would occur if project-related traffic increases the ambient noise environment of noise-sensitive locations by 3 dBA or more if the locations are subject to noise levels in excess of 60 CNEL for exterior areas or 45 CNEL for interior noise levels, or by 5 dBA or more if the locations are not subject to noise levels in excess of the aforementioned standards.

Vibration

1. For human receivers, the vibration level threshold to determine significance is 0.24 in/sec PPV (Caltrans 2020). For structures, based on AASHTO recommendations, the vibration level threshold to determine significance is 0.4 in/sec PPV.

Land Use Compatibility

1. Avoid noise sensitive land use development in noise impacted areas unless effective measures are included to reduce noise levels. For noise due to traffic on public roadways, railroads and airports, reduce exterior noise to 60 dB L_{dn} or less in outdoor activity areas and interior noise levels to 45 dB L_{dn} or less with windows and doors closed. Where it is not possible to meet this 60 dB Ldn standard using a practical application of the best available noise reduction technology, a maximum level of up to 65 dB L_{dn} may be allowed but interior noise level shall be maintained so as not to exceed 45 dB L_{dn}.

b. Methodology

Construction Noise

Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. RCNM provides reference noise levels for standard construction equipment, with an attenuation of 6 dBA per doubling of distance for stationary equipment.

Variation in power imposes additional complexity in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle of the activity to determine the L_{eq} of the operation (FHWA 2017). Each phase of construction has a specific equipment mix, depending on the work to be accomplished during that phase. Each phase also has its own noise characteristics; some will have higher continuous noise levels than others, and some have high-impact noise levels.

For general construction activities, construction noise would typically be higher during the heavier periods of initial construction (i.e., site preparation and grading work) and would be lower during the later construction phases (i.e., interior building construction). Heavy construction equipment during grading and site preparation for development facilitated by the project would typically include bulldozers, excavators, front-end loaders, dump trucks, and graders. It is assumed that diesel engines would power all construction equipment. Construction equipment would not all operate at the same time or location due to the different tasks performed by each piece of equipment. In addition, construction equipment would not be in constant use during the 8-hour operating day. An excavator, loader, and dump truck were analyzed together for construction noise impacts due to their potential of being used in conjunction with one another and therefore a reasonable scenario for the greatest noise generation during general construction activities. Using RCNM to estimate noise associated with construction equipment, hourly noise levels are calculated to be 80 dBA L_{eq} at 50 feet (RCNM calculations are included in Appendix NOI).

Impact devices such as pile drivers or breakers may be used for construction of development facilitated by the project. The use of pile drivers or breakers is not anticipated and is very unlikely to occur during construction for the type of development facilitated by the project. However, this

analysis considers the potential for use of this equipment as a conservative analysis. A pile driver could be used to drive foundation piles into the ground, and a breaker could be used to break up asphalt and concrete associated with demolition of existing buildings or to break up rocks. These devices would typically operate separately from other equipment. Using RCNM to estimate noise associated with impact devices, hourly noise levels are calculated to be 94 dBA L_{eq} at 50 feet for an impact pile driver and 80 dBA L_{eq} for a breaker (RCNM Calculations are included in Appendix NOI).

The use of blasting is not anticipated and is very unlikely to occur during construction for the type of development facilitated by the project. However, this analysis considers the potential for blasting as a conservative analysis. Blasting could be used to break up rock formations to allow for further grading and site prep. Blasting operations would be conducted through the use of drilling and blasting to fracture rocks. Blasting operations would be conducted by a licensed blasting contractor in compliance with pertinent Federal, State, and County requirements.

A single drill rig would be used to drill a pattern of boreholes. A contractor then loads the holes with carefully metered explosives. Each shot hole would be completely stemmed using fine gravel or dry sand. The shot is timed to detonate each hole(s) in sequence. This minimizes the ground vibration and noise of the blast, while maximizing fracture and controlling shot placement of the rock. The explosive material would consist of ammonium nitrate and fuel oil, known as ANFO. Blasting typically occurs through a short blast and would typically occur once per day due to the time required for setup. RCNM estimates the instantaneous noise level from blasting of 94 dBA L_{max} at 50 feet. Due to the short nature of a blast, with an instantaneous sound level lasting several seconds, RCNM calculates hourly noise levels from blasting as 74 dBA L_{eq} at 50 feet (RCNM calculations are included in Appendix NOI).

Groundborne Vibration

Development facilitated by the project would not include any substantial vibration sources associated with operation. Therefore, construction activities have the greatest potential to generate ground-borne vibration affecting nearby receivers, especially during grading and excavation of development facilitated by the project. The greatest vibratory source during general construction activities would be anticipated to be a dozer. An impact pile driver may be used during impact construction activities, if required. Construction vibration estimates are based on vibration levels reported by Caltrans and the FTA (Caltrans 2020; FTA 2018). Table 4.13-5 shows typical vibration levels for various pieces of construction equipment used in the assessment of construction vibration (FTA 2018).

Table 4.13-5 Vibration Levels Measured during Construction Activities

Equipment		PPV at 25 ft. (in/sec)
Pile Driver (impact)	Upper range	1.518
	Typical	0.644
Pile Driver (sonic)	Upper range	0.734
	Typical	0.170
Dozer		0.089

Source: FTA 2018

Blasting may also be required during construction to break up rocks. When explosive charges detonate in rock, almost all of the available energy from the explosion is used in breaking and

displacing the rock mass. However, a small portion of the energy is released in the form of vibration waves that radiate away from the charge location. The strength, or "amplitude," of the waves reduces as the distance from the charge increases. The rate of amplitude decay depends on local geological conditions but can be estimated with a reasonable degree of consistency, which allows regulatory agencies to control blasting operations by means of relationships between distance and explosive quantity. Very high blast over-pressure levels can rattle or sometimes break windows. However, air-blast over pressure rarely reaches levels that could cause building damage with modern blasting practices. Exact blast charge weights and locations are not known at this time. It was assumed that the blasting would use Ammonium Nitrate Fuel Oil. Sample vibration rates from blasting include 4.2 in/sec PPV and 7.3 in/sec PPV at 25 feet from a five-pound charge and ten-pound charge, respectively.

Operational Noise Sources

Noise sources associated with operation of the development facilitated by the project would consist of low speed on-site vehicular noise, landscaping maintenance, general conversations, and mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] units and generators). Due to the distances and low noise levels associated with general site activities and landscape maintenance, these sources are not considered substantial and are not analyzed further. The primary noise sources of concern would be HVAC and generator units.

HVAC UNITS

The HVAC unit used to estimate noise levels from development facilitated by the project is a typical to larger-sized (5-ton) residential condenser, a Carrier 38HDR060 split system condenser (see Appendix NOI for specification sheets). The manufacturer's noise data is provided below in Table 4.13-6.

Table 4.13-6 HVAC Noise Levels

125 Hz[1]	250 Hz[1]	500 Hz[1]	1 KHz[1]	2 KHz[1]	4 KHz[1]	8 KHz[1]	Overall Noise Level in A-weighted Scale (dBA)[2]
63.0	61.5	64.0	66.5	66.0	64.5	55.5	72.0

[1] Noise Levels in dB measured at octave frequencies

[2] Noise Levels for a Carrier 38HDR060 split system condenser (see Appendix NOI for specification sheets)

Hz = Hertz; KHz = kilohertz

GENERATORS

Generators may be installed at future project residences to provide power in case of a power outage, which are becoming more common in the County due to Public Safety Power Shutoffs. An example of a larger backup generator used to power a whole house during a power outage is a Generac Guardian Series 22 kW, which would generate a noise level of 67 dBA at 23 feet (se Appendix NOI for specification sheets).

TRAFFIC NOISE

Traffic generated from development facilitated by the project would increase noise levels on surrounding roadways. Traffic noise was analyzed for the following scenarios (Appendix TRA): Existing, Existing Plus Project, Cumulative, and Cumulative Plus Project. Traffic volumes were

determined from intersection vehicle turning volumes; the total turning volumes for each intersection were assumed on the roadways that meet at the intersection as shown in Table 4.13-7.

Table 4.13-7 Existing and Future Traffic Volumes (PM Peak Hour)[1]

Intersection	Nearest Rezoning Site (s)	Existing	Existing Plus Project	Cumulative	Cumulative Plus Project
Geyserville Ave & Canyon Rd	GEY-1 through GEY-4	420	464	590	634
River Rd (SR 116) & Armstrong Wood Rd/First St	GUE-1 through GUE-4	1,210	1,343	1,840	1,973
River Rd & Gravenstein Hwy (SR 116)	GUE-1 through GUE-4	1,220	1,321	1,850	1,951
Old Redwood Hwy & Fulton Rd	LAR-1 through LAR-8	1,570	1,596	2,300	2,326
Airport Blvd & Fulton Rd	LAR-1 through LAR-8	2,930	2,966	4,210	4,246
Old Redwood Hwy & Airport Blvd	LAR-1 through LAR-8	2,070	2,096	2,920	2,946
Old Redwood Hwy & Faught Rd	LAR-1 through LAR-8	1,740	1,767	2,460	2,487
Old Redwood Hwy & Wikiup Dr/Mark West Commons Cir	LAR-1 through LAR-8	1,920	1,983	2,580	2,643
Pocket Canyon Hwy/Front St (SR 116) & Mirabel Rd	FOR-1 through FOR-6	1,040	1,162	1,660	1,782
Gravenstein Hwy (SR 116) & Graton Rd/Frei Rd	GRA-1 through GRA-5	1,290	1,378	2,080	2,168
Todd Rd & Moorland Ave	SAN-1 through SAN-10	1,820	2,042	2,420	2,642
Todd Rd & S Moorland Ave/US 101 Southbound Ramps	SAN-1 through SAN-10	2,150	2,405	2,830	3,085
Todd Rd & Todd Rd Overpass	SAN-1 through SAN-10	2,130	2,370	2,390	2,630
Todd Rd & Santa Rosa Ave	SAN-1 through SAN-10	2,940	3,098	3,310	3,468
Arnold Dr & Warm Springs Rd	GLE-1 and GLE-2	760	768	950	958
Verano Ave & Riverside Dr	AGU-1 through AGU-3	1,270	1,355	1,470	1,555
Old Adobe Rd & Petaluma Hill Rd/Main St	PEN-1 through PEN-9	2,060	2,082	3,010	3,032
Old Redwood Hwy & Main St	PEN-1 through PEN-9	1,790	1,844	2,450	2,504
Bodega Ave & Paula Ln	PEN-1 through PEN-9	850	935	1,050	1,135
Broadway (SR 12) & Leveroni Rd/ Napa Rd	SON-1 through SON-4	2,240	2,265	2,530	2,555

[1] PM peak hour traffic volumes were used because they were generally represented the highest traffic volumes.

Source: Appendix TRA

c. Project Impacts and Mitigation Measures

Threshold:	Would the project result in generation of noise levels in excess of standards established in the County General Plan or Noise Ordinance? Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Impact NOI-1 CONSTRUCTION ACTIVITIES ASSOCIATED WITH DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN NOISE LEVEL INCREASES THAT WOULD EXCEED APPLICABLE CONSTRUCTION NOISE STANDARDS AT NEARBY NOISE SENSITIVE RECEIVERS. OPERATIONAL NOISE IMPACTS FROM HVAC UNITS AND GENERATORS WOULD POTENTIALLY EXCEED COUNTY STANDARDS IF LOCATED NEAR NOISE-SENSITIVE LAND USES. THESE WOULD BE SIGNIFICANT IMPACTS AND MITIGATION MEASURES WOULD BE REQUIRED.

Construction

GENERAL CONSTRUCTION ACTIVITIES

Most of the development facilitated by the project would be constructed near areas with existing noise-sensitive receivers, such as residences. Construction activities that occur between 7 a.m. to 10 p.m. would be required to comply with County standards, and therefore if construction took place during these hours, general construction activity noise levels would be less than significant.

Construction that occurs outside of the 7 a.m.to 10 p.m. allowed hours would be subject to the County noise standards listed in Table 4.13-4. Construction equipment could be located as close as 25 feet to the nearest noise-sensitive receivers, but would typically be located at an average distance further away due to the nature of construction (i.e., each piece of construction equipment would work in different locations throughout the day and average a further distance). It is conservatively assumed that the construction equipment would operate, on average, 50 feet from the nearest noise-sensitive receivers. At a distance of 50 feet, an excavator, loader, and a dump truck would generate a noise level of 80 dBA L_{eq} (RCNM calculations are included in Appendix NOI). The distance at which these pieces of equipment would generate 45 dBA L_{50} would be 2,800 feet. General construction activities that occur within 2,800 feet of existing noise-sensitive land uses between 10 p.m. to 7 a.m., construction noise levels would exceed the 45 dBA L_{50} County noise limit. Therefore, construction activities from development facilitated by the project could exceed the 45 dBA L_{50} County noise limit and could result in a substantial temporary or periodic increase in ambient noise levels in the development project vicinity above levels existing without the project. Due to the potential for substantial temporary or periodic increases in ambient noise, noise impacts from general construction activities during the nighttime hours would be significant and mitigation measures would be required.

IMPACT-RELATED CONSTRUCTION ACTIVITIES

Use of impact devices, such as an impact pile driver and a breaker, are not anticipated and unlikely to occur for development facilitated by the project. Construction activities that occur between 7 a.m. to 10 p.m. would be consistent with County standards, and therefore if construction took place during these hours, impact-related construction activity noise levels would be less than significant.

Impact-related construction that occurs outside of the 7 a.m.to 10 p.m. allowed hours would be subject to the County noise standards listed in Table 4.13-4. If these activities did occur, they could potentially occur within closer distances to noise-sensitive land uses as general construction activities described above. This is because impact devices are typically not mobile equipment and would be stationed at one area of a construction site throughout a typical construction day. Given typical setbacks and equipment size, a conservative close distance to existing noise-sensitive land uses for impact pile driving or a breaker would be 25 feet. At a distance of 25 feet, a pile driver would generate a noise level of 94 dBA L_{50} and a breaker would generate a noise level of 86 dBA L_{50}, respectively (RCNM calculations are included in Appendix NOI). The distance at which a pile driver would generate 45 dBA L_{50} would be 15,000 feet, and the distance that a breaker would generate 45 dBA L_{50} would be 2,800 feet. Therefore, if pile driving or breaking occurs within these distances of existing noise-sensitive land uses between 10 p.m. to 7 a.m., construction noise levels would exceed the 45 dBA L_{50} County noise limit. Therefore, impacts would be significant and mitigation measures would be required.

BLASTING

Use of blasting is not anticipated and unlikely to occur for development facilitated by the project. If blasting did occur, they may occur for development facilitated by the project that needs to demolish and remove rocks. Typically, a full blasting analysis cannot be done until after the site is cleared of all surface material (including any material that can be removed without blasting) to expose the specific type of material to be blasted, and until the extent of the area of blasting and the required blasting charge type are known. Blasting typically occurs through a short blast and would occur at most several times per day. Due to the short nature of a blast, with an instantaneously sound level lasting several seconds, the time averaged noise levels due to blasting do not generally reach levels that would exceed County standards. Construction activities that occur between 7 a.m. to 10 p.m. would be consistent with County standards, and therefore if blasting took place during these hours, blasting noise levels would be less than significant.

Blasting that occurs outside of the 7 a.m.to 10 p.m. allowed hours would be subject to the County noise standards listed in Table 4.13-4. Similar to impact-related construction activities, blasting activities could potentially occur within closer distances to noise-sensitive land uses as general construction activities described above. This is because blasting occurs in specific areas due to the underlying geology. For the purposes of this analysis, it is assumed blasting could occur as close as 25 feet to existing noise-sensitive land uses. At a distance of 25 feet, blasting would generate a noise level of 80 dBA L_{50} (RCNM calculations are included in Appendix NOI). The distance at which blasting would generate 45 dBA L_{50} would be 1,400 feet. Therefore, blasting conducted between 10 p.m. to 7 a.m. within this distance would exceed the 45 dBA L_{50} County noise limit and impacts would be significant, and mitigation measures would be required.

Operation

Development facilitated by the project would intensify noise sources compared to existing conditions. Existing noise-sensitive receivers near the Rezoning Sites may periodically be subject to noise associated with operation, which includes stationary noise from HVAC units and traffic generated from development facilitated by the project.

HVAC UNITS

HVAC units are typically placed on the ground for single-family residences, condos, and townhomes, and on the rooftops for apartment complexes. Each residential unit would typically have one HVAC unit. Given typical setbacks, the HVAC units could be potentially located within five feet of adjacent property lines.

At a distance of 5 feet, a Carrier 38HDR060 HVAC unit with no screening would result in a noise level of approximately 60 dBA L_{50}[1]. This would exceed both the County's daytime and nighttime maximum allowable operational exterior noise exposures. The HVAC units would not exceed the most restrictive noise limit of 45 dBA L_{50} from 10 p.m. to 7 a.m. at a distance of 30 feet. Therefore, without screening and assuming an HVAC unit similar to a Carrier 38HDR060, operational noise impacts from development facilitated by the project would be significant if located within 30 feet of a noise-sensitive land use. Mitigation measures would be required.

GENERATOR

Permanent backup generators for residences are typically placed on the ground in a similar fashion to HVAC units. Given typical setbacks, the generators could be potentially located within five feet of adjacent property lines. At a distance of five feet, a Generac Guardian Series 22 kW generator with no screening would result in a noise level of approximately 80 dBA L_{50}. This would exceed both the County's daytime and nighttime maximum allowable operational exterior noise exposures. The generators would not exceed the most restrictive noise limit of 45 dBA L_{50} from 10 p.m. to 7 a.m. at a distance of 300 feet. Therefore, without screening and assuming a generator similar to a Generac Guardian Series 22 kW, operational noise impacts would be significant if located within 300 feet of a noise-sensitive land use and mitigation measures would be required.

PARKING LOTS

Development facilitated by the project would include parking lots for the project residents and visitors. Parking lot noise can include vehicle arrival, limited idling of the vehicle, occupants exiting their vehicle, door closure, conversations among passengers, occupants entering the vehicle, vehicle startup, and departure. Excessive noise from parking lots is typically associated with large events (e.g., concert venues or other large events), where large groups of people are arriving or departing at similar times and congregating in the parking lots before or after events. Project parking lots would have residents arriving or departing throughout the day and would not have large groups or gatherings that are typical of large events (such as concerts or weddings). These activities at Rezoning Sites would not happen in such a concentrated manner within close proximity to adjacent property lines that noise levels would exceed County standards. Therefore, noise levels from parking lots would be less than significant.

OFF-SITE TRAFFIC NOISE

Per the traffic volumes analyzed in Table 4.13-7, the greatest percentage increase in roadway volumes (as determined by intersection turning volumes in Appendix TRA) from the Existing to Existing plus Project traffic scenario would be at Todd Road and Moorland Avenue and Todd Road and South Moreland Avenue, with a traffic increase of 11 percent. This is located near Rezoning Sites SAN-1 through SAN-10. The greatest percentage increases in intersection turning volumes from the Cumulative and Cumulative Plus Project traffic scenario would be at Todd Road and the

[1] L_n values are statistical noise levels (sometimes called percentiles) used to assess noise levels from fluctuating noise sources over time; L_{50} is the level exceeded for 50 percent of the time. See Section 14.13.1(a), above.

Todd Road Overpass, with a traffic increase of 9 percent, which is also located near Rezoning Sites SAN-1 through SAN-10. An 11 percent increase would represent an approximate 0.5 dBA increase in noise levels for the intersection of Todd Road and the Todd Road Overpass, which would not exceed the 3 dBA criteria (i.e., a barely perceptible noise increase) for off-site traffic noise impacts. Furthermore, some Rezoning Sites may be located in areas where the existing ambient noise level exceeds the 60 dBA L_{dn} exterior noise level standard, however, the project's contribution to existing traffic noise levels would not be perceptible. Therefore, development facilitated by the project would not result in a substantial permanent increase in ambient noise levels above existing levels. Impacts would be less than significant.

Mitigation Measures

NOI-1 General Construction Activities Noise Reduction Measures

If construction activities occur during nighttime hours as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation, within 0.5 mile of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), the following measures shall be implemented:

1) Nighttime construction noise shall not exceed the noise level standards shown in Table 4.13-4 when conducted between the hours of 10 p.m. to 7 a.m.
2) The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis.
3) The analysis of nighttime construction activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider the type of construction equipment to be used and the potential noise levels at noise-sensitive receivers located within 0.5 mile of the Rezoning Site.
4) Provided the nighttime construction noise analysis determines that nighttime noise levels will not exceed 45 dBA L_{50}, 50 dBA L_{25}, 55 dBA L_{08}, or 60 dBA L_{02} between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures.
5) Provided the nighttime construction noise analysis determines that nighttime noise levels would exceed the nighttime standards shown in Table 4.13-4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers or performing activities at a further distance from the noise-sensitive land use.

NOI-2 Pile Driver Noise and Vibration Reduction Measures

If pile driving activities occur within 2.8 miles of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), or, during daytime or nighttime hours, within 160 feet of a vibration-sensitive receiver (residences, research and advanced technology equipment), the following measures shall be implemented:

1) Daytime (7 a.m. to 10 p.m.)
    a. Pile Driving Vibration
        i. Use of a pile driver shall not occur within 160 feet of a vibration-sensitive receiver;

ii. Daytime pile driving vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers

2) Nighttime (10 p.m. to 7 a.m.):

a. Pile Driving Noise

i. Nighttime pile driving noise shall not exceed the noise level standards shown in Table 4.13-4 when conducted between the hours of 10 p.m. to 7 a.m.

ii. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis.

iii. The analysis of nighttime pile driving activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider the type of pile driver to be used and potential noise levels at noise-sensitive receivers located within 15,000 feet of the Rezoning Site.

iv. Provided the analysis concludes that noise levels will not exceed 45 dBA L_{50}, 50 dBA L_{25}, 55 dBA L_{08}, or 60 dBA L_{02} between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures.

v. Provided the analysis concludes that pile driving noise levels exceed the nighttime standards shown in Table 4.13-4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers to reduce noise levels.

b. Pile Driving Vibration

i. Use of a pile driver shall not occur within 160 feet of a vibration-sensitive receiver.

ii. Nighttime pile driving vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers.

iii. The project applicant shall retain a qualified consultant to prepare a project-specific construction vibration impact analysis.

iv. The analysis of nighttime pile driving vibration shall be completed in accordance with industry standards. The analysis shall consider the type of pile driver to be used and potential vibration levels at vibration-sensitive receivers located within 160 feet of the Rezoning Site.

v. Provided the analysis concludes vibration levels do not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, construction may proceed without additional measures.

vi. Provided the analysis concludes that pile driving vibration levels exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, additional measures shall be implemented to reduce vibration levels below the standard. These measures may include, but not be limited to, pre-drilling pile holes, utilizing a vibratory pile driver, or performing pile driving at a further distance from the noise-sensitive land use to reduce vibration levels.

NOI-3 BREAKER NOISE REDUCTION MEASURES

If construction activities use a breaker noise during nighttime hours as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation, within 0.5 mile of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), one of the following measures shall be implemented:

1) Nighttime breaker noise shall not exceed the noise level standards shown in Table 4.13-4 when conducted between the hours of 10 p.m. to 7 a.m.
2) The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis.
3) The analysis of nighttime breaker activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider type of breaker used and other factors of the environment and the potential noise levels at noise-sensitive receivers located within 0.5 mile of the Rezoning Site.
4) Provided the nighttime breaker noise analysis determines that nighttime noise levels will not exceed 45 dBA L_{50}, 50 dBA L_{25}, 55 dBA L_{08}, or 60 dBA L_{02} between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures.
5) Provided the nighttime breaker noise analysis determines that nighttime noise levels would exceed the nighttime standards shown in Table 4.13-4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers or performing breaking at a further distance from the noise-sensitive land use.

NOI-4 BLASTING NOISE AND VIBRATION REDUCTION MEASURES

If construction activities using blasting occurs during construction of a Rezoning Site, the following measure shall be implemented:

1) Daytime (7 a.m. to 10 p.m.)
    a. Blasting Vibration
        i. Daytime blasting vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers

2) Nighttime (as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation:
    a. Blasting Noise
        i. Nighttime blasting noise shall not exceed the noise level standards shown in Table 4.13-4 when conducted between the hours of 10 p.m. to 7 a.m.
        ii. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis.
        iii. The analysis of nighttime blasting activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider the blasting plan and potential noise levels at noise-sensitive receivers located within 0.25 mile of the Rezoning Site.

iv. Provided the analysis concludes that noise levels will not exceed 45 dBA L_{50}, 50 dBA L_{25}, 55 dBA L_{08}, or 60 dBA L_{02} between the hours of 10 p.m. to 7 a.m. construction may proceed without additional measures.

v. Provided the analysis concludes that pile driving noise levels exceed the nighttime standards shown in Table 4.13-4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers to reduce noise levels.

b. Blasting Vibration

i. Nighttime blasting vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers within 0.25 mile feet of the Rezoning Site.

ii. The project applicant shall retain a qualified consultant to prepare a project-specific construction vibration impact analysis.

iii. The analysis of nighttime blasting vibration shall be completed in accordance with industry standards. The analysis shall consider the blasting plan and potential vibration levels at vibration-sensitive receivers located within 0.25 mile of the Rezoning Site.

iv. Provided the analysis concludes vibration levels do not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, blasting may proceed without additional measures.

v. Provided the analysis concludes that pile driving vibration levels exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, additional measures shall be implemented to reduce vibration levels below the standard. These measures may include, but not be limited to, blasting mats shall be implemented to reduce vibration levels below the threshold.

NOI-5 HVAC Noise Reduction Measures

For an individual project that would place one or more HVAC unit(s) within 30 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of the HVAC unit(s) shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses, listed in Table 4.13-4. The analysis shall be completed in accordance with the County's current Guidelines for the Preparation of Noise Analysis. Noise control measures shall include, but are not limited to, the selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.

NOI-6 Generator Noise Reduction Measures

If an individual project would place permanent backup generators within 300 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of generators shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses, listed in Table 4.13-4. The analysis shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. Project specific noise reduction measures shall be implemented into the design plan during construction by the project applicant. Noise control measures that could be implemented include, but are not

limited to, the selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.

Significance After Mitigation

Impacts from general construction activities performed between 10 p.m. to 7 a.m. would be less than significant with implementation of Mitigation Measure NOI-1 because nighttime construction would be required to comply with the noise standards shown in Table 4.13-4 and also require a project specific noise analysis with detailed measures for reducing noise levels at noise sensitive receivers within 0.5 mile of the Rezoning Sites.

Impacts from construction using a pile driver performed between 10 p.m. to 7 a.m. would be less than significant with implementation of Mitigation Measure NOI-2 because nighttime pile driving would be required to comply with the noise standards shown in Table 4.13-4 and vibration standards for humans of 0.24 in/sec PPV and for structural damage of 0.4 in/sec PPV. A project specific noise and vibration analysis with detailed measures for reducing noise and vibration levels at sensitive receivers within 2.8 miles for noise and 160 feet for vibration.

Impacts from construction using a breaker performed between 10 p.m. to 7 a.m. would be less than significant with implementation of Mitigation Measure NOI-3 because nighttime breaker activities would be required to comply with the noise standards shown in Table 4.13-4 and also require a project specific noise analysis with detailed measures for reducing breaker noise levels at noise sensitive receivers within 0.5 mile of the Rezoning Sites.

Impacts from construction conducting blasting performed between 10 p.m. to 7 a.m. would be less than significant with implementation of Mitigation Measure NOI-4 because nighttime blasting would be required to comply with the noise standards shown in Table 4.13-4 and vibration standards for humans of 0.24 in/sec PPV and for structural damage of 0.4 in/sec PPV. A project specific noise and vibration analysis with detailed measures for reducing noise and vibration levels at sensitive receivers within 0.25 mile.

Impacts from operational noise from HVAC units would be less than significant with implementation of Mitigation Measure NOI-5 because HVAC noise would be required to comply with the noise standards shown in Table 4.13-4 and a project specific noise analysis with detailed measures for reducing noise levels at noise sensitive receivers would also require implementation as part of the project design.

Impacts from operational noise from generators would be less than significant with implementation of Mitigation Measure NOI-6 because generator noise would be required to comply with the noise standards shown in Table 4.13-4 and a project specific noise analysis with detailed measures for reducing noise levels at noise sensitive receivers would also require implementation as part of the project design.

Threshold:	Would the project result exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Impact NOI-2 IF PILE DRIVING OR BLASTING IS PERFORMED DURING CONSTRUCTION, VIBRATION FROM THIS EQUIPMENT MAY EXCEED APPLICABLE STANDARDS. THIS WOULD BE A SIGNIFICANT IMPACT AND MITIGATION MEASURES WOULD BE REQUIRED.

The greatest anticipated source of vibration during general construction activities would be from a dozer, which may be used within 25 feet of the nearest existing buildings when accounting for

setbacks and equipment size. A dozer would create approximately 0.089 in/sec PPV at a distance of 25 feet (FTA 2018). This would be lower than what is considered a distinctly perceptible impact for humans of 0.24 in/sec PPV, and the structural damage impact of 0.4 in/sec PPV. Therefore, impacts associated with vibration from the dozer (and other potential general construction equipment) would be less than significant.

Impact construction activities known to generate excessive ground-borne vibration include pile driving and breakers. Pile driving may be used during construction facilitated by the project. Given typical setbacks and equipment size, a pile driver may be used within 25 feet of the nearest existing buildings. This analysis conservatively assumes the use of an impact pile driver; the upper range for an impact pile driver would create approximately 1.518 in/sec PPV at a distance of 25 feet (FTA 2018). This would exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV, and the structural damage impact of 0.4 in/sec PPV. The distance to which an impact pile driver would exceed 0.4 in/sec PPV would be approximately 80 feet. Therefore, if an impact pile driver is used within 80 feet of the nearest building, impacts from vibration would be significant and mitigation measures would be required.

Breakers may be used during construction facilitated by the project. Given typical setbacks and equipment size, a breaker may be used within 25 feet of the nearest existing buildings. A breaker would create approximately 0.24 in/sec PPV at a distance of 25 feet (Caltrans 2020). This would not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV or the structural damage impact of 0.4 in/sec PPV. Therefore, impacts associated with vibration from a breaker would be less than significant.

Blasting may also be required during construction to break up rocks and can generate vibration in the form of vibration waves that radiate away from the charge location. Exact blast charge weights and locations are not known at this time. For this analysis, it is assumed blasting may occur as close as 25 feet to the nearest existing buildings. Sample vibration rates from blasting include 4.2 in/sec PPV and 7.3 in/sec PPV at 25 feet from a 5 pound charge and 10 pound charge, respectively, which would exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV, and the structural damage impact of 0.4 in/sec PPV. Impacts from blasting would be significant and mitigation measures would be required.

Development facilitated by the project would not involve substantial vibration sources associated with operation. Therefore, operational vibration impacts of development facilitated by the project would be less than significant.

Mitigation Measures

See Mitigation Measures NOI-2 and NOI-4 for reducing pile driving and blasting impacts, respectively.

Significance After Mitigation

Impacts associated with vibration from pile driving and blasting would be less than significant with implementation of Mitigation Measures NOI-2 and NOI-4.

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

Impact NOI-3 THERE ARE NO REZONING SITES WITHIN TWO MILES OF AN AIRSTRIP OR AIRPORT OR WITHIN THE NOISE CONTOURS FOR AN AIRSTRIP OR AIRPORT, AND NO IMPACTS WOULD OCCUR FROM EXPOSING RESIDENTS OR WORKERS TO EXCESSIVE AIRCRAFT NOISE LEVELS.

Airports located in Sonoma County include the Charles M. Schulz Sonoma County Airport, the Cloverdale Municipal Airport, the Healdsburg Municipal Airport, the Petaluma Municipal Airport, the Sonoma Skypark Airport, and the Sonoma Valley Airport. There are no private airstrips in the project area. The Air Transportation Element of the County General Plan contains noise contour maps from 55 to 75 CNEL for each airport. None of the noise contours overlap with Rezoning Sites. Therefore, no substantial noise exposure from airport noise would occur to construction workers or residents of development facilitated by the project, and no impacts would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impact would occur.

Threshold:	Would the project result in exposure of persons to noise levels in excess of standards established in the County General Plan?

Impact NOI-4 REZONING SITES LOCATED NEAR INDUSTRIAL SOURCES, WITHIN THE 60 AND 65 DB L_{DN} CONTOURS OF NEARBY ROADWAYS, AND/OR LOCATED NEAR A RAILROAD LINE/CROSSING MAY EXCEED THE COUNTY'S ACCEPTABLE NOISE LEVELS OF 60 DB L_{DN} OR LESS IN OUTDOOR ACTIVITY AREAS AND INTERIOR NOISE LEVELS TO 45 DB L_{DN} OR LESS WITH WINDOWS AND DOORS CLOSED. THIS WOULD BE A SIGNIFICANT IMPACT AND MITIGATION MEASURES WOULD BE REQUIRED TO REDUCE THE IMPACT TO LESS THAN SIGNIFICANT.

Table 1 of the County's Guidelines for the Preparation of Noise Analysis (County of Sonoma 2019) states that a noise analysis is required when placing a noise-sensitive land use (such as a residential project) located in or adjacent to:

1. A noise-generating land use;
2. A noise-impacted area identified in Attachment C of the Guidelines for the Preparation of Noise Analysis (roads and highways within the 60 and 65 dB L_{dn} contours);
3. 300 feet of a railroad line;
4. 900 feet of a railroad crossing; and/or
5. A public airport.

The following Rezoning Sites were identified in Figure NE-1 of the Sonoma County General Plan 2020 Noise Element as being located near an industrial land use or aggregate resource extraction area, and therefore may be located in or adjacent to a noise-generating land use: LAR-3, LAR-4, LAR-

5, FOR-3, FOR-5, FOR-6, GRA-1, GRA-2, SAN-1 through SAN-10, PEN-1, PEN-3, PEN-5, PEN-8, and PEN-9.

The following Rezoning Sites are located within impacted roadway noise contours identified in Attachment C of the Guidelines for the Preparation of Noise Analysis: GEY-1 through GEY-4, LAR-1, LAR-3, LAR-5, LAR-7, LAR-8, FOR-1, FOR-3, FOR-5, GRA-3, GRA-5, SAN-1 through SAN-9, GLE-1, AGU-2, AGU-3, PEN-1, PEN-3, PEN-5, PEN-6, PEN-8, PET-1 through PET-4, and SON-1 through SON-4.

The following Rezoning Sites are located within 300 feet of a railroad line and/or 900 feet of a railroad crossing: SAN-2, SAN-6 through SAN-9, PEN-1, PEN-3, PEN-5, PEN-6, PEN-8, and PEN-9.

As stated under Impact NOI-3, there are no Rezoning Sites within airport noise contours.

The Rezoning Sites identified above are located within areas that may cause noise levels to exceed the County's acceptable noise levels of 60 dB L_{dn} or less in outdoor activity areas and interior noise levels to 45 dB L_{dn} or less with windows and doors closed. Therefore, noise impacts to these Rezoning Sites would be significant and mitigation measures would be required.

Mitigation Measure

The following mitigation measure would ensure consistency of development facilitated by the project with the County's acceptable noise levels of 60 dB L_{dn} or less in outdoor activity areas and interior noise levels to 45 dB L_{dn} or less with windows and doors closed, respectively:

NOI-7 EXTERIOR AND INTERIOR LAND USE NOISE COMPATIBILITY COMPLIANCE

Rezoning Sites with that may exceed noise compatibility standards include: GEY-1 through GEY-4, LAR-1, LAR-3, LAR-4, LAR-5, LAR-7, LAR-8, FOR-1, FOR-3, FOR-5, FOR-6, GRA-1, GRA-2, GRA-3, GRA-5, SAN-1 through SAN-10, GLE-1, AGU-2, AGU-3, PEN-1, PEN-3, PEN-5, PEN-6, PEN-8, PEN-9, PET-1 through PET-4, and SON-1 through SON-4.

For Rezoning Sites where exterior noise levels may exceed 60 dB L_{dn} or greater in outdoor activity areas or where interior noise levels may exceed 45 dB L_{dn} or greater with windows and doors closed, the project applicant shall coordinate with the project architects and other contractors to ensure compliance with the County's noise standards to reduce noise levels in outdoor activity areas to less than 60 dB L_{dn} and interior noise levels to less than 45 dB L_{dn} with windows and doors closed.

The specific project-level land use compatibility analysis shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The information in the analysis may include, for exterior areas, the layout and placement of the outdoor area, and for interior areas the wall heights and lengths, room volumes, window and door tables typical for a building plan, as well as information on any other openings in the building shell. With this specific plan information, the analysis shall determine the predicted exterior and interior noise levels at the planned buildings. If predicted noise levels are found to be in excess of the applicable limits, the report shall identify architectural materials or techniques that shall be incorporated into the project to reduce noise levels to the applicable limits.

Measures to provide the required noise control may include, but are not limited to:

1. Exterior
    a) Use of sound walls between the outdoor areas and nearby roadways.
    b) Placement of the outdoor areas where building attenuation would partially block or fully block the line of sight between the area and nearby roadways.

2. Interior
    a) Installation of windows, doors, and walls with higher Sound Transmission Class ratings over minimum standards.
    b) Installation or air conditioning or mechanical ventilation systems to allow windows and doors to remain closed for extended intervals of time so that acceptable interior noise levels can be maintained.

Significance After Mitigation

With implementation of Mitigation Measure NOI-7, potential exterior and interior noise levels at development facilitated by the project would be compatible with the County's exterior noise limit of 60 dB L_{dn} or less in outdoor activity areas and interior noise limit of 45 dB L_{dn} or less with windows and doors closed. Impacts would be less than significant.

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4.14 Population and Housing

This section evaluates impacts to population and housing growth associated with the implementation of the proposed project.

4.14.1 Setting

Population, housing, and employment data are available on a city/town, county, regional, and state level. This Program EIR uses data collected and provided at the town and county level to focus the analysis specifically on unincorporated Sonoma County and on the 11 areas with the Rezoning Sites.

a. Population

As shown in Table 4.14-1, unincorporated Sonoma County had an estimated 2022 population of 132,144 (California Department of Finance [DOF] 2019). Table 4.14-1 also shows population growth in the Unincorporated County since census year 2013. Between 2013 and 2017, the Unincorporated County experienced a population increase, but between 2018 and 2021, the population of the Unincorporated County decreased. This is likely due to the annexation of 714 acres of the Unincorporated County into the city of Santa Rosa in October 2017, subsequent annexations of smaller tracts of land in 2018 and 2019 into other incorporated cities in Sonoma County, as well as the loss of population following the 2017 Sonoma Complex Fires and the 2019 Kincade Fires (County of Sonoma 2020a). The population in the Unincorporated County experienced a population increase in 2022.

Table 4.14-1 Population in Unincorporated Sonoma County (2013 – 2022)

Year	Population	Percent Change from Previous Year
2013	147,330	–
2014	148,487	+ 0.79
2015	149,229	+ 0.50
2016	149,488	+ 0.17
2017	149,781	+ 0.20
2018	143,721	- 4.05
2019	141,781	- 1.35
2020	134,570	- 5.08
2021	131,111	- 2.57
2022	132,144	+ 0.79

Source: DOF 2019; 2022

b. Housing

A household is defined as a group of people who occupy a housing unit (United States Census Bureau 2022). A household differs from a dwelling unit because total dwelling units includes both occupied and vacant dwelling units. Not all the population lives in households; a portion lives in group quarters, such as board and care facilities and others are homeless.

Household Size

Small households (one to two persons per household) traditionally occupy units with zero to two bedrooms; family households (three to four persons per household) normally occupy units with three to four bedrooms. Large households (five or more persons per household) typically occupy units with four or more bedrooms. The number of units in relation to the household size may reflect preference and economics. Many small households obtain larger units and some large households live in small units, for economic reasons.

Table 4.14-2 compares the size of households in the Unincorporated County with Sonoma County as a whole in 2000, 2010, and 2022. The average household size in both the Unincorporated County and Sonoma County as a whole decreased between 2000 and 2010 and decreased again between 2010 and 2022. Overall, the Unincorporated County has maintained a lower average household size than Sonoma County as a whole over the last 22 years.

Table 4.14-2 Households in Unincorporated Sonoma County and the Rest of Sonoma County (as a Whole)

Average Household Size	2000	2010	2022
Unincorporated County	2.57	2.46	2.43
Rest of Sonoma County (incorporated cities)	2.60	2.55	2.53

Source: DOF 2007; 2019; 2022

Housing Units

Table 4.14-3 shows the growth in number of housing units in the Unincorporated County since 2000. Between 2000 and 2010, approximately 3,689 housing units were added to the housing inventory in the Unincorporated County, an average yearly increase in the housing stock of approximately 369 housing units. Between 2010 and 2022, approximately 5,465 housing units were removed from the housing inventory in Unincorporated County areas, an average yearly decrease of approximately 455 units. Similar to the decrease in population in the Unincorporated County during this time, this decrease in housing units is likely due either to annexations of land previously in the Unincorporated County into various incorporated cities in Sonoma County or to the 2017 Sonoma Complex Fires, which destroyed over 2,200 housing units in the Unincorporated County (County of Sonoma 2020b). Additionally, it should be noted that the 2019 Kincade Fire destroyed 374 structures, including 174 residences, and damaged 60 additional structures, including 34 residences (California Department of Forestry and Fire Protection [CAL FIRE] 2019); the Glass Fire of 2020 destroyed 1,555 structures and damaged an additional 282 structures across both Napa and Sonoma counties (CAL FIRE 2020); and the LNU Lightning Complex fires of 2020 destroyed 159 residences and damaged an additional 10 residences in Sonoma County (Graff 2020). Of the 64,807 housing units in the Unincorporated County in 2019, 10,769 units (16.6 percent) were vacant (DOF 2019). There were 1,904 permitted vacation rentals in the County as of June 23, 2020 (County of Sonoma 2020c).

Table 4.14-3 Housing Units in Unincorporated Sonoma County Defined by Units Per Structure

Year	Single Family (Attached Plus Detached)	Multifamily (2 to 4 units)	Multifamily (5+ units)	Mobile Homes	Total Units	Occupied Units
2000	54,764	4,899[a]	—[a]	4,615	64,278	56,602
2010	58,293	2,607	2,425	4,642	67,967	56,951
2022	53,231	2,545	2,463	4,263	62,502	52,755

[a] This number represents all multi-family housing in the Unincorporated County in 2000, without regard to the number of units in the multifamily complex (2 to 4 versus 5+ units).

Source: DOF 2007, 2019; 2022

c. Employment-Housing Ratio

The employment-household ratio in an area is an overall indicator of jobs availability in that area. A balance of jobs and housing is considered beneficial as it has the potential to provide residents the option to work locally and avoid commutes to other places in the region for employment. As shown in Table 4.14-4, 2022 employment in the Unincorporated County was estimated to be 52,800 (California Employment Development Department 2022). Based on this employment estimate and the Unincorporated County's estimated 2022 population, the Unincorporated County's 2022 jobs-housing ratio was 0.85 jobs per household.

Table 4.14-4 Unincorporated Sonoma County 2022 Population, Housing, and Employment and 2040 Projections

Unincorporated Sonoma County	2022	2040 [b]	Change between 2022 to 2040
Population (# of residents)	132,144[a]	160,150	+ 28,006
Housing (# of units)	62,502[a]	60,020	- 6,245
Employment (# of jobs)	52,800[c]	61,595	+ 8,795

[a] Source: DOF 2022

[b] Source: ABAG 2017

[c] Source: California Employment Development Department 2022

A study prepared for the Sonoma County Economic Development Board in 2018 identified a shortage of approximately 20,700 units to accommodate projected household employment and to alleviate overcrowding that occurs in approximately 6 percent of existing housing units (County of Sonoma 2018).

d. Projections

Table 4.14-4 also presents 2040 population, housing, and employment projections for the Unincorporated County. The 2040 projections are based on 2017 data ABAG provided (ABAG 2017)[1], which suggest the Unincorporated County's population will grow by approximately 28,006 new residents, 6,245 new housing units, and 8,795 new jobs by 2040 compared to 2022 levels. This is equivalent to an average annual population growth rate of approximately 1.2 percent through the year 2040 and overall growth from 2022 to 2040 of 21 percent. Additionally, it should be noted that

[1] Although Plan Bay Area 2050 was approved in October 2021, the data used in the analyses and projections were not broken down by individual jurisdiction. As a result, this environmental evaluation uses data supplied by the Plan Bay Area 2040 report.

the 2040 ABAG projections did not account for recent events that have reduced the County's housing stock, including the 2017 Sonoma Complex fires (destruction of over 2,200 housing units); 2019 Kincade Fire (destruction of 374 structures, including 174 residences, and damage to 60 additional structures, including 34 residences); the Glass Fire of 2020 (destruction of 1,555 structures and damage to an additional 282 structures across both Napa and Sonoma counties); and the LNU Lightning Complex fires (destruction of 159 residences and damage to an additional 10 residences in Sonoma County (County of Sonoma 2020b; CAL FIRE 2019, 2020; Graff 2020).

4.14.2 Regulatory Setting

a. State

State Housing Element Law

State housing element statutes (Government Code Sections 65580 through 65589.11) mandate that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law recognizes that for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. As a result, State housing policy rests largely upon the effective implementation of local general plans and, in particular, housing elements. Additionally, Government Code Section 65588 dictates that housing elements must be updated at least once every eight years. Pursuant to State law, the proposed project would result in a Sonoma County Housing Element Update to addresses housing affordability, including Regional Housing Needs Assessment (RHNA) goals. The housing element is required to include an inventory of land suitable and available for residential development to meet the County's RHNA, by income level.

Assembly Bill 1763

Assembly Bill (AB) 1763, effective January 1, 2020, amends the State Density Bonus Law (Section 65915) to allow for taller and denser 100 percent affordable housing developments, especially those near transit, through the creation of an enhanced affordable housing density bonus.

Accessory Dwelling Units: California Government Code Section 65583(c)(7)

California Government Code Section 65583 requires cities and counties to prepare a housing element, as one of the state-mandated elements of the General Plan, with specific direction on its content. Pursuant to Section 65583(c)(7), the Housing Element must develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households.

Replacement Housing: California Government Code Section 65583.2(g)(3)

Pursuant to California Government Code Section 65583.2(g)(3), the Housing Element is required to include a program to impose housing replacement requirements on certain sites identified in the inventory of sites. Under these requirements, the replacement of units affordable to the same or lower income level, consistent with those requirements set forth in State Density Bonus Law (Government Code Section 65915(c)(3)), would be required.

b. Regional and Local

Association of Bay Area Governments Regional Transportation Plan/Sustainable Communities Strategy

As discussed in Section 4.11, *Land Use and Planning*, Sonoma County is in the ABAG/Metropolitan Transportation Commission (MTC) planning area. ABAG/MTC functions as the Metropolitan Planning Organization for Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma counties and the towns and cities within those counties. ABAG/MTC is responsible for implementing Plan Bay Area 2050, the Regional Transportation Plan/Sustainable Communities Strategy (ABAG 2021a). Plan Bay Area 2050 is a long-range integrated transportation and land-use plan for the San Francisco Bay Area through 2050. ABAG/MTC projections for the planning area consider regional, State, and national economic trends and planning policies. ABAG/MTC's 2050 population and housing projections Although Plan Bay Area 2050 was completed and approved in October 2021, the data used in the analyses and projections were not broken down by individual jurisdiction. As a result, this environmental evaluation uses data supplied by the previous Plan Bay Area 2040 report, as shown in Table 4.14-4.

Regional Housing Needs Allocation

California's Housing Element law requires that each county and city develop local housing programs to meet their "fair share" of future housing growth needs for all income groups, as determined by the California Department of Housing and Community Development. The regional councils of government, including ABAG, are then tasked with distributing the State-projected housing growth need for their region among their city and county jurisdictions by income category. This fair share allocation is referred to as the RHNA process. The RHNA determines the minimum number of housing units each community is required to plan for through a combination of 1) zoning "adequate sites" at suitable densities to provide affordability; and 2) housing programs to support production of below-market rate units. The allocation for areas in unincorporated Sonoma County distributed among four income categories, as determined by the 2023-2031 RHNA, is shown in Table 2-1, in Section 2, *Project Description*.

Sonoma County Transportation Authority

The Sonoma County Transportation Authority (SCTA) serves as the coordinating and advocacy agency for transportation funding for Sonoma County. The SCTA acts as the countywide planning and programming agency for transportation related issues. The SCTA plays a leading role in transportation by securing funds, providing project oversight, and initiating long-term planning. To comply with the MTC requirement that local transportation agencies establish transportation plans that can feed into the larger Regional Transportation Plan, SCTA prepared Moving Forward 2050 — the Comprehensive Transportation Plan in September 2021. This comprehensive transportation plan uses ABAG, MTC, DOF, and California Economic Development Department data to forecast future population, housing, and employment in Sonoma County and the cities therein, through 2050. Moving Forward 2050 estimates that population in the County as a whole (including both unincorporated an incorporated areas) is projected to grow by 15 to 20 percent from 2019 to 2050. This is consistent with the ABAG population projections.

4.14.3 Impact Analysis

a. Significance Thresholds and Methodology

Population and housing trends in the County were evaluated by reviewing the most current data available from the DOF and Plan Bay Area 2040. Impacts related to population are generally social or economic in nature. Under CEQA, a social or economic change generally is not considered a significant effect on the environment unless the changes are directly linked to a physical change.

The following thresholds are based on *CEQA Guidelines* Appendix G. For purposes of this EIR, impacts related to population and housing are considered significant if implementation of the proposed project would:

1. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere

For purposes of this analysis, "substantial" population growth is defined as growth exceeding ABAG/MTC population forecasts for the Unincorporated County or exceeding the County's forecasted population and associated housing needs. "Substantial" displacement would occur if allowed land uses would displace more residents than would be accommodated through growth provided by project implementation.

b. Project Impacts and Mitigation Measures

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

Impact PH-1 IMPLEMENTATION OF THE PROJECT WOULD ACCOMMODATE AN ADDITIONAL 8,246 NEW RESIDENTS AND 3,312 NEW HOUSING UNITS IN THE COUNTY. THIS WOULD EXCEED POPULATION AND HOUSING FORECASTS ESTABLISHED IN THE EXISTING GENERAL PLAN, BUT WOULD BE CONSISTENT WITH THE ABAG POPULATION FORECASTS AND THE 6TH CYCLE RHNA FOR THE 2023-2031 PLANNING PERIOD. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

For purposes of this analysis, "substantial" population growth is defined as growth exceeding ABAG/MTC population forecasts for the Unincorporated County or exceeding the County's forecasted population and associated housing needs.

The project proposes to update the County's existing Housing Element Update, which would result in rezoning of sites for medium-density housing throughout urban service areas in the Unincorporated County. Such rezoning would result in an anticipated buildout through 2032. As discussed in Section 2, *Project Description,* full buildout of the project, including the 20 additional inventory sites that would not be rezoned under project implementation, could accommodate an estimated net increase of 8,246 new residents and 3,312 new dwelling units in the County by 2032.

Comparison to the 2020 General Plan

Table 4.14-5 compares buildout from project implementation to allowable buildout under current General Plan designations. As shown in the table, the estimated growth under existing General Plan designations would add 920 new residents and 354 new housing units on these sites. The buildout potential on the Rezone Sites under the proposed project would result in 8,655 new residents and 3,329 new housing units. The buildout potential of the 20 additional inventory sites would result in 511 new residents and 337 new housing units, for a net increase of 8,246 new residents and 3,312 new housing units on all inventory sites. Therefore, population growth in the County facilitated by the project would exceed the population growth forecasted by the 2020 General Plan. The project would encourage development of residential units that would be 840 percent above the 2020 General Plan forecast for the Rezoning Sites, resulting in a County population on the Rezoning Sites that would be 840 percent above the 2020 General Plan forecast for those sites.

Table 4.14-5 Projected Population Growth Through 2032

	Buildout Potential of Rezoning Sites Under Current Designation	Buildout Potential of Rezoning Sites Under Proposed Designation	Net Change in Buildout Potential of Rezoning Sites	Buildout Potential of Other Inventory Sites	Total Net Buildout Potential of Proposed Project
Population (# of residents)	920	8,655	+7,735	511	+8,246
Housing (# of dwelling units)	354	3,329	+2,975	337	+3,312

Source: Table 2-5 in Section 2, Project Description

Comparison to Bay Area 2040

Plan Bay Area 2040 provides development projections until 2040. The projected 2031 population and housing numbers were interpolated from the 2040 projections using the average percent growth per year for the County. Plan Bay Area forecasts the County's population to grow from 144,500 in 2020 to 160,150 by 2040, or approximately 10.8 percent total growth.[2] As such, ABAG forecasts an average annual growth rate of the County's population to be approximately 1.2 percent.[3]

Plan Bay Area 2040 forecasts the County's housing stock to grow from 56,560 in 2020 to 60,020 in 2040, or approximately 6.1 percent total growth.[4] As such, ABAG forecasts an average annual growth rate of the County's housing units of approximately 0.3 percent.[5]

The annual growth rate percentages detailed above were used to determine the 2031 population and housing stock forecasts in unincorporated Sonoma County. Applying the Plan Bay Area 2040 forecast population growth rate, the County's population would increase by approximately 14,272 residents by 2031 for a forecasted population of 146,416.[6] Similarly, applying the Plan Bay Area

[2] Calculation: 15,650 residents divided by 144,500 residents equals 10.8 percent total growth
[3] Calculation: 10.8 percent divided by 20 years equals approximately 0.54 percent
[4] Calculation: 3,460 residential units divided by 56,560 residential units equals 6.1 percent
[5] Calculation: 6.1 percent divided by 20 years equals approximately 0.3 percent.
[6] Calculation: 0.012 times 132,144 residents times 9 years equals 14,272 residents.

2040 forecast housing unit growth rate, the County's housing stock would increase by approximately 1,688 units by 2031 for a forecasted housing stock of 64,190 units.[7]

Table 4.14-6 shows the difference between growth forecasts for ABAG and the growth anticipated under implementation of the proposed project. The population growth under implementation of the project would not exceed ABAG's population growth forecast. However, housing growth under the project would exceed ABAG's forecast by approximately 2.5 percent.

Table 4.14-6 Comparison of Plan Bay Area 2040 Forecast and Project Projections

	Existing Conditions (2022) [a]	Project Growth Accommodation	2031 Conditions Under the Project	ABAG 2032 Forecast	Difference	Percent Difference Between ABAG Forecast
Population	132,144	8,246	140,390	146,416[b]	- 6,026	- 4.2
Housing	62,502	3,312	65,814	64,190[c]	+1,624	2.5

[a] Source: DOF 2022

[b] Population forecast was estimated using the Plan Bay Area 2040 forecast growth rate for the County of 1.2 percent increase per year for 9 years

[c] Housing forecast was estimated using the Plan Bay Area 2040 forecast growth rate for the County of 0.3 percent increase per year for 9 years

Conclusion

The State requires that all local governments adequately plan to meet the housing needs of their communities (HCD 2022), including planning to accommodate RHNA. Given that the State is currently in an ongoing housing crisis due to an insufficient housing supply, the additional units added under the proposed project would further assist in addressing the existing crisis and in meeting the housing needs of the County's residents. Furthermore, the project would first be submitted to the HCD for review and approval to ensure that it would adequately address the housing needs and demands of the County.

The increase in housing units would provide housing opportunities that meet these household income categories, in proximity to jobs for those employed in the County. This would in turn reduce vehicle miles traveled (VMT) and associated impacts related to transportation, air quality, and GHG emissions. Additionally, as described in Section 2, *Project Description*, the Rezoning Sites would direct housing development in General Plan-designated Urban Service Areas throughout unincorporated Sonoma County near existing services and amenities.

Development facilitated by the proposed project is intended to be dispersed throughout the County to create managed and planned levels of growth in specific areas. As discussed in Section 4.14, *Utilities and Service Systems*, the Rezoning Sites are near mostly developed areas supported by existing infrastructure that would be sufficient to serve the additional housing units. The project would not create or require the construction of new roads or major infrastructure, or directly or indirectly induce unplanned population growth.

Although the proposed project would increase the buildout potential beyond that anticipated in the current General Plan, the project would not exceed the ABAG 2040 population projections or the County's housing requirement under the 6th cycle RHNA allocation for the 2023-2031 planning period. Furthermore, as the growth resulting from the project is anticipated and evaluated

[7] Calculation: 0.003 times 62,502 units times 9 years equals 1,688 units.

throughout this Program EIR, and the project would be adopted as an integral part of the County's General Plan following a planning process, the population growth resulting from the project would not be unplanned.

Mitigation Measures

No mitigation measures would be required.

Significance after Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Impact PH-2 DEVELOPMENT FACILITATED BY THE PROJECT COULD DISPLACE EXISTING HOUSING OR PEOPLE, NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Some of the Rezoning Sites contain existing housing or other structures that could be removed during project implementation. However, the proposed project would enable development in the Unincorporated County that could result in a net increase of 3,312 residential units on the Rezoning Sites. One of the fundamental goals of the project is to provide more housing development opportunities throughout the County and meet countywide housing inventory requirements. The project would increase the total buildout potential of the identified Rezoning Sites, thus providing areas for the development of new housing projects consistent with the new zoning designation of these sites. Such a change in zoning to allow for higher density housing could result in the demolition of existing housing, but this would only occur when new housing projects are proposed for that site, and the total number of units on the site would increase. Pursuant to Government Code Section 65583.2(g), sites that currently have residential uses for low or very low-income households that have been vacated or demolished are required to be replaced with units similar to those vacated or demolished. Thus, Mitigation Measure PH-1 requires that replacement housing be made temporarily available for any displaced existing residents prior to the demolition of existing housing on any of the Rezoning Sites.

Mitigation Measure

PH-1 RELOCATION PLAN

For Rezoning Sites that contain existing rental housing that would displace individuals during development, the project applicant shall prepare a relocation plan similar to the requirements of Government Code Section 7260-7277. The relocation plan may include, but not be limited to:

1. Proper notification of occupants or persons to be displaced.
2. Provision of "comparable replacement dwelling" which means decent, safe, and sanitary; and adequate in size to accommodate the occupants.
3. Provision of a dwelling unit that is within the financial means of the displaced person.
4. Provision of a dwelling unit that is not subject to unreasonable adverse environmental conditions.

This measure shall apply to future development projects on Rezoning Sites that may displace individuals and is not limited to development undertaken by a public entity or development that is publicly funded. The County shall approve the relocation plan prior to project approval.

Significance After Mitigation

Mitigation Measure PH-1 would ensure that existing residents on the Rezoning Sites would be provided replacement housing during construction on the Rezoning Sites. This measure would ensure that impacts would be reduced to less than significant.

4.15 Public Services and Recreation

This section assesses impacts associated with public services, including fire and police protection, public schools, libraries, and parks and recreation associated with project implementation. Impacts to water and wastewater infrastructure and solid waste collection and disposal are discussed in Section 4.18, *Utilities and Service Systems*. Impacts regarding wildfires are discussed in Section 4.19, *Wildfire*.

4.15.1 Setting

a. Fire Protection

Fire protection, first response emergency medical services, and natural disaster preparedness services in unincorporated Sonoma County are provided by various fire departments. The Rezoning Sites are protected by the fire protection districts (FPD) identified in Table 4.15-1, below. This table provides the associated FPD and current response times for each grouping of Rezoning Sites.

Table 4.15-1 Rezoning Sites Fire Districts

Site Group	Fire Protection District (FPD)	Average Response Time in Minutes (Data Year)	Response Zone Type
Geyserville	Northern Sonoma County FPD	10:39 (2012)	Rural
Guerneville	Russian River FPD[1]	4:46 (2018)	Rural
Larkfield	Rincon Valley FPD[1]	6:02 (2017)	Rural
Forestville	Forestville FPD[1]	6:06 (2018)	Rural
Graton	Graton FPD	Meets standard[2]	Rural
Santa Rosa	Rincon Valley FPD	6:02 (2017)	Rural
Glen Ellen	Glen Ellen FPD[3]	6:08 (2018)	Rural
Agua Caliente	Sonoma Valley Fire District[3]	5:34 (2018)	Suburban
Penngrove	Rancho Adobe FPD	3:00 (2020)	Rural
Petaluma	Wilmar Volunteer Fire Company	8:00 (2012)	Rural
Sonoma	Schell-Vista FPD	7:49 (2018)	Rural

[!] The Russian River FPD, Rincon Valley FPD, and Forestville FPD were recently consolidated with the Bennett Valley, Bodega Bay, Mountain Volunteer, and Windsor FPDs as the new Sonoma County Fire District; however, the most recent response time data is only available from before this consolidation.

[2] Response times not quantified

[3] The Valley of the Moon FPD and Glen Ellen FPD were recently consolidated with the Mayacamas FPD as the new Sonoma Valley FD.

Sources: County of Sonoma 2021; Sonoma Local Agency Formation Commission 2014, 2018, 2019a, 2019b, 2020; Taylor 2020; Wetzstein 2012

Response Times

The National Fire Protection Association Code Section 1720, Chapter 4, establishes response time goals for areas, based on the urbanization of the response location. For urban areas (more than 1,000 people per square mile), 80 percent of response times should be no longer than nine minutes; for suburban areas (500 to 1,000 people per square mile) the response time should be no more than 10 minutes, and for rural areas (less than 500 people per square mile) the response time should be no more than 14 minutes. For remote areas with a travel distance greater than 8 miles, the

response time correlates directly to the travel distance. The existing response times for fire districts serving the Rezoning Sites are provided in Table 4.15-1, above.

Wildland Fire Hazards

In California, responsibility for wildfire prevention and suppression is shared by federal, state, and local agencies. As shown in Section 4.19, *Wildfire*, the Rezoning Sites are in Local Responsibility Areas and State Responsibility Areas, and are either not in a designated fire hazard severity zone, or are in Moderate fire hazard severity zones in designated State Responsibility Areas (SRA). Section 4.19, *Wildfire*, also provides a description of nearby vegetation and wildfire risk associated with each Rezoning Site.

The State of California utilizes a Mutual Aid system to support any disaster that impacts a community, such a wildfire. Once a request is made, the California Emergency Management Agency contacts counties throughout California to assemble strike teams of fire engines and personnel to respond to the need. Section 4.19, *Wildfire*, addresses regulations and potential impacts related to wildfire, including smoke and subsequent flooding and runoff.

California Department of Forestry and Fire Protection

Preventing wildfires in the SRA is a vital part of the California Department of Forestry and Fire Protection (CAL FIRE) mission. CAL FIRE's Fire Prevention Program consists of multiple activities including wildland pre-fire engineering, vegetation management, fire planning, education, and law enforcement. Typical fire prevention projects include brush clearance, prescribed burns, defensible space inspections, emergency evacuation planning, fire prevention education, fire hazard severity mapping, and fire-related law enforcement activities (CAL FIRE 2020). CAL FIRE also responds to medical aids, hazardous material spills, swift water rescues, search and rescue missions, civil disturbances, train wrecks, floods, earthquakes, and other emergency calls.

b. Police Protection

The County Sheriff's Office provides police protection in the Unincorporated County as well as the Town of Windsor and City of Sonoma. The Sheriff's Office is located at 2796 Ventura Avenue in Santa Rosa, with additional substations in Guerneville, Sonoma, Geyserville (boating unit), and Windsor (Sonoma County Sheriff's Office 2020). The County Sheriff's Office has 628 allocated staff for fiscal year 20122/2023 and serves a population of approximately 500,000 people (Bratton 2022). This results in a service ratio of 1.26 per 1,000 residents.

The California Highway Patrol provides traffic safety and enforcement services on unincorporated roadways and State highways. One California Highway Patrol office is located along Highway 101 in Rohnert Park.

c. Schools

Various school districts serve Sonoma County. The school districts that would serve the Rezoning Sites are identified in Table 4.15-2. The County's school enrollment is projected to decrease by 16.94 percent from 2020-21 to 2030-2031, per California Department of Finance (DOF) data (DOF 2021). These projections are based on current trends in birth rates and migration.

Table 4.15-2 Rezoning Sites School Districts

Site Group	School District	Enrollment Data (2020-21) (number of students)	Projected Enrollment (2030-31) (number of students)
Geyserville	Geyserville Unified	209	174
Guerneville	Guerneville Elementary	460	382
	West Sonoma County Union High	1,851	1,537
Larkfield	Mark West Union Elementary	1,298	1,078
	Santa Rosa City High	10,821	8,988
Forestville	Forestville Union Elementary	267	222
	West Sonoma County Union High	1,851	1,537
Graton	Oak Grove Union Elementary	1,293	1,074
	West Sonoma County Union High	1,851	1,537
Santa Rosa	Bellevue Union Elementary	1,544	1,282
	Santa Rosa City High	10,821	8,988
Glen Ellen	Sonoma Valley Unified	3,950	3,281
Agua Caliente	Sonoma Valley Unified	3,950	3,281
Penngrove	Petaluma City Elementary	2,424	2,013
	Petaluma Joint Union High	5,233	4,347
Petaluma	Petaluma City Elementary	2,424	2,013
	Petaluma Joint Union High	5,233	4,347
Sonoma	Sonoma Valley Unified	3,950	3,281

Notes: Projected Enrollment is calculated assuming a 16.94 percent decrease in enrollment between 2020-21 and 2030-31 in the County (DOF 2021). The actual change in projected enrollment for each district may vary, with an overall average of less 16.94 percent. Data from the DOF was provided at the County level and not at the School District level.

Source: Sonoma County Office of Education 2020; Education Data Partnership 2022

d. Public Libraries

Sonoma County has a centralized regional library system operated as the Sonoma County Library under a Joint Powers Agreement from 1975. The Joint Powers Agreement is between Sonoma County, the incorporated cities of Sonoma County, and the Sonoma County Library. The Library Commission governs the library system and is appointed by the Sonoma County Board of Supervisors, and the cities of Santa Rosa and Petaluma. There are 15 branch libraries: Santa Rosa Central, Cloverdale Regional, Forestville (El Molino High School), Guerneville Regional, Healdsburg Regional, Occidental, Petaluma Regional, Rohnert Park-Cotati Regional, Roseland Community, Santa Rosa Northwest Regional, Sonoma County History and Genealogy, Rincon Valley Regional, Sebastopol Regional, Sonoma Valley Regional, and Windsor. Table 4.15-3 indicates which library or libraries are closest to each grouping of Rezoning Sites.

Table 4.15-3 Library Proximity to Rezoning Sites

Site Group	Nearest Library	Distance from Rezoning Sites (in miles)
Geyserville	Cloverdale Regional	9
Guerneville	Guerneville Regional	<1
Larkfield	Windsor	4
Forestville	Forestville	<1
Graton	Forestville, Sebastopol Regional	4
Santa Rosa	Santa Rosa Central, Roseland Community, Santa Rosa Northwest Regional	3 or 4
Glen Ellen	Sonoma Valley Regional	6
Agua Caliente	Sonoma Valley Regional	<1
Penngrove	Petaluma Regional	5
Petaluma	Petaluma Regional	2
Sonoma	Sonoma Valley Regional	2

Note: Distances rounded up to the nearest mile

Source: Sonoma County Library 2015

The mission of the Sonoma County Library system is to bring information, ideas, and people together to build a stronger community. The system is known nationally for their innovation and locally for their connection to their residents and communities. Their Strategic Plan is broken down into five Components: Customer Experience, Education and Discovery, Innovation, Community Engagement, and Financial Sustainability (Sonoma County Library 2015). During the November 2016 election, 72 percent of the voters in Sonoma County voted to support Sonoma County Library by passing Measure Y to increase sales taxes by an eighth of a cent to maintain, restore, and enhance library services throughout the County.

e. Parks and Recreation

Sonoma County contains federal, state, regional, and local parklands, for a total of 52,864 acres of publicly accessible lands (County of Sonoma 2003). Of this acreage, 12,400 acres are regional, community, and neighborhood parks (Davis-Brown 2020). Based on the County's 2020 population of 488,863 (DOF 2022), the County currently has a countywide park-to-resident ratio of 25.4 acres per 1,000 residents (including regional, community, and neighborhood parks), which is above the County's total park acreage to resident ratio goal of 25 acres per 1,000 residents, per Sonoma County General Plan Policy PF-2c. Table 4.15-4 provides the acreages and types of publicly accessible lands throughout the County per region.[1]

[1] Note that the Sonoma Coast area lands are not included in Table 4.15-4 because none of the Rezoning Sites are located in this area, and future residents of the sites would be most likely to access lands in the same region as the sites.

Table 4.15-4 Sonoma County Publicly Accessible Lands

Type of Land	North County (includes GEY sites)	Sebastopol and Russian River (includes GUE, FOR, GRA sites)	Santa Rosa Plain (includes LAR, SAN sites)	South County (includes PEN, PET sites)	Sonoma Valley (includes GLE, AGU, SON sites)
Federal	14,615	0	0	250	0
State	1,588	4,988	8,936	2,486	879
County	1,134	217	1,791	345	294
Cities	87	96	461	313	48
Local Recreational Districts	7	34	0	0	0
School Districts	88	55	348	361	40
Other Lands	0	8	17	9	72
Total	**17,519**	**5,398**	**11,554**	**3,764**	**1,333**

Source: County of Sonoma 2003

4.15.2 Regulatory Setting

a. Federal Regulations

Disaster Mitigation Act

Section 104 of the Disaster Mitigation Act of 2000 (Public Law 106-390) requires a state mitigation plan as a condition of disaster assistance. There are two different levels of state disaster plans: Standard and Enhanced. States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act has also established new requirements for local mitigation plans.

National Fire Plan

The National Fire Plan was developed under Executive Order 11246 in August 2000, following a landmark wildland fire season. Its intent is to actively respond to severe wildland fires and their impacts to communities, while ensuring sufficient firefighting capacity for the future. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability.

b. State Regulations

California Fire Plan

The Strategic California Fire Plan is the State's roadmap for reducing the risk of wildfire. The plan was updated in 2018 and directs each CAL FIRE unit to prepare a locally specific Fire Management Plan for its area of responsibility. These documents assess the fire situation in each of CAL FIRE's 21 units and six contract counties. The plans include stakeholder contributions and priorities and identify strategic areas for pre-fire planning and fuel treatment, as defined by the people who live and work with the local fire problem. The plans are required to be updated annually.

California State Hazard Mitigation Plan

The purpose of the State of California Multi-Hazard Mitigation Plan (SHMP) is to significantly reduce deaths, injuries, and other losses attributed to natural and human-caused hazards in California. The SHMP provides guidance for hazard mitigation activities emphasizing partnerships among local, state, and federal agencies as well as the private sector. The California Office of Emergency Services prepares the SHMP, and in it identifies risks and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is federally required under the Disaster Mitigation Act of 2000 for the state to receive federal funding.

California Code of Regulations (Title 5)

The California Code of Regulations, Title 5 Education Code, governs all aspects of education in the State, and allows school districts to prepare developer fees.

The School Facilities Act of 1986 (California State Assembly Bill [AB] 2926) was enacted and added to California Government Code (CGC; Section 65995) in 1986. It authorizes school districts to collect development fees, based on demonstrated need, and to generate revenue for school districts for capital acquisitions and improvements. It also established that the maximum fees which may be collected under this and any other school fee authorization are $1.50 per square foot for residential development and $0.25 per square foot for commercial and industrial development.

AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Section 66000 *et seq.* to the CGC code. Under this statute, payment of statutory fees by developers serves as exclusive mitigation under CEQA to satisfy the impact of development on school facilities.

School Facilities Bond Act: California Senate Bill 50 (SB 50)

As part of the further refinement of the legislation enacted under AB 2926, the passage of the School Facilities Bond Act (SB 50) in 1998 defined the needs analysis process in CGC sections 65995.5 through 65998. Under the provisions of SB 50, school districts may collect fees to offset the costs associated with increasing school capacity because of development. SB 50 generally provides for an equal State and local school facilities match and three levels of statutory impact fees. The application level depends on whether State funding is available; whether the school district is eligible for State funding; and whether the school district meets certain additional criteria involving bonding capacity, year-round schools, and the percentage of moveable classrooms in use.

CGC Sections 65995 through 65998 implement AB 2926, as amended by SB 50. In accordance with Section 65995(h), the payment of statutory fees is “deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization…on the provision of adequate school facilities.”

Pursuant to CGC Section 65995(i), “a State or local agency may not deny or refuse to approve a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in section 56021 or 56073 on the basis of a person's refusal to provide school facilities mitigation that exceeds the amounts authorized pursuant to this section or pursuant to section 65995.5 or 65995.7, as applicable.”

California Education Code Section 17620(a)(1) states the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within

the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.

Quimby Act

The Quimby Act (CGC Section 66477) was established by the California Legislature in 1965 to provide parks for growing communities in California. The Act authorizes cities to adopt ordinances addressing park land and/or fees for residential subdivisions for the purpose of providing and preserving open space and recreational facilities and improvements. The Act requires the provision of three acres of park area per 1,000 persons residing in a subdivision, unless the amount of existing neighborhood and community park area exceeds that limit, in which case the county or city may adopt a higher standard not to exceed five acres per 1,000 residents. The Act also specifies acceptable uses and expenditures of such funds. Revenues generated through the Quimby Act cannot be used for the operation and maintenance of park facilities.

c. Regional and Local Regulations

Sonoma County Regulations

The Fire Prevention Division of Permit Sonoma enforces State Fire Safe standards for new residential buildings in unincorporated SRAs. An on-site fire hazard assessment and consultation conducted by Fire Prevention Division staff is required. The staff assessment results in a report describing the minimum requirements for the project's Vegetation Management and Defensible Space Plan.

Sonoma County Code Chapters 7 and 13 require the installation of automatic fire sprinkler systems in all new residential buildings and conditionally require such systems at the time of the expansion of existing residential buildings.

County General Plan

The Sonoma County General Plan was adopted by the Sonoma County Board of Supervisors Resolution 08-0808 on September 23, 2008, and includes broad goals and policies intended to ensure the safety of County residents and ensure adequate provision of public facilities and services to serve the existing and projected County population. Goals and policies from the General Plan are provided below.

PUBLIC SAFETY ELEMENT GOALS AND POLICIES

Goal PS-3: Prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires.

Objective PS-3.2: Regulate new development to reduce the risks of damage and injury from known fire hazards to acceptable levels.

Policy PS-3l: Require automatic fire sprinkler systems or other on-site fire detection and suppression systems in all new residential and commercial structures, with exceptions for detached utility buildings, garages, and agricultural exempt buildings.

Policy PS-3m: Consider additional impact or mitigation fees, or a benefit assessment, to offset the impact of new development on fire services.

PUBLIC FACILITIES AND SERVICES ELEMENT GOALS AND POLICIES

Goal PF-2: Assure that park and recreation, public education, fire suppression and emergency medical, and solid waste services, and public utility sites are available to the meet future needs of Sonoma County residents.

Objective PF-2.6: Integrate fire protection systems into new structures as a means of improving fire protection services through adoption of a County ordinance.

Policy PF-2a: Plan, design, and construct park and recreation, fire and emergency medical, public education, and solid waste services and public utilities in accordance with projected growth, except as provided in Policy LU-4d.

Policy PF-2b: Work with the Cities to provide park and recreation, public education, fire and emergency medical, and solid waste services as well as public utilities. Use proposed annexations, redevelopment agreements, revenue sharing agreements, and the CEQA process as tools to ensure that incorporated development pay its fair share toward provision of these services.

Policy PF-2c: Use the following standards for determination of park needs: Twenty acres of regional parks per 1,000 residents countywide and five acres of local and community parks per 1,000 residents in unincorporated areas. A portion of State parklands may be included to meet the standard for regional parks.

Policy PF-2f**:** Adopt and implement a new Outdoor Recreation Plan with parks and recreation facilities necessary to meet the needs of GP2020.

Policy PF-2g: Require dedication of land or in-lieu fees as a means of funding park and fire services and facilities.

Policy PF-2l: Continue to implement State law pertaining to school impact mitigation that allows for the dedication of land, the payment of fees, or both, as a condition of approval for development projects.

Policy PF-2m: Prepare a Fire Services Master Plan for urban and rural areas in cooperation with the Cities, State, and other fire service agencies. The minimum contents necessary for an adequate master plan are:

1. A statement of objectives, policies and programs,
2. A forecast of growth,
3. Projected fire and emergency medical service needs, and
4. A level of service assessment

Policy PF-2n: Require prior to discretionary project approval written certification that fire and related services customarily provided to comparable uses are available or will be available prior to occupancy for projects within the service area of the applicable fire agency.

Policy PF-2x: Utilize development fees to require that new development pay for its share of needed infrastructure as identified in existing and future Capital Improvement Plans prepared by the County.

LAND USE ELEMENT GOALS AND POLICIES

Goal LU-4: Maintain adequate public services in both rural and Urban Service Areas to accommodate projected growth. Authorize additional development only when it is clear that a funding plan or mechanism is in place to provide needed services in a timely manner.

Objective LU-4.1: Assure that development occurs only where physical public services and infrastructure, including school and park facilities, public safety, access and response times, water and wastewater management systems, drainage, and roads are planned to be available in time to serve the projected development.

Policy LU-4f: Assure that new development contributes its fair share toward provision of the public services and infrastructure needed for projected growth.

OPEN SPACES AND RESOURCE CONSERVATION ELEMENT GOALS AND POLICIES

Goal OSRC-17: Establish a countywide park and trail system that meets future recreational needs of the County's residents while protecting agricultural uses. The emphasis of the trail system should be near urban areas and on public lands.

Objective OSRC-17.1: Provide for adequate parklands and trails primarily in locations that are convenient to urban areas to meet the outdoor recreation needs of the population, while not negatively impacting agricultural uses.

Policy OSRC-17d: The trails on Figure OSRC-3 make up the County's designated plan for trails. Trail locations are approximate and are described below. Roadways may be used where access cannot be obtained through private property.

[…]

1. Russian River Waterway Trail. The Russian River is a navigable waterway from Cloverdale to the coast and as such, public access is protected by Article XV, Section 2 of the California Constitution. This proposed waterway trail extends from the coast to Preston Bridge immediately north of Cloverdale.
2. Valley of the Moon Trail. The proposed trail traverses the Valley of the Moon between Jack London State Park and the Sonoma/Napa County line and links Sonoma Valley Regional Park to the Glen Ellen community.

Policy OSRC-17f: Consider requiring a dedication in fee or by easement for trails as a condition of approval of subdivisions. There must be a need identified on Figure OSRC-3 and the project must either block an existing access or result in the need for additional recreational opportunities. Locate and fence trails to minimize impacts on agricultural uses.

Policy OSRC-17h: Identify and evaluate alternative sites in the Boyes Hot Springs area to meet the projected need for a regional park facility in Sonoma Valley.

4.15.3 Impact Analysis

a. Significance Thresholds and Methodology

The following thresholds are based on *CEQA Guidelines* Appendix G. For purposes of this Program EIR, impacts related to public services and recreation from the project would be significant if implementation of the proposed project would:

1. Result in substantial adverse physical impacts associated with the need for or provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other objectives for:
   a. Fire protection
   b. Police protection
   c. Schools
   d. Parks
   e. Other public facilities
2. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated
3. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment

Additionally, for impacts to be considered significant, development of these public service and recreational facilities would also have to result in a significant physical environmental impact not already analyzed and disclosed in the other resource chapters of this Program EIR.

b. Project Impacts and Mitigation Measures

Threshold:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OF NEW OR PHYSICALLY ALTERED FIRE FACILITIES TO MAINTAIN ACCEPTABLE SERVICE RATIO RESPONSE TIMES OR OTHER OBJECTIVES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 2, *Project Description*, development facilitated by the project would result in up to 3,312 new housing units and an estimated 8,246 new residents in the Unincorporated County, within designated urban service areas. Development facilitated by the proposed project would be designed and constructed to meet all applicable current state and local codes and ordinances related to fire protection. The project would increase the density of development on each Rezoning Site, with new structures and infrastructure constructed to the latest fire and building code safety standards. The increase in population and residential development would generate additional demand for fire protection and emergency services.

As described in Section 4.15.1(a), above, local fire districts are all meeting the National Fire Protection Association response time goals for rural and suburban areas (depending on the location). The addition of new residences on the Rezoning Sites would not involve the construction of any barriers to movement that could prevent the local fire districts from meeting these response time goals. The sites themselves are all within 1.5 miles of the nearest fire station, and emergencies on these sites would be responded to within the response time goals. Refer to Table 4.15-5 for the anticipated increase in population and anticipated response time to each grouping of Rezoning

Sites. As shown therein, the Rezoning Sites could be accessed from the nearest fire stations within the response time goal for the respective district, and would not increase the total population served by more than 10 percent, with the exception of the Forestville sites. Because the sites are located throughout the County, and in urbanized areas where local departments already respond to calls for service, no single fire station would become overburdened by development facilitated by the project. It is not anticipated that the construction of a new fire station would be required to serve future development on any of the sites, due to the location of the Rezoning Sites close to existing fire stations. General Plan Policy PS-3m requires the consideration of payment of impact fees to ensure fire departments are adequately funded to serve new projects, and Sonoma Valley Fire District and Sonoma County Fire District adopted impact fees in 2021 that are collected for the purpose of mitigating impacts caused by new development on each district's infrastructure. Fees are used to finance the acquisition, construction and improvement of public facilities needed as a result of this new development (County of Sonoma 2022a). Additionally, some of the Rezoning Sites are currently developed with uses that require fire protection services, although these uses would be replaced with higher density residential uses following project approval.

Table 4.15-5 Rezoning Sites Demand on Fire Districts

Site Group	Fire Protection District (FPD)	Existing Population Served by FPD	New Population Served Under Project[1]	Percentage Increase in Population Served	Response Time Goal (minutes)	Distance to Farthest Rezoning Site (Estimated Drive Time)[2]
Geyserville	Northern Sonoma County FPD	5,000	268	5.4	14	0.9 mile (3 min)
Guerneville, Larkfield, Santa Rosa, Forestville	Sonoma County Fire District[3]	78,500	5,063	6.5	14	4.4 mile (12 min)
Graton	Graton FPD	7,000	443	6.3	14	1.0 mile (3 min)
Glen Ellen; Agua Caliente	Sonoma Valley Fire District[4]	48,000	570	1.2	14	2.0 mile (9 min)
Penngrove	Rancho Adobe FPD	28,000	562	2.0	14	0.8 mile (3 min)
Petaluma	Wilmar Volunteer Fire Department	4,500	432	9.6	14	1.6 mile (6 min)
Sonoma	Schell-Vista FPD	4,500	197	4.4	14	2.4 mile (4 min)

[1] Calculated based on data provided in Table 2-4 and Table 2-5

[2] Farthest distances used and time calculated assuming 1 minute reaction time

[3] The Russian River FPD, Rincon Valley FPD, and Forestville FPD were recently consolidated with the Bennett Valley, Bodega Bay, Mountain Volunteer, and Windsor FPDs as the new Sonoma County Fire District.

[4] The Valley of the Moon FPD and Glen Ellen FPD were recently consolidated with the Mayacamas FPD as the new Sonoma Valley FD.

Sources: Northern Sonoma County FPD 2021; Sonoma County Fire District 2022; Sonoma LAFCO 2019a; Rancho Adobe FPD 2022; County of Sonoma 2022b; Schell-Vista FPD 2022; National Fire Protection Association Code Section 1720; Taylor 2020

Development facilitated by the project, per the proposed land use and zoning of the Rezoning Sites, would be required to comply with existing laws and regulations regarding fire safety. The following requirements would be applicable to some or all the Rezoning Sites:

1. Compliance with California Fire Code Wildland-Urban Interface (WUI) building standards for sites in the WUI (including the following WUI interface, intermix, and influence zone sites: GEY-1, GUE-1, GUE-2, GUE-3, GUE-4, LAR-7, FOR-2, FOR-3, FOR-4, FOR-5, FOR-6, GRA-1, GRA-2, GRA-3, GRA-5, SAN-1, SAN-2, SAN-3, SAN-5, SAN-7, SAN-8, SAN-9, SAN-10, GLE-1, GLE-2, AGU-1, AGU-2, PEN-2, PEN-4, PEN-6, PEN-7, PET-2, and PET-4)[2]
2. Compliance with the California Fire and Building Code, which applies to construction, equipment, use and occupancy, location, and maintenance of proposed buildings and includes regulations for vegetation and fuel management
3. Compliance with Fire Safe Standards for new residential buildings in SRAs (including the following sites: GUE-1 through GUE-4, GLE-1, GLE-2, PEN-2, PEN-4, and PEN-7)
4. Completion of a fire hazard assessment and consultation by Fire Prevention Division of Permit Sonoma
5. Installation of automatic fire sprinkler systems per Sonoma County Code Chapters 7 and 13 and General Plan Policy PS-3l
6. Payment of impact fees during the building permit process, per Policy LU-4f
7. Approval from the Fire Prevention Division during the building permit process that individual project plans meet the site access requirements and provide the required fire safety features

Therefore, while the project would generate additional demand, it would not substantially reduce existing response times or require the construction of new or altered fire stations and development facilitated by the project would be required to comply with existing regulations regarding fire safety. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OF NEW OR PHYSICALLY ALTERED POLICE FACILITIES TO MAINTAIN ACCEPTABLE SERVICE RATIO RESPONSE TIMES OR OTHER OBJECTIVES. IMPACTS WOULD BE LESS THAN LESS THAN SIGNIFICANT.

Development facilitated by implementation of the proposed project would increase the number of individuals in the Unincorporated County, with associated increases in activity at those sites. This increase in activity level at the sites may deter some crime, as the presence of more people can deter criminal activity. As for police protection services, the increase in population generated by the

[2] Refer to Section 4.19, *Wildfire*, for additional discussion of the WUI in relation to the Rezoning Sites.

project would contribute to greater police service demands, including the need for more police officers. The project would result in up to 8,246 new residents in the Unincorporated County, which would decrease the existing ratio of 1.26 police staff per 1,000 residents to 1.24 staff per 1,000 resident, resulting in a need for 12 police officers to be added to the Sheriff's Office to maintain the existing service ratio. The need for new officers would be distributed throughout the County, with no more than three new officers required at any one station. Therefore, it is not anticipated that the construction of a new police station would be required to serve development on any of the sites. However, General Plan Policy LU-4f requires the payment of fair share impact fees during the building permit process, which fund the provision of public services, including police protection services, based on projected growth. Additionally, some of the Rezoning Sites are currently developed with uses that require police protection services, although these uses would be replaced with higher density residential uses following project approval. In summary, development facilitated by the project would not result in significant environmental impacts.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Impact PS-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OF NEW OR PHYSICALLY ALTERED SCHOOL FACILITIES, AND PURSUANT TO STATE LAW, PAYMENT OF IMPACT FEES TO MITIGATE DEMAND ON SCHOOL FACILITIES WOULD BE REQUIRED. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Students residing at the Rezoning Sites would attend various schools throughout the County, based on the district in which the Rezoning Site occurs. Table 4.15-6, Table 4.15-7, and Table 4.15-8 summarize the projected increase in students from development on the Rezoning Sites.

Table 4.15-6 Elementary School District Capacity Analysis

School District	Associated Rezoning Sites	Number of New Residents[1]	Number of New Students[2]	Projected Enrollment (2030-31)[3]	Projected Change in Enrollment(from 2020-21 to 2030-31)[3]
Guerneville Elementary	Guerneville	616	41	382	-78
Mark West Union Elementary	Larkfield	528	35	1,078	-220
Forestville Elementary	Forestville	1,484	99	222	-45
Oak Grove Elementary	Graton	443	29	1,074	-219

School District	Associated Rezoning Sites	Number of New Residents[1]	Number of New Students[2]	Projected Enrollment (2030-31)[3]	Projected Change in Enrollment(from 2020-21 to 2030-31)[3]
Bellevue Elementary	Santa Rosa	2,636	175	1,282	-262
Petaluma City Elementary	Penngrove, Petaluma	994	66	2,013	-411

[1] Based on Table 2-5, Change in Total Allowable Dwelling Units (Buildout Potential) column (Section 2, *Project Description*)

[2] Based on an elementary school student generation rate of 6.64 age 5 to 10 children per an increase of 100 people (US Census Bureau 2018)

[3] Based on Table 4.15-2 data

Table 4.15-7 High School District Capacity Analysis

School District	Associated Rezoning Sites	Number of New Residents[1]	Number of New Students[2]	Projected Enrollment (2030-31)[3]	Projected Change in Enrollment (from 2020-21 to 2030-31)[3]
Santa Rosa City High	Larkfield, Santa Rosa	3,164	258	8,988	-1,833
West Sonoma County Union High	Guerneville, Forestville, Graton	2,543	208	1,537	-314
Petaluma Joint Union High	Penngrove, Petaluma	994	81	4,347	-886

[1] Based on Table 2-5, Change in Total Allowable Dwelling Units (Buildout Potential) column (Section 2, *Project Description*)

[2] Based on a high school student generation rate of 8.16 age 11 to 18 children per an increase of 100 people (US Census Bureau 2018)

[3] Based on Table 4.15-2 data

Table 4.15-8 Unified School District (K-12) Capacity Analysis

School District	Associated Rezoning Sites	Number of New Residents[1]	Number of New Students[2]	Projected Enrollment (2030-31)[3]	Projected Change in Enrollment (from 2020-21 to 2030-31)[3]
Geyserville Unified	Geyserville	268	40	174	-35
Sonoma Valley Unified	Glen Ellen, Agua Caliente, Sonoma	767	114	3,281	-669

[1] Based on Table 2-5, Change in Total Allowable Dwelling Units (Buildout Potential) column (Section 2, *Project Description*)

[2] Based on a school student generation rate of 14.8 age 5 to 18 children per an increase of 100 people (US Census Bureau 2018)

[3] Based on Table 4.15-2 data

As shown in Table 4.15-6, Table 4.15-7, and Table 4.15-8, based on school-age population statistics provided by the United States Census Bureau, development facilitated by the project would generate approximately 1,145 school-aged children across 11 school districts in the County. The generation rates used for this analysis are considered conservative, as it assumes all school-age children would attend public schools and does not account for private schools or homeschooling.

Laws would require the project applicant(s) of any development facilitated by the project to pay school impact fees at the time building permits are issued. These fees are used by Sonoma County School Districts to mitigate impacts associated with long-term operation and maintenance of school facilities. The applicant's fees would be determined at the time of the building permit issuance and

would reflect the most current fee amount requested by the applicable district. Pursuant to Section 65995(h) of the CGC, payment of these fees "is deemed to be full and complete mitigation of impacts of any legislative or adjudicative act, or both, involving but not limited to, the planning, use, or development of real property, or any change in government organization or reorganization."

Furthermore, based on the projected decline in enrollment across school districts serving the Rezoning Sites and the estimated 1,145 new school-aged children that would result from development associated with rezoning under implementation of the project, most of the school districts would be able to absorb new and incoming students because the increases in the student population are not greater than the anticipated decreases in enrollment (with the exception of Forestville Elementary and Geyserville Unified School Districts). Therefore, impacts to schools are considered less than significant without mitigation.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?
Threshold:	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
Threshold:	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impact PS-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED PARKS, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES, OR OTHER OBJECTIVES AND WOULD NOT INCREASE THE USE OF EXISTING NEIGHBORHOOD AND REGIONAL PARKS SUCH THAT SUBSTANTIAL PHYSICAL DETERIORATION OF THE FACILITY WOULD OCCUR OR BE ACCELERATED. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Sonoma County currently has 12,400 acres of land designated as regional, community, and neighborhood parks and recreation facilities (Davis-Brown 2020). Based on the County's 2020 population of 488,863 (DOF 2022), the County currently has a countywide park-to-resident ratio of 25.4 acres of regional, community, and neighborhood parks per 1,000 residents.

Development facilitated by the project would increase demand and use of existing park and recreational facilities, resulting in approximately 8,246 new residents throughout the County. Development facilitated by the project would result in a total countywide population of 497,109 people, and a total park-to-resident ratio of approximately 24.9 acres of regional, community, and neighborhood park space per 1,000 residents. As such, the County would fall short of its park ratio goal of 25 acres of regional, community, and neighborhood parks per 1,000 residents countywide

(per General Plan Policy PF-2c). To address this shortage, the County requires payment of in-lieu fees to fund park facilities (per Sonoma County Code Section 20-65) offsetting any impacts related to increased demand at existing recreation facilities, and project applicant(s) of the Rezoning Sites would be required to pay this during the permit approval process. Therefore, the project is not anticipated to result in the need for new or physically altered parks or recreational facilities and would not result in substantial physical deterioration of existing parks.

Project implementation would not place demands on existing or future parks or recreational facilities such that substantial physical deterioration would occur. While existing and future parks would need periodic maintenance, the increased demand for parks and other recreational facilities would not outpace routine maintenance. Also, the project would not require construction of new parks or recreational facilities. Impacts would therefore be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact PS-5 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OF NEW OR PHYSICALLY ALTERED LIBRARY OR OTHER PUBLIC FACILITIES TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES, OR OTHER OBJECTIVES, AND THE PAYMENT OF PROPERTY TAXES FUNDING LIBRARY OR OTHER PUBLIC FACILITIES WOULD BE REQUIRED. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would introduce approximately 8,246 new residents, which would be expected to increase library service utilization rates. Property taxes fund the county libraries, which development facilitated by the project would be required to pay, similar to other residential properties in the County. Approximately 44 percent of county residents have library cards with the Sonoma County Library system (Sonoma County Library 2015). Thus, it can be conservatively anticipated that library services would increase by approximately 3,628 additional registrants (44 percent of the projected new residents) because of project implementation. These additional registrants would visit their local library branch, check out items, and participate in library events, but such increased demand for library services would not necessarily compel the construction of a new or expanded library facility in the County due to the wide dispersal of demand across various library facilities in the County. The Rezoning Sites are located throughout the County, and increased demand would be spread across the Sonoma County Library system to the appropriate branch libraries closest to each site, as identified in Table 4.15-3. Therefore, the increase in demand at any one branch library is not anticipated to require new or expanded library facilities. Because adequate existing and planned facilities are available, development facilitated by the project would not require construction of new or expanded library facilities. This impact would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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4.16 Transportation

This section analyzes the impacts of the proposed project on transportation, including conflicts with transportation plans, vehicle miles traveled (VMT), project-related transportation hazards, and emergency access. The information provided in this section was primarily based on a Transportation Assessment authored by Fehr & Peers, included as Appendix TRA to this EIR.

4.16.1 Setting

a. Existing Street Network

Regional

Regional access to the Rezoning Sites is provided by freeways and State highways, including State Route 1, State Route 128, State Route 116, State Route 12, State Route 121, State Route 37, and U.S. Highway 101 (Highway 101). Figure 2-1, Figure 2-2, Figure 2-3, Figure 2-4, Figure 2-6, Figure 2-7, and Figure 2-9 provide visuals for the proximity of these roadways to the Rezoning Sites.

Other Principal Arterials

Guerneville Road, located west of the City of Santa Rosa, is an east to west arterial with one automobile lane in each direction. The street connects Cleveland Avenue in the City of Santa Rosa to State Route 116. A bicycle lane is on both sides of the street. The speed limit on Guerneville Road in the Unincorporated County is 55 miles per hour (mph).

Leveroni Road, located southwest of the City of Sonoma, is an east to west arterial with one automobile lane in each direction. The street connects Arnold Drive to State Route 12. The speed limit on Leveroni Road is 55 mph.

Napa Road, located southeast of the City of Sonoma, is a west to southeast arterial with one lane in each direction and a center lane for turning in either direction. The street connects State Route 12 at the southernmost boundary of the City of Sonoma and extends to the intersection of Napa Road and State Route 12. The speed limit on Napa Road is 55 mph.

Minor Arterials

Arnold Drive, located southwest of the City of Sonoma, is a north to south arterial with one automobile lane in each direction. The street connects State Route 116 south of the intersection with Watmaugh Road and ends at State Route 12 east of its intersection with Dunbar Road. The speed limit on Arnold Drive is 40 mph.

Adobe Road, located northeast of the City of Petaluma, is a north to south arterial with one automobile lane in each direction. A bicycle lane is on both sides of the street, which connects from the intersection of Old Adobe Road and State Route 116 and extends north to the intersection of Old Adobe Road and Old Redwood Highway North. The speed limit is 50 mph.

Petaluma Boulevard, located within the City of Petaluma, is a north to south arterial with two automobile lanes in each direction. The street connects from the intersection of Petaluma Boulevard south and Fire Road and connects with Old Redwood Highway to the north. The speed limit is 35 mph.

Santa Rosa Avenue, located within and extending south of the City of Santa Rosa, is north to south arterial with one lane in each direction and a center lane. A bicycle lane is on both sides of the street, which connects from Roberts Lake Road and ends at the intersection of Santa Rosa Avenue and 3rd Street in the City of Santa Rosa. The speed limit is 35 mph.

Old Redwood Highway, located north of the City of Santa Rosa, is a north to south arterial with one lane in each direction. The street connects from the intersection of Highway 101 off-ramp and Old Redwood Highway southeast of Rohnert Park and then extends to Healdsburg Avenue to the north. There are bicycle lanes on both sides of the street. The speed limit is 45 mph.

Mark West Springs Road, located east of the Fulton and Larkfield areas, is a north to south arterial with one lane in each direction. The street connects from the intersection of Highway 101 and Mark West Springs Road and ends at the intersection of Mark West Springs Road and Leslie Road. A bicycle lane is on both sides of the road where it passes through the project area. The speed limit is 40 mph.

Rohnert Park Expressway, located within the City of Rohnert Park, is an east to west arterial with one lane in each direction. A bicycle lane is on both sides of the street. The street connects from the intersection of Stony Point Road and Rohnert Park Expressway and ends at the intersection of Rohnert Park Expressway and Petaluma Hill Road. The speed limit is 40 mph.

Major Collectors

D Street, located within the City of Petaluma, is a north to south collector with one lane in each direction. A bicycle lane is on both sides of the street, which connects at its intersection with San Antonio Road and ends at the intersection of D Street and Payran Street. The speed limit is 35 mph.

Bodega Avenue, located within the City of Petaluma, is an east to west collector with one lane in each direction. A bicycle lane is on both sides of the street. The street extends from its intersection with Spring Hill Road to its intersection with Howard Street. The speed limit is 35 mph.

Old Adobe Road, located northeast of Petaluma, is a north to south collector with one lane in each direction and a bicycle lane on both sides of the street. The street extends from its intersection with Rates Road and Adobe Road to its intersection with Old Redwood Highway. The speed limit is 50 mph, but drops to 35 mph in residential and commercial areas.

Skillman Lane, located west of the City of Petaluma, is an east to west collector with one lane in each direction. The street extends from its intersection with Petaluma Boulevard North to its intersection with Bodega Avenue. The speed limit is 35 mph, except in school zones where the speed limit is 25 mph.

Stony Point Road, partially located within the City of Petaluma, is a north to south collector with one lane in each direction and a bicycle lane on both sides of the street. The street extends from its intersection with Petaluma Boulevard North and to its intersection with West College Avenue. The speed limit is 55 mph.

Mecham Road, located south of the City of Cotati, is a north to south collector with one lane in each direction and a bicycle lane on both sides of the street. The street extends from its intersection with Stony Point Road to its intersection with Pepper Road. The speed limit is 45 mph.

Pepper Road, located south of the City of Cotati, is an east to west collector with one lane in each direction and a bicycle lane on both sides of the street. The street extends from its intersection with Stony Point to its intersection with Bodega Avenue. The speed limit is 45 mph.

Valley Ford Road, located northwest of Petaluma, is an east to west collector with one lane in each direction and a bicycle lane on both sides of the street. The street extends from its intersection with Bodega Avenue and connects with State Route 1. The speed limit is 45 mph.

Tomales Road, located northwest of Petaluma, is an east to west collector with one lane in each direction. The street extends from its intersection with Valley Ford Road to its intersection with State Route 1. The speed limit is 45 mph.

Petaluma Hill Road, portions of which are located within Santa Rosa, is a north to south collector with one lane in each direction, a center turn lane, a bicycle lane in each direction, and parallel parking on both sides of the street. The street extends from its intersection with Old Redwood Highway to its intersection with Santa Rosa Avenue. The speed limit is 35 mph.

Crane Canyon Road, located south of Santa Rosa, is an east to west collector with one lane in each direction, a center turn lane, and a bicycle lane in each direction. The street connects its intersection with Petaluma Hill Road and extends to Grange Road. The speed limit is 35 mph.

Bennett Valley Road, located southeast of Santa Rosa, is a north to south collector with one lane in each direction. The street extends from its intersection with Warm Springs Road to its intersection with Santa Rosa Avenue. The speed limit is 45 mph.

Llano Road, located east of Sebastopol, is a north to south collector with one lane in each direction and a bicycle lane on both sides of the street. The street connects from the intersection with State Route 116 and ends at the intersection with State Route 12. The speed limit is 50 mph.

Occidental Road, located in Sebastopol, is an east to west collector with one automotive lane and a bicycle lane in each direction. The street extends from its intersection with Stony Point Road to its intersection with Cherry Ridge Road. The speed limit is 45 mph.

Bohemian Highway, located north of the City of Occidental, is a north to south collector with one lane in each direction. The street extends from its intersection with Bodega Highway to its intersection with State Route 116. The speed limit is 35 mph.

Guerneville Road, located west of the City of Santa Rosa, is an east to west collector with one lane in each direction. The street extends from Highway 101 to its intersection with State Route 116. The speed limit is 55 mph.

River Road, located northwest of the City of Santa Rosa, is an east to west collector with one lane in each direction and a bicycle lane in each direction. The street extends from Highway 101 and connects with State Route 116. The speed limit is 55 mph.

Porter Creek Road, located northeast of the City of Santa Rosa, is an east to west collector with one lane in each direction. The street extends from its intersection with Petrified Forest Road and transitions into Mark West Springs Road. The speed limit is 45 mph.

Petrified Forest Road, located west of the City of Calistoga, is a north to south collector with one lane in each direction. The street extends from its intersection with Porter Creek Road to its intersection with State Route 128. The speed limit is 50 mph.

Chalk Hill Road, located north of the City of Santa Rosa, is a north to south collector with one lane in each direction. The street connects from its intersection with Pleasant Avenue to its intersection with State Route 128. The speed limit is 40 mph.

Westside Road, located west of the Town of Windsor, is a north to south collector with one lane in each direction. The road connects from River Road and extends to Highway 101 in Healdsburg. The speed limit is 45 mph.

Eastside Road, located west of the Town of Windsor, is a north to south collector with one lane in each direction. The road extends from its intersection with Mark West Station Road to its intersection with Old Redwood Highway. The speed limit is 45 mph.

Dry Creek Road, located north of the City of Healdsburg, is a north to south collector with one lane in each direction and a bicycle lane in each direction. The road extends from its intersection with Dry Creek Road to its connection with Stewarts Point – Skaggs Springs Road. The speed limit is 50 mph.

Stewarts Point-Skaggs Springs Road, located west of the City of Geyserville, is a north to south collector with one lane in each direction. The road connects from the termination of Dry Creek Road and extends through Stewart's Point where it terminates. The speed limit is 30 mph.

Minor Collectors

Ramal Road, located in Unincorporated County, southeast of the City of Sonoma, is a north to south collector with one lane in each direction. The road connects from its intersection with State Route 12 to its intersection with Wharf Road. The speed limit is 40 mph.

Chileno Valley Road, located southwest of the City of Petaluma, is an east to west collector with one lane in each direction. The road extends from its intersection with Western Avenue to its intersection with Tomales Road. The speed limit is 50 mph.

Roblar Road, located west of the City of Cotati, is an east to west collector with one lane in each direction. The road extends from its intersection with Stony Point Road to its intersection with Valley Ford Road. The speed limit is 45 mph.

Bloomfield Road, located south of Sebastopol, is a north to south collector with one lane in each direction. The road extends from its intersection with Valley Ford Road to its intersection with State Route 116. The speed limit is 45 mph.

Todd Road, located south of Santa Rosa, is an east to west collector with one lane in each direction. The road connects from the Highway 101 off-ramp and ends at its intersection with Old Gravenstein Highway. The speed limit is 40 mph.

Trinity Road, located north of Glen Ellen, is an east to west collector with one lane in each direction. The road extends from its intersection with Dunbar Road and terminates at the connection to Dry Creek Road. The speed limit is 40 mph.

Laguna Road, located east of unincorporated Forestville, is a north to south collector with one lane in each direction and a bicycle lane on each side of the street. The road extends from its intersection with Guerneville Road and connects with Trenton Road. The speed limit is 45 mph.

Vine Hill Road, located east of unincorporated Forestville is a north to south collector with one lane in each direction. The road extends from its intersection with State Route 116 and terminates at its intersection with Laguna Road. The speed limit is 40 mph.

Trenton Road, located east of unincorporated Forestville, is an east to west collector with one lane in each direction. The road begins at a split from River Road and extends to its intersection with Ritchurst Place. The speed limit is 35 mph.

Wohler Road, located north of unincorporated Forestville, is a north to south collector with one lane in each direction. The road begins at the intersection with Westside Road and ends at the intersection with River Road. The speed limit is 35 mph.

Franz Valley Road, located north of Santa Rosa, is a north to south collector with one lane in each direction and narrows to a single lane. The road begins at the intersection with State Route 128 and ends at the intersection with Porter Creek Road. The speed limit is 35 mph.

Fort Ross Road, located east of Timber Cove, is an east to west collector with one lane in each direction and narrows to a single lane. The road begins at the intersection with State Route 1 and ends at the intersection with Cazadero Highway. The speed limit is 25 mph.

Geysers Road, located east of Cloverdale, is a north to south collector with one lane in each direction. The road begins at an off-ramp of Highway 101 and ends at the connection to State Route 128. The speed limit is 45 mph.

Dutcher Creek Road, located south of Cloverdale, is a north to south collector with one lane in each direction and a bicycle lane in each direction. The road begins at its intersection with Kelly Road and ends at its intersection with Dry Creek Road. The speed limit is 45 mph.

Transit Access and Circulation

Sonoma-Marin Area Rail Transit (SMART) provides rail service in southern and central Sonoma County. Sonoma County Transit offers bus service for the Rezoning Sites, supplemented by Golden Gate Transit and Mendocino County Transit Authority. A variety of city transit services also operate in the vicinity of the Rezoning Sites.

SONOMA-MARIN AREA RAIL TRANSIT

SMART provides passenger rail service for Marin and Sonoma counties. The 45-mile system includes stations in the Sonoma County Airport area, and in Santa Rosa, Rohnert Park, Cotati, Petaluma, Novato, San Rafael, and Larkspur. The SMART system also includes a bicycle and pedestrian pathway along the rail corridor (SMART 2022). Ridership counts between January and September 2019, totaled approximately 390,000 boardings for weekday travel and approximately 66,000 boardings for weekend travel. There were approximately 2,000 boardings per day during weekday travel and approximately 800 boardings per days during weekend travel. Cumulative total weekday passenger miles for the same timeframe were 7,857,740 and cumulative total weekend passenger miles were 1,354,640. (SMART 2020). The SMART rail lines and service are planned to expand through the areas of Windsor, Healdsburg, Cloverdale, and north Petaluma. Construction of the Windsor extension began in 2020. None of the Rezoning Sites are within 0.5-mile of a SMART station.

SONOMA COUNTY TRANSIT

Sonoma County Transit provides local and intercity public transportation services within Sonoma County on 15 routes, as described in Table 4.16-1.

In addition, Sonoma County Transit provides four shuttle routes with connections to SMART (Sonoma County Transportation Authority [SCTA] 2022). City bus services, including Santa Rosa City Bus and Petaluma Transit, provide additional transit services to the cities of Santa Rosa and Petaluma. The Santa Rosa City Bus has 13 fixed routes with buses that connect to SMART, as well as additional paratransit options (City of Santa Rosa 2021). Petaluma Transit has six fixed routes and

provides service to four public junior and high schools, in addition to paratransit options (Petaluma Transit 2016).

Table 4.16-1 Sonoma County Transit Authority Zones

Route	Destinations
10	Cotati, Rohnert Park, Sonoma State University
12	Northern Rohnert Park
14	Northern Rohnert Park
20	Russian River Area, Forestville, Sebastopol, Santa Rosa
26	Sebastopol, Cotati, Rohnert Park
28	Guerneville, Monte Rio
30	Santa Rosa, Sonoma Valley
32	Sonoma Valley
34	Santa Rosa, Sonoma
40	Sonoma, Petaluma
42	Santa Rosa, Industry West Business Park
44	Petaluma, Santa Rosa Junior College, Sonoma State University, Santa Rosa
48	Santa Rosa, Rohnert Park, Cotati, Petaluma
60	Cloverdale, Healdsburg, Windsor, Santa Rosa
62	Santa Rosa, County Airport

Source: SCTA 2022

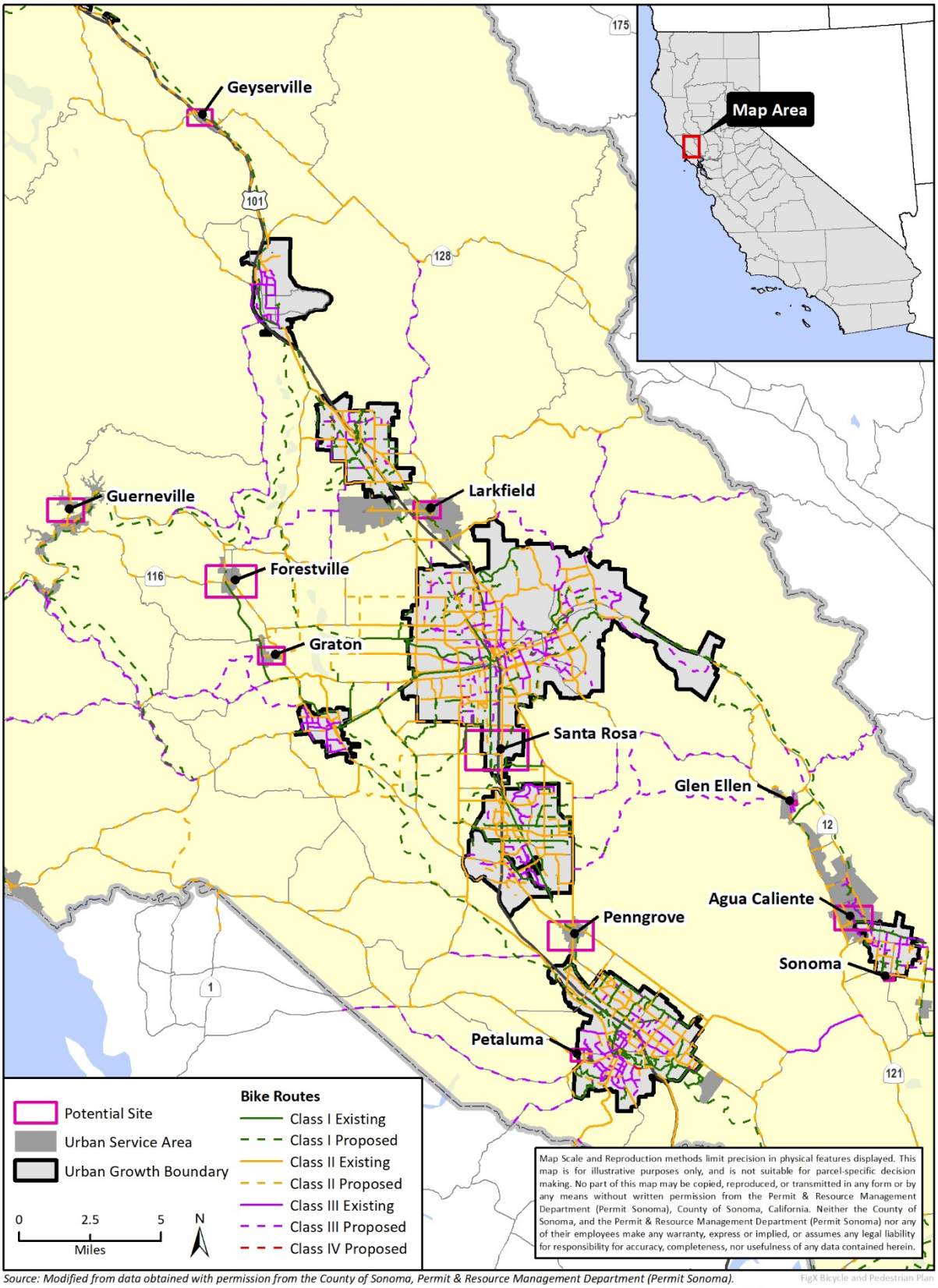
BICYCLE CONDITIONS

Based on the *County of Sonoma Bicycle and Pedestrian Plan* (County of Sonoma 2010), bicycle facilities are classified into several types, including:

1. ***Class 1 Multi-Use Paths*** – provide a completely separated, exclusive right-of-way for bicycling, walking, and other non-motorized uses.
2. ***Class 2 Bicycle Lanes*** – are striped, preferential lanes for one-way bicycle travel on roadways. Some Class 2 bicycle lanes include striped buffers that add a few feet of separation between the bicycle lane and traffic lane or parking aisle.
3. ***Class 3 Bicycle Routes*** – are signed bicycle routes where riders share a travel lane with motorists. Bicycle boulevards (Class 3E) are a special type of Class 3 bicycle route where the shared travel way has low motor vehicle volumes and low speed that prioritize convenient and safe bicycle travel through traffic calming strategies, wayfinding signage, and traffic control adjustments.
4. ***Class 4 Bicycle Routes*** – are on-street bike lanes that are buffered from traffic using physical barriers, such as curbs, planters, or parked cars.
5. ***Unpaved Recreational Trails*** – are trails that facilitate pedestrian and bicycle travel but are not included in the bikeways network.

There are approximately 257 miles of built bicycle infrastructure in unincorporated Sonoma County. Class 2 facilities are the dominant form of built bicycle infrastructure. Figure 4.16-1 provides a map of the existing and proposed bicycle routes within Sonoma County.

Figure 4.16-1 Existing and Proposed Bicycle Routes



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri.

PEDESTRIAN FACILITIES

Pedestrian facilities include sidewalks, crosswalks, and pedestrian signals. Historic downtown areas such as those located in Sonoma, Sebastopol, Petaluma, Cotati, Santa Rosa, Windsor, Healdsburg, and Cloverdale have long-established, central areas where pedestrians can reach a variety of destinations. Sidewalks are in place in almost all recently built residential, civic, and business developments. System gaps exist between older and newer development. Discontinuous sidewalks are also present in the County's unincorporated towns, and most rural roads lack sidewalks and have a shoulder area for pedestrians to walk on. Barriers to safe pedestrian travel include freeways and high-speed and multiple-lane arterials.

4.16.2 Regulatory Setting

a. State

California Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law. SB 743 changed the way transportation impact analysis is conducted as part of CEQA compliance. These changes eliminated automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA.

Prior rules treated automobile delay and congestion as an environmental impact. Instead, SB 743 requires the *CEQA Guidelines* to prescribe an analysis that better accounts for transit and reducing greenhouse gas emissions. In November 2017, Office of Planning and Research (OPR) released the final update to *CEQA Guidelines* consistent with SB 743, which recommend using vehicle miles traveled (VMT) as the most appropriate metric of transportation impact to align local environmental review under CEQA with California's long-term greenhouse gas emissions reduction goals. The *Guidelines* require all jurisdictions in California to use VMT-based thresholds of significance by July 2020.

California Department of Transportation (Caltrans)

Caltrans is the owner and operator of the state highway system, which includes facilities in and around Sonoma County. In its Vehicle Miles Traveled-Focused Transportation Impact Study Guide (TISG; 2020), Caltrans developed an approach for evaluating the transportation impacts of land use projects and plans on state highway facilities; this document does not address the impacts of transportation projects (Caltrans 2020). In accordance with current CEQA requirements, the TISG does not consider vehicle delay in its evaluation of transportation impacts, instead focusing on VMT. The purposes of the TISG include providing guidance to lead agencies regarding when they should analyze potential impacts to the state highway system; to aid Caltrans staff in reviewing projects; and to ensure consistency in the assessment of impacts and identification of non-capacity increasing mitigation measures.

b. Regional

Most of the federal, State, and local financing available for transportation projects is allocated at the regional level by MTC, the transportation planning, coordinating, and financing agency for the nine-county Bay Area. Integrated with the Association of Bay Area Governments' (ABAGs) regional land use plan, the current regional transportation plan, Plan Bay Area 2050, was adopted by MTC and ABAG in October 2021. Plan Bay Area 2050 is both the Bay Area's Regional Transportation Plan (RTP)

as well as its Sustainable Communities Strategy (SCS). Plan Bay Area grew out of the California Sustainable Communities and Climate Protection Act of 2008, which requires each of California's 18 metropolitan areas to reduce GHG emissions from cars and light trucks. Accordingly, Plan Bay Area 2050 recommends increasing non-auto travel mode share and reducing VMT per capita and per employee through promoting transit-oriented development, as well as investments in transit and active transportation modes. These strategies seek to not only improve mobility within the region, but also reduce regional and statewide GHG emissions.

b. Local

Sonoma County Transportation Authority

The SCTA is governed by a twelve-member Board of Directors with three representatives chosen by the Sonoma County Board of Supervisors and one representative from each of the nine cities – Cloverdale, Cotati, Healdsburg, Petaluma, Rohnert Park, Santa Rosa, Sebastopol, Sonoma, and Windsor. The SCTA acts as the countywide planning and fund programming agency for transportation and performs a variety of important functions related to advocacy, project management, planning, finance, grant administration, and research. The SCTA helps implement transportation projects throughout Sonoma County, which includes highways, roads, public transit, and active transportation – such as bike and pedestrian paths and trails.

The passage of Measure M, the Traffic Relief Act for Sonoma County, by Sonoma County voters in 2004 and extended by voters in 2020 provided for a 0.25-cent sales tax collected to be used to maintain local streets, fix potholes, accelerate the widening of Highway 101 for High Occupancy Vehicle lanes, improve local street operations, restore and enhance transit services, support the development of passenger rail service, and build safe bicycle and pedestrian routes. The funds are dedicated towards specific programs and projects specified in the voter approved Expenditure Plan.

The programs and projects contained in the Expenditure Plan are based upon the 2016 Comprehensive Transportation Plan developed by SCTA. The Comprehensive Transportation Plan identified goals to improve and maintain all modes of transportation related to the movement of people and goods.

County of Sonoma General Plan

The Circulation and Transit Element of the Sonoma County General Plan (2016) contains the following objectives and policies relevant to the proposed project:

> **Objective CT-1.2:** Supplement the Highway 101 and SMART rail corridors with improvements designed to provide east/west access to these corridors.
>
> **Objective CT-1.5:** Reduce greenhouse gas emissions by minimizing future increase in VMT, with an emphasis on shifting short trips by automobile to walking and bicycling trips.
>
> **Objective CT-1.6:** Require that circulation and transit system improvements be done in a manner that, to the extent practical, is consistent with community and rural character. Minimizes disturbance of the natural environment, minimizes air and noise pollution, and helps reduce greenhouse gas emissions.
>
> **Objective CT-1.7:** Reduce travel demand countywide by striving to provide a jobs/housing balance of approximately 1.5 jobs per household and encourage creation of jobs and housing in urbanized areas along the SMART passenger rail corridor and other transit centers.

Objective CT-1.8: Improve demand for transit by development of a growth management strategy encouraging projects in urbanized areas that decrease distance between jobs and housing, increase the stock of affordable housing, and increase density.

Policy CT-1b: Focus commute and through traffic onto Highway 101. Designate major arterial routes to serve primarily as connectors between urban areas.

Policy CT-1c: Work with the Cities to provide locations for jobs, housing, shopping, and coordination of location of transit along the Highway 101 corridor to reduce the volume of traffic on east/west corridors.

Policy CT-1d: Work with the Cities to provide jobs, housing, shopping, and coordination of local transit along the SMART passenger rail corridor to reduce the need for automobile travel to and from work and shopping centers.

Policy CT-1e: Support development, implementation, and operation of a passenger rail system and contiguous north south pedestrian and bicycle path along the SMART passenger rail corridor including the funding necessary to support a multi-modal feeder system.

Policy CT-1k: Encourage development that reduces VMT, decreases distances between jobs and housing, reduces traffic impacts, and improves housing affordability.

Policy CT-2f: Require discretionary development projects to provide bicycle and pedestrian improvements and gap closures necessary for safe and convenient bicycle and pedestrian travel between the project and the public transit system.

Policy CT-2v: Require discretionary development projects, where nexus is identified, to provide crossing enhancements at bus stops, recognizing that many transit riders have to cross the street on one of the two-way commutes.

Policy CT-2w: Increase the convenience and comfort of transit riders by providing more amenities at bus stops, including adequately-sized all-weather surfaces for waiting, shelters, trash cans, bike racks, and pedestrian-sized lighting. Required that these improvements be provided as part of nearby public or private development projects.

Policy CT-3c: The Sonoma County Bicycle and Pedestrian Advisory Committee (BPAC) shall be responsible for advising the Board of Supervisors, Planning Commission, Board of Zoning Adjustments, Project Review Advisory Committee, and County staff on the ongoing planning and coordination of the County's bicycle and pedestrian transportation network.

Policy CT-3d: The Regional Parks Department shall be responsible for establishing and maintaining Class I bikeways, and the Department of Transportation and Public Works (TPW) shall be responsible for establishing and maintaining Class II and III bikeways and pedestrian facilities along public rights-of-way in unincorporated areas.

Policy CT-3v: Where nexus exists, require private or public development to plan, design, and construct bicycle and pedestrian facilities to integrate with the existing and planned bicycle and pedestrian network.

Policy CT-3oo: Require new development in Urban Service Areas and unincorporated communities to provide safe, continuous, and convenient pedestrian access to jobs, shopping and other local services and destinations. Maintain consistency with City standards for pedestrian facilities in Urban Service Areas that are within a City's Sphere of Influence or Urban Growth Boundary.

Policy CT-3pp**:** Require pedestrian-oriented street design in Urban Service Areas and unincorporated communities.

SCTA Countywide Bicycle and Pedestrian Master Plan

The SCTA Countywide Bicycle and Pedestrian Master Plan, most recently revised in 2014, is a comprehensive countywide approach to maintaining and improving the transportation system by prioritizing, coordinating, and maximizing funding. The plan emphasizes cooperation among all jurisdictions within the SCTA region and is intended to coordinate the development of facilities proposed by each jurisdiction's individual plans to provide a seamless regional bicycle and pedestrian network (SCTA 2014).

Sonoma County Bicycle and Pedestrian Master Plan

The Sonoma County Bicycle and Pedestrian Plan (2010) establishes goals, objective, policies, and project priorities for the bicycle and pedestrian network in unincorporated Sonoma County. The plan intends to make bicycling and walking in the County safe, comfortable, and convenient to meet an overarching goal of increasing the use of non-motorized transportation.

4.16.3 Impact Analysis

a. Significance Thresholds

To determine whether a project would result in a significant impact to air quality, *CEQA Guidelines* Appendix G requires consideration of whether a project would:

1. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);
3. Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
4. Result in inadequate emergency access

b. Methodology

Section 15064.3 of the *CEQA Guidelines* provides that vehicle miles traveled (VMT) is the most appropriate metric for the analysis of transportation impacts under CEQA.

VMT measures the amount of driving that a project generates. For example, a project generating 100 total (inbound and outbound) vehicle trips per day with an average of 5.0 miles per trip results in 500 project-generated VMT per day. For the purposes of analyzing transportation impacts of residential projects, the VMT generated by the project is converted to an efficiency metric by dividing the amount of VMT generated by the number of residents. Efficiency metrics are used in VMT analysis because the goal of the analysis is to show whether or not a particular development would generate low enough VMT to aid the State in meeting its climate targets relative to projected growth in population, employment, etc.

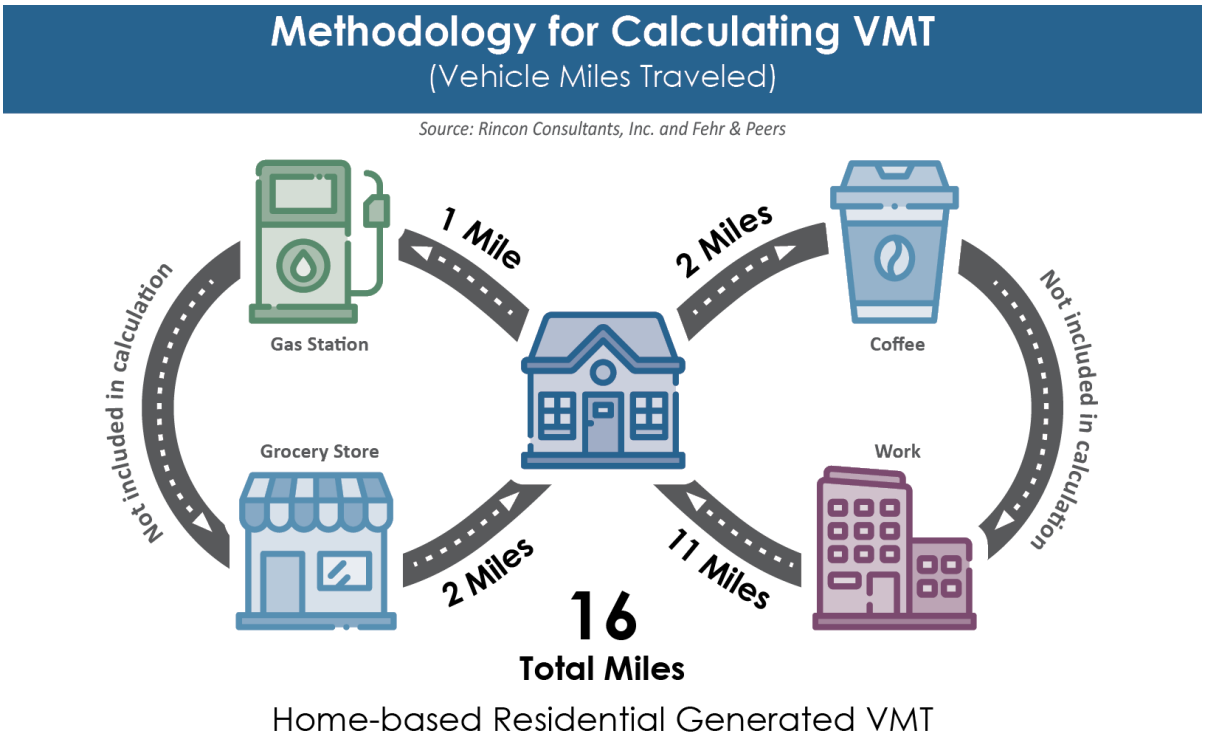
The Governor's OPR provided guidance in its *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) on performing the analysis of VMT and what thresholds of significance could be applied. Based on the guidance in the *Technical Advisory*, the VMT analysis of the proposed project uses the following approach: the metric is total weekday home-based VMT per resident; the method used is the SCTA countywide travel demand model based on Plan Bay Area 2040; the threshold used is 15 percent below regional baseline (nine-county Bay Area) total weekday home-based VMT per resident and impacts were evaluated against the near-term baseline

(i.e., a cumulative analysis, or analysis of the project's impacts in combination with other nearby projects in the future, is not required). Home-based VMT per resident is calculated as the sum of mileage from vehicle trips with a start or end at a residence divided by the number of residents per household. Figure 4.16-2 shows a generic methodology for calculating VMT and illustrates how home-based VMT per resident considers some, but not all, of the amount of driving a person does during the day.

The *Technical Advisory* notes that for land use projects or programs in the unincorporated areas of a county that are included in a metropolitan planning organization (MPO) region (here, the nine-county San Francisco Bay Area), the threshold should be based on (1) the region (i.e., MPO region) VMT per capita or (2) the aggregate population-weighted VMT per capita of all incorporated cities and towns in the region (i.e., MPO).

The use of a threshold based on the nine-county Bay Area region is consistent with the Metropolitan Transportation Commission (MTC) metropolitan planning organization (MPO) boundary. Consistency with the MTC boundary promotes consistency with SB 375 greenhouse gas emission targets, which are set at the MPO level. Other potential thresholds for the project, including those set at the Sonoma County-wide level, may be inconsistent with the substantial evidence developed by OPR and would require additional evidence to demonstrate that an alternative threshold would be sufficient to allow Sonoma County to make progress towards State-mandated climate-related goals, policies and legislation.

Figure 4.16-2 Methodology for Calculating VMT



The SCTA model used in this analysis (summer 2020) reflects a Year 2015 base year and incorporates "Big Data" trip length estimates at the model gateways (refer to Appendix TRA for more information on the use of Big Data). Big Data information was provided by Streetlight Data, which collects approximately 40 billion anonymous location records per month from smartphones and navigation

devices in connected cars and trucks. The incorporation of Big Data trip length estimates provides a more precise understanding of the length of trips that occur beyond the County boundary and alleviates the trip length truncation issues associated with earlier versions of the model. Thus, the use of the SCTA model allows for the estimation of trip lengths (and VMT) into Mendocino and Lake counties, in addition to other counties in the nine-county Bay Area region. New housing units were modeled assuming 90 percent of the units would be multi-family housing, and the remaining 10 percent would be single-family housing. These assumptions, while conservative, did not materially affect the outcomes of the VMT analysis.

Based on data from MTC Travel Model One, the value of the nine-county Bay Area average total home-based VMT per resident is 15.3. The threshold of 15 percent below this regional baseline value is 13.0.

Data from MTC Travel Model One was used to set the threshold as it provides a more complete understanding of total weekday home-based residential VMT per resident for the entire nine-county Bay Area. The SCTA travel demand model was used to evaluate the project's effect on VMT as the SCTA model provides additional land use and roadway network detail in Sonoma County (beyond that available in the MTC model) and also provides coverage of project VMT in Lake and Mendocino counties through the use of Big Data-informed trip lengths at the County boundary. This split-model analysis method is conservative as the SCTA model typically results in a higher amount of VMT estimated for a given project versus using the MTC model; while the SCTA model has been shown to produce higher VMT estimates than the MTC model, the difference between the VMT estimates is relatively small, thus there is little material effect on the CEQA impact analysis conclusion(s).

The near-term baseline conditions (i.e., Existing Conditions) referred to in this section reflect conditions that prevailed prior to the COVID-19 pandemic, which substantially affected transportation conditions in the study area during Spring and Summer 2020. The VMT data, traffic counts, and other data used for the evaluation were collected prior to the pandemic. Subsequent forecasts of future conditions are based on models and predictions that do not account for the current, or potential on-going effects the pandemic may have on transportation demand. As the predominant effects of the pandemic have been an overall decrease in travel activity in the project area, this analysis provides a conservative estimate of transportation conditions.

c. VMT Screening Criteria

VMT screening is a process related to reviewing the location and operating parameters of land use projects and programs to determine if a project or program does not need to perform a VMT analysis because it is presumed to generate a low amount of VMT. The *Technical Advisory* provides several potential screening criteria for identifying projects that are presumed to cause a less than significant transportation impact and accordingly do not need to perform a VMT analysis, including:

1. Development in a low VMT-generating area per the SCTA travel model
2. Development located within a 0.5-mile walkshed of an existing major transit stop or existing stop along a high-quality transit corridor (defined in PRC 21064.3 and 21155)
3. Development in infill locations that are (1) 100 percent affordable
4. Small developments that generate or attract fewer than 110 trips per day

Given the programmatic nature of the project, all Rezoning Sites were incorporated into the VMT analysis, even though some sites might, if considered individually, meet the third (100 percent

affordable) or fourth (small developments) criterion above and be screened out from further analysis.

c. Project Impacts and Mitigation Measures

Threshold:	Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
Threshold:	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact TRA-1 THE ADDITION OF VEHICLE MILES TRAVELED (VMT) BY DRIVERS COMING FROM DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN AN EXCEEDANCE OF VMT THRESHOLDS AND CONFLICT WITH POLICIES SEEKING TO REDUCE VMT IN SONOMA COUNTY. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Vehicle Miles Traveled (VMT)

A low VMT-generating area is defined in the *CEQA Guidelines: Technical Advisory* as an area that is currently below the relevant threshold VMT level. The VMT threshold for identification as a low VMT-generating area would be an area where VMT is approximately 15 percent lower than existing per-capita light duty vehicle travel. Most Rezoning Sites under consideration do not meet the low VMT-generating area definition in the SCTA travel model. Depending on the type of development proposed for the Rezoning Sites, some projects may qualify for the affordable infill housing exemption or other CEQA exemptions, and some developments may be sufficiently small that they would not generate more than 110 trips per day, or propose 100 percent affordable residential development. For example, development facilitated by the project on GLE-2, LAR-4, PEN-1, and PEN-3 would generate less than 110 vehicle trips per day if they were to be built out at the maximum proposed density. Other development facilitated by the proposed project may not qualify for the affordable infill housing exemption or be small enough to generate fewer than 110 vehicle trips per day. The remaining 55 sites would not meet the VMT screening criteria, as described below.

Data on home-based VMT per resident from the summer 2020 version of the SCTA model were output for the base year (Year 2015), base year plus project, cumulative (Year 2040), and cumulative plus project scenarios. Data from project-affected traffic analysis zones in the model were considered as part of the analysis. The results are presented in Table 4.16-2. As noted previously, estimates of VMT from the SCTA travel demand model are conservative versus the thresholds set using data from MTC Travel Model One.

Table 4.16-2 Home-Based Residential VMT per Resident Analysis

Scenario	Total Home-Based VMT per Resident	Threshold Value[1]	Significant Impact?
Base Year (Year 2015)	16.4	N/A	N/A
Base Year + Project	16.0	13.0	**Yes**
Cumulative (Year 2040)	14.8	N/A	N/A
Cumulative + Project	14.8	13.0	**Yes**

Notes: [1] Threshold value is determined as 15 percent below regional (nine-county Bay Area) baseline total weekday home-based VMT per resident using data from MTC Travel Model One. This threshold is based on the *CEQA Guidelines: Technical Advisory* which states that for land use projects or programs located in unincorporated areas of a county that is included in an MPO region (as Sonoma County is), the threshold should be based on (1) the region (i.e., MPO) VMT per capita or (2) the aggregate population weighted VMT per capita of all incorporated cities and towns in the region (i.e., MPO).

Source: Fehr & Peers, July 2020

Under the base year and base year plus project scenarios, average total home-based VMT per resident would decrease minimally with implementation of the project. However, the VMT per resident with implementation of the project would be 16.0, which is greater than the threshold value of 13.0. Additionally, the net change VMT value for the additional residential units would be about 14.7, which would be higher than the threshold, and would be a significant impact and mitigation measures would be required.

Public Transit Facilities

As noted in Section 4.16.1, *Setting*, the Rezoning Sites are not within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor, and do not meet the requirements for transit proximity or low VMT-generating areas.

The project would not cause significant adverse impacts to fixed-route service. The project would not conflict with plans, policies, ordinances, or regulations pertaining to public transit. Ridership on area transit lines is not expected to exceed available capacities with the addition of demand associated with development facilitated by the project.

Bicycle Facilities

The project proposes no features that would be hazardous to bicycles, nor is it forecast to generate bicycle demand that would exceed the capacity of the area's bicycle network. Development facilitated by the project would not introduce a substantial number of vehicles to roadways and thus, would not create features hazardous to bicycles. No features are proposed by the project that would conflict with County or regional plans, policies or ordinances pertaining to bicycle facilities or travel. No significant impacts to bicycle facilities would occur.

Pedestrian Facilities

Development facilitated by the project would propose no features that would be hazardous to pedestrians, nor is it forecast to generate pedestrian demand that would exceed the capacity of the area's pedestrian network. In addition, in compliance with the County of Sonoma's General Plan, development facilitated by the project would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks. No features are proposed that would conflict with County or regional plans, policies or ordinances pertaining to pedestrian facilities or travel. No significant impacts to pedestrian facilities would occur.

Air Traffic Patterns

Airports in Sonoma County include the Charles M. Schulz Sonoma County Airport, the Cloverdale Municipal Airport, the Healdsburg Municipal Airport, the Petaluma Municipal Airport, the Sonoma Skypark Airport, and the Sonoma Valley Airport. None of the Rezoning Sites are in an airport influence area[1]. Therefore, the project would not conflict with an airport land use compatibility plan. No significant impacts to air traffic patterns would occur.

Construction Traffic

Project-related demolition, excavation, grading, and construction of the Rezoning Sites would occur over an unspecified timeline to construct residential units. Due to the large-scale geographic spread of the Rezoning Sites, and uncertainty regarding their buildout schedules, Mitigation Measure TRA-2 would be required to reduce construction related traffic impacts.

Mitigation Measures

The following will be required as a supplemental condition of approval for projects on the Rezoning Sites in order to reach a 11.5 percent reduction in VMT, which is required to meet a VMT value below the 13.0 base year plus project threshold value.

TRA-1 TRANSPORTATION DEMAND MANAGEMENT PROGRAM

Prior to the issuance of building permits, the project applicant shall develop a Transportation Demand Management (TDM) program for the proposed project, including any anticipated phasing, and shall submit the TDM program to Permit Sonoma for review and approval. The TDM program shall identify trip reduction programs and strategies. The TDM program shall be designed and implemented to achieve trip reductions as required to reduce daily VMT and vehicle trips forecast for the project by 11.5 percent from the base year plus project value to reach the threshold value of 13.0, or other local threshold if one is later adopted, or a state or regional body provides more recent guidance.

Trip reduction strategies that may be included in the TDM program include, but are not limited to, the following:

1. Provision of bus stop improvements or on-site mobility hubs
2. Pedestrian improvements, on-site or off-site, to connect to nearby transit stops, services, schools, shops, etc.
3. Bicycle programs including bike purchase incentives, storage, maintenance programs, and on-site education program
4. Enhancements to countywide bicycle network
5. Parking reductions and/or fees set at levels sufficient to incentivize transit, active transportation, or shared modes
6. Cash allowances, passes, or other public transit subsidies and purchase incentives
7. Enhancements to bus service
8. Implementation of shuttle service
9. Establishment of carpool, bus pool, or vanpool programs

[1] The area around each County of Sonoma airport where current or future airport-related noise, over flight, safety, and/or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses (County of Sonoma 2020).

10. Vanpool purchase incentives
11. Low emission vehicle purchase incentives/subsidies
12. Compliance with a future County VMT/TDM ordinance, if eligible
13. Participation in a future County VMT fee program
14. Participate in future VMT exchange or mitigation bank programs

TRA-2 CONSTRUCTION TRAFFIC MANAGEMENT PLAN

To mitigate potential impacts and disruptions during project construction, the applicant shall submit a Construction Traffic Management Plan for County review and approval. The plan shall include, but not be limited to, the following:

1. A prohibition on all construction truck activity during the period 30 minutes prior to the beginning of school and 30 minutes after the end of the school day.
2. The provision of flaggers at all on-site locations where construction trucks and construction worker vehicles conflict with school vehicle, bicycle, or pedestrian traffic.
3. Preservation of emergency vehicle access.
4. Identification of approved truck routes in communication with the County.
5. Location of staging areas and the location of construction worker parking.
6. Identification of the means and locations of the separation (i.e., fencing) of construction areas.
7. Provision of a point of contact for incorporated and unincorporated Sonoma County residents to obtain construction information, have questions answered and convey complaints.
8. Identification of the traffic controls and methods proposed during each phase of project construction. Provision of safe and adequate access for vehicles, transit, bicycles, and pedestrians. Traffic controls and methods employed during construction shall be in accordance with the requirements of the Manual of Uniform Traffic Control Devices (Federal Highway Administration, 2009 Manual on Uniform Traffic Control Devices with Revisions 1 and 2, May 2012).
9. Provision of notice to relevant emergency services, thereby avoiding interference with adopted emergency plans, emergency vehicle access, or emergency evacuation plans.
10. Maintenance of bicycle and pedestrian access along the project's driveway for the duration of project construction.

Significance After Mitigation

Mitigation Measure TRA-1 would reduce home based VMT per resident. However, the reduction would not be sufficient to reduce impacts to less than significant.[2] TDM effectiveness research indicates that the implementation of all feasible TDM measures in suburban and rural environments would result in a maximum effectiveness of 10 percent (CAPCOA 2010). Implementation of Mitigation Measure TRA-1 would reduce impacts, but not below the significance threshold, and therefore impacts would remain significant and unavoidable.

Mitigation Measure TRA-2 would reduce impacts associated with construction traffic to Rezoning Sites to a less than significant level.

[2] The mitigation measure would need to result in the 11.5 percent reduction required to reach a VMT value below the 13.0 base year plus project threshold value. It cannot be guaranteed that any of these measures would result in that percentage reduction.

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

Impact TRA-2 THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY INCREASE HAZARDS DUE TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT). THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by implementation of the project could include interim and long-term modifications to public rights-of-way, such as lane closures during construction or the addition of new driveways and sight distance issues as a result of development. Such modifications could affect transportation safety. However, any modifications to public rights-of-way would be required to be consistent with appropriate regulations and design standards set forth by the County's applicable plans, programs, and policies.

The design of development facilitated by the project is not known at this time. Each development project would be reviewed by the County and required to be consistent with appropriate regulations and design standards set forth by applicable plans, programs, and policies. The proposed project would increase residential uses in Unincorporated County adjacent to agricultural uses, but application of the County's required agricultural buffers as described in Section 4.2, *Agriculture and Forestry Resources*, would reduce this impact, because it would help minimize the conflicts between farm equipment and passenger vehicles on local roadways by requiring buffers between the agricultural and residential uses. In addition, General Plan Policies CT-2v and CT-2w provide for urban and community design that prioritizes pedestrian safety; and General Plan Policies CT-3c and CT-3d include provisions for traffic safety as part of the implementation of traffic calming measures or local community design guidelines. Therefore, consistency with County policies on traffic safety and agricultural buffers would ensure that the project would not because it would not substantially increase hazards due to design features or incompatible uses.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold:	Would the project result in inadequate emergency access?

Impact TRA-3 THE PROPOSED PROJECT WOULD NOT RESULT IN INADEQUATE EMERGENCY ACCESS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As described in Section 4.15, *Public Services and Recreation*, the project would result in an increase in population and development. Development facilitated by the project would be required to meet all applicable current state and local codes and ordinances related to fire protection, including emergency access.

All of the Rezoning Sites are within 1.5 miles of a fire station and are in existing fire service areas. Compliance with Mitigation Measures WFR-1 and WFR-2 in Section 4.19, *Wildfire*, would reduce wildfire risk associated with construction of Rezoning Sites. In addition, development facilitated by the project would be required to provide adequate accommodation of fire access to structure

frontages and, depending on the size of the development, multiple access points to development on Rezoning Sites, per 2019 California Building Code requirements, as well as relevant portions of the Sonoma County Fire Safety Ordinance, codified in Chapter 13 of the Sonoma County Code or the State Fire Safe Regulations, if applicable. Developments that do not meet required standards and codes would not be permitted. Therefore, there would be adequate emergency service and access to the Rezoning Sites and the project would not cause a significant impact on emergency access.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

This impact would be less than significant without mitigation.

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4.17 Tribal Cultural Resources

The analysis in this section has been prepared in accordance with CEQA Guidelines Section 15064.5 and considers potential impacts to tribal cultural resources (TCR). This section includes a brief summary of TCR background information and a summary of consultation conducted by the County with local Native American Tribes. Potential impacts to cultural resources are addressed in Section 4.5, *Cultural Resources*.

4.17.1 Setting

Sonoma County lies within an area traditionally occupied by the Coast Miwok, Western Pomo, and Wappo. Each of these groups is discussed in further detail below.

a. Coast Miwok

Coast Miwok territory is centered on Marin and Sonoma Counties, extending roughly from Duncan's Point south to Point Bonita, with the inland boundary east of the Sonoma River (Kelly 1978:414; Kroeber 1925:443). The Miwok Language consists of two dialect groups, the southern, or Marin group, and the western, or Bodega group (Kelly 1978:414).

The pre-contact Coast Miwok inhabited villages made up of conical dwellings, semi-subterranean sweathouses, and dance houses (Kelly 1978:417). Each village had a chief to oversee village affairs and social and ceremonial life was organized around moieties, or dichotomous groups, classed as either Land or Water (Kelly 1978:419).

Coast Miwok subsistence was based on hunting, gathering, and fishing (Kelly 1978: 415-417). Dried acorns and kelp were primary food sources during the winter and early spring when food was scarce. Coast Miwok relied heavily on nearshore fish and shellfish and on fish from rivers, marshes, and the bay. Hunting focused on deer, elk, bear, and small game. The material culture of the Coast Miwok included clamshell disk beads as currency, and a variety of stone tools, shell ornaments, ceremonial artifacts, and baskets (Kelly 1978: 417-418).

b. Pomo

Southern Pomo territory extends roughly from Gualala south to Duncan's Point, east to the Russian River (McLendon and Oswalt 1978). Southern Pomo is one of several Pomo dialect groups.

The Pomo were organized into a series of independent tribelets ranging in size from 100 to 2,000 people, with the most significant social unit being the kin group (Bean and Theodoratus 1978: 293). The Pomo participated in a clamshell disk bead exchange system internally and among other groups (Bean and Theodoratus 1978: 298).

Pomo subsistence was based on hunting, gathering, and fishing, with acorns as a primary staple (Bean and Theodoratus 1978: 293). Other important plant resources included Buckeye nuts, berries, and seeds from approximately 15 types of grasses, roots, and bulbs. Big game included deer, elk, and antelope. Material culture included obsidian and chert tools, intricate basketry, and bone and shell implements (Bean and Theodoratus 1978: 291).

c. Wappo

Wappo territory includes a small area on the southern edge of Clear Lake and a larger area extending from Cloverdale and Middletown in the north to Napa and Sonoma in the south (Sawyer 1978: 257).

The primary sociopolitical unit consisted of the village led by a chief (Sawyer 1978: 258). Villages included oval houses made of grass thatch. Wappo material culture consisted of stone, shell, and bone tools. Basketry was also important. Additionally, the Wappo participated in the clamshell bean trade and traded in magnesite cylinders (Sawyer 1978: 261).

Wappo subsistence focused primarily on acorn, dried seaweed, and a variety of roots and grasses. Important game included ducks, geese, and quail. Fishing and shellfish gathering were also important, with critical species including abalone, clam, mussels, eels, turtles, chub, and salmon (Saywer 1978: 261).

4.17.2 Regulatory Setting

a. Assembly Bill 52

As of January 1, 2015, California Assembly Bill 52 of 2014 (AB 52) expanded CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment" (PRC Section 21084.2). It states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a TCR, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1) defines TCRs as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and meets either of the following criteria:

a) Listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code (PRC) section 5020.1(k), or
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also established a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be adopted or certified. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency. As of the date of publication of this Program EIR, consultation has not been requested.

b. Senate Bill 18

California Government Code Section 65352.3 (adopted by Senate Bill SB 18, 2002) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or substantially amend a general or specific plan, or designate open space The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the Native American Heritage Commission. As noted in the

California Office of Planning and Research's Tribal Consultation Guidelines (2005), "The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

4.17.3 Tribal Consultation

The County of Sonoma prepared and mailed AB 52/SB 18 notification letters on November 2, 2021 to tribes listed by the Native American Heritage Commission. No requests for consultation under AB 52 or SB 18 were received.

4.17.4 Impact Analysis

a. Significance Thresholds and Methodology

According to CEQA Guidelines Appendix G, an impact on Tribal Cultural Resources from the proposed project would be significant if the following applies:

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

b. Project Impacts and Mitigation Measures

Threshold:	Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?
Threshold:	Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

Impact TCR-1 DEVELOPMENT FACILITATED BY THE PROJECT HAS THE POTENTIAL TO IMPACT TRIBAL CULTURAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

TCRs are known to exist across the County of Sonoma. Development facilitated by the project has the potential to adversely impact tribal cultural resources. Impacts to tribal cultural resources would

be less than significant with implementation of mitigation measures, conducted when appropriate in tandem with the mitigation measures included in Section 4.5, *Cultural Resources*.

Mitigation Measures

TCR-1 TRIBAL CULTURAL RESOURCES COORDINATION AND CONSULTATION

If during the implementation of Mitigation Measure CUL-1, archival research results in the identification of an association between a historical built-environment resource and a local (traditionally and culturally affiliated) California Native American tribe, the qualified architectural historian or historian shall confer with the local California Native American tribe(s) on the implementation of Mitigation Measure CUL-2. Throughout the implementation of Mitigation Measures CUL-3 through CUL-9, the qualified archaeologist retained to implement the measures shall confer with local California Native American tribe(s) on the identification and treatment of tribal cultural resources and/or resources of Native American origin not yet determined to be tribal cultural resources through AB 52 consultation. If, during the implementation of Mitigation Measures CUL-3 through CUL-9, a resource of Native American origin is identified, the County shall be notified immediately in order to open consultation with the appropriate local California Native American tribe(s) to discuss whether the resource meets the definition of a tribal cultural resource.

TCR-2 AVOIDANCE OF TRIBAL CULTURAL RESOURCES

Development facilitated by the project shall be designed to avoid known tribal cultural resources. Any tribal cultural resource within 60 feet of planned construction activities shall be fenced off to ensure avoidance. The feasibility of avoidance of tribal cultural resources shall be determined by the County and applicant in consultation with local (traditionally and culturally affiliated) California Native American tribe(s).

TCR-3 TRIBAL CULTURAL RESOURCES PLAN

A tribal cultural resources Plan shall be required for Rezoning Sites identified as potentially sensitive for tribal cultural resources during consultation with local (traditionally and culturally affiliated) California Native American tribe(s) during the implementation of TCR-1 and/or by the qualified archaeologist during the implementation of CUL-3 through CUL-9. Prior to any development facilitated by the project that would include ground disturbance, the project applicant or its consultant shall prepare a tribal cultural resources treatment plan to be implemented in the event an unanticipated archaeological resource that may be considered a tribal cultural resource is identified during construction. The plan shall include any necessary monitoring requirements, suspension of all earth-disturbing work in the vicinity of the find, avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the local Native Americans and, if applicable, a qualified archaeologist. Examples of appropriate treatment for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, and heritage recovery. As appropriate, the tribal cultural resources treatment plan may be combined with any Extended Phase I, Phase II, and/or Phase III work plans or archaeological monitoring plans prepared for work carried out during the implementation of Mitigation Measures CUL-4, CUL-6, CUL-7, or CUL-8. The plan shall be reviewed and approved by the County and the appropriate local California Native American tribe(s) prior to construction to confirm compliance with this measure.

TCR-4 NATIVE AMERICAN MONITORING

For Rezoning Sites identified as potentially sensitive for tribal cultural resources through consultation with local California Native American tribe(s) during the implementation of TCR-1, and/or identified as sensitive for cultural resources of Native American origin by the qualified archaeologist during the implementation of CUL-3 through CUL-9, the project applicant shall retain a traditionally and culturally affiliated Native American monitor to observe all ground disturbance, including archaeological excavation, associated with development facilitated by the project. Monitoring methods and requirements shall be outlined in a tribal cultural resources treatment plan prepared under Mitigation Measure TCR-3. In the event of a discovery of tribal cultural resources, the steps identified in the tribal cultural resources plan prepared under Mitigation Measure TCR-3 shall be implemented.

TCR-5 SENSITIVE LOCATION OF HUMAN REMAINS

For any development facilitated by the project where human remains are expected to be present based on the results of tribal consultation during the implementation of TCR-1 and/or as identified by the qualified archaeologist, the County shall consult with local California Native American tribe(s) on the decision to employ a canine forensics team. If appropriate, the County shall require the use of a canine forensics team to attempt to identify human remains in a noninvasive way (e.g., non-excavation) for the purpose of avoidance, if avoidance is feasible (see Mitigation Measure TCR-2). Any requirements for the use of a canine forensics team shall be documented in the tribal cultural resources treatment plan prepared under Mitigation Measure TCR-3. Pending the results of any canine investigations, the tribal cultural resources treatment plan may require revision or an addendum to reflect additional recommendations or requirements if human remains are present.

Significance After Mitigation

Implementation of Mitigation Measures TCR-1 through TCR-5 would reduce impacts to TCRs from development facilitated by the project to less than significant levels.

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4.18 Utilities and Service Systems

This section assesses impacts to utilities and service systems, including water, wastewater, stormwater, electricity, natural gas, telecommunications, and solid waste services, associated with project implementation. This section incorporates the Water and Sewer Study completed by Wood Rodgers in August 2022, included as Appendix WSS.

4.18.1 Setting

a. Water Supply

Various water districts provide water supply service in unincorporated Sonoma County. The Rezoning Sites are served by the water districts identified in Table 4.18-1.

Table 4.18-1 Rezoning Sites Water Providers and Water Supply Sources

Site Group	Water Provider	Water Supply Source
Geyserville	California American Water – Geyserville	Unknown[1]
Guerneville	Sweetwater Springs Water District (GUE-1) California Water Service – Armstrong Valley (GUE-2 through GUE-4)	Local wells
Larkfield	California American Water – Larkfield	Unknown[1]
Forestville	Forestville Water District	Sonoma Water
Graton	Individually Owned Wells	Local wells
Santa Rosa	City of Santa Rosa	Sonoma Water
Glen Ellen, Agua Caliente	Valley of the Moon Water District	Sonoma Water, local wells
Penngrove	Penngrove/Kenwood Water Company	Sonoma Water
Petaluma	City of Petaluma	Sonoma Water
Sonoma	City of Sonoma	Sonoma Water, local wells

[1] Information was not provided by the agency

Source: Appendix WSS;

Appendix WSS identifies the following Rezoning Sites as being directly adjacent[1] to existing water service infrastructure: GEY-1 through GEY-4, GUE-3, GUE-4, LAR-1 through LAR-8, FOR-1 through FOR-3, FOR-5, FOR-6, SAN-2, SAN-4, SAN-6, SAN-7, SAN-9, SAN-10, GLE-1, GLE-2, AGU-1 through AGU-3, PEN-1 through PEN-9, and PET-1 through PET-4. The following sites are not located directly adjacent to existing water pipelines: GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4.

The Sonoma County Water Agency (Sonoma Water) has the rights to store up to 122,500 acre-feet per year (AFY) of water in Lake Mendocino, and to divert 180 cubic feet per second of water from the Russian River (with a limit of 75,000 AFY). Sonoma Water maintains three groundwater wells in the Santa Rosa Plain, and has seven groundwater wells near the Mirabel Park groundwater wells as

[1] "Directly adjacent" is defined as having water and/or sewer service that can be directly accessed without cutting through another parcel or extending pipelines within a public right-of-way.

a backup supply. Sonoma Water has adequate water supply to meet the normal year water demands through 2040 (Appendix WSS).

b. Wastewater Collection and Treatment

Various wastewater districts provide wastewater collection and treatment services in unincorporated Sonoma County. The Rezoning Sites are served by the wastewater districts identified in Table 4.18-2. This table also provides the treatment facility and any capacity deficiencies of the wastewater system. Information provided is partially based on those agencies' adopted capital improvement programs (CIP) that determine what projects will be funded in a 5-year cycle.

Table 4.18-2 Rezoning Sites Sewer Providers and Treatment Facilities

Site Group	Sewer Provider	Treatment Facility
Geyserville	Geyserville Sanitation Zone (Sonoma Water)	92,000 gpd WWTP (Secondary) – no capacity deficiencies; remaining capacity 47,000 gpd
Guerneville	Russian River County Sanitation District (Sonoma Water)	710,000 gpd WWTP (Tertiary) – potential surcharge deficiency
Larkfield	Airport-Larkfield-Wikiup Sanitation Zone (Sonoma Water)	900,000 gpd WWTP (Tertiary) – no capacity deficiencies
Forestville	Forestville Water District	District's Wastewater Treatment Reclamation and Disposal Plant – no capacity deficiencies
Graton	Graton Community Services District	GCSD (Ross Lane) WWTP
Santa Rosa	South Park County Sanitation District/ City of Santa Rosa (Sonoma Water)	MGD Laguna Sub-Regional Treatment Plant (Tertiary) – no capacity deficiencies
Glen Ellen, Agua Caliente, Sonoma	Sonoma Valley County Sanitation District	3.0 MGD Laguna Treatment Plant (Tertiary) – capacity deficiencies to be addressed by CIP projects by 2024
Penngrove	Penngrove Sanitation Zone (Sonoma Water)	Routed to City of Petaluma – capacity deficiencies to be addressed by CIP projects
Petaluma	City of Petaluma	6.7 MGD Ellis Creek Water Recycling Facility (Tertiary)

gpd = gallons per day; WWTP = wastewater treatment plant; MGD = millions of gallons per day; CIP = capital improvement program
Source: Appendix WSS

Appendix WSS identifies the following Rezoning Sites as being directly adjacent to existing wastewater service infrastructure: GEY-2 through GEY-4, GUE-1 through GUE-4, LAR-1 through LAR-6, LAR-8, FOR-3 through FOR-5, GRA-1 through GRA-3, GRA-5, SAN-1 through SAN-9, GLE-1, GLE-2, AGU-1 through AGU-3, PEN-1, PEN-3, PEN-5 through PEN-8, and PET-2 through PET-4. The following sites are not located directly adjacent to existing wastewater collection systems: GEY-1, LAR-7, FOR-1, FOR-2, FOR-6, GRA-4, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4.

c. Stormwater Drainage

As discussed in Section 4.10, *Hydrology and Water Quality*, the Rezoning Sites are in six different watersheds with various topographies. The existing stormwater drainage flow for each Rezoning Site depends on that site's topography and the presence of structures. While most of the Rezoning Sites are not located directly adjacent to a surface water feature, AGU-1 and AGU-2 are adjacent to Sonoma Creek and Agua Caliente Creek; PEN-1, PEN-3, and PEN-8 are adjacent to Lichau Creek;

GUE-4 is near Fife Creek; and GRA-2 is near Atascadero Creek. Most of the Rezoning Sites are not adjacent to curb and gutter storm drains, or stormwater drains following site topography or drainage ditches.

d. Electric Power

Either Sonoma Clean Power (SCP) or Pacific Gas and Electric Company (PG&E) serve unincorporated Sonoma County residences. PG&E is responsible for all electric delivery and maintaining the electric grid, and SCP provides an optional electric generation service (customers can opt out of SCP's electric generation service). SCP provides electricity from cleaner power sources with lower greenhouse gas (GHG) emissions than PG&E. Energy is discussed in more detail in Section 4.6, *Energy*. Existing overhead power lines are in the vicinity of all Rezoning Sites, except SAN-6 and SAN-7, where power lines are undergrounded.

e. Natural Gas

California relies on out-of-state natural gas imports for nearly 90 percent of its natural gas supply. The California Energy Commission (CEC) estimates that 45 percent of the natural gas burned across the state is used for electricity generation, and much of the remainder is consumed in the residential (21 percent), industrial (25 percent), and commercial (9 percent) sectors. Building and appliance energy efficiency standards account for up to 39 percent in natural gas demand savings since 1975 (CEC 2020a).

The County is in PG&E's natural gas service area, which spans central and northern California (CEC 2020b). In 2020, PG&E customers consumed 4.5 billion therms of natural gas. Residential users accounted for approximately 42 percent of PG&E's natural gas consumption (CEC 2022a). The remainder was used for industry (35 percent), commercial buildings (18 percent), mining and construction (3 percent), other commercial (1 percent), and agricultural and water pump accounts (1 percent) (CEC 2022a). In 2020, Sonoma County users accounted for approximately 2.3 percent of PG&E's total natural gas consumption across the entire service area (CEC 2022b).

PG&E's service area is equipped with approximately 6,700 miles of gas transmission pipelines and 42,000 miles of gas distribution pipelines. Large-diameter gas transmission pipeline run along Highway 101 near the Geyserville and Santa Rosa sites; along Donald Street, Oak Grove Avenue, and Bowen Street near the Graton sites; along SR 12 near the Glen Ellen and Agua Caliente sites; along Broadway near the Sonoma sites; and Old Redwood Highway near the Penngrove sites (PG&E 2022).

Large-diameter gas transmission pipeline run along Highway 101 near the Geyserville and Santa Rosa sites; along Donald Street, Oak Grove Avenue, and Bowen Street near the Graton sites; along SR 12 near the Glen Ellen and Agua Caliente sites; along Broadway near the Sonoma sites; and Old Redwood Highway near the Penngrove sites (PG&E 2022). While some sites are not located near large-diameter gas transmission pipelines, smaller-diameter pipelines may serve some Rezoning Sites, or individual natural gas tanks would be required to provide natural gas service to some Rezoning Sites.

f. Telecommunication

In California, approximately 98 percent of households have access to telecommunication infrastructure, including telephone and cable access (California Cable & Telecommunications Association 2020). The County is in the 707 area code and Local Access and Transport Area 1 (California Public Utilities Commission [CPUC] 2010). A Local Access and Transport Area is a

geographical area within which a divested Regional Bell Operating Company is permitted to offer exchange telecommunications and exchange access services (CPUC 2020a).

The Rezoning Sites are in AT&T California's "carrier of last resort" territory. A carrier of last resort is a telecommunications company that commits, or is required by law, to provide service to any customer in a service area that requests it, even if serving that customer would not be economically viable at prevailing rates (CPUC 2018).

g. Solid Waste

Recology Sonoma Marin would provide solid waste hauling services to Agua Caliente, Forestville, Geyserville, Glen Ellen, Graton, Guerneville, Larkfield, Penngrove, Petaluma, and Santa Rosa sites. Sonoma Garbage Collectors would provide solid waste hauling services to the Sonoma sites (Zero Waste Sonoma 2022). Table 4.18-3 provides the active solid waste disposal sites and transfer stations that would accept waste from construction and operation activities on the Rezoning Sites, and the permitted and remaining capacities of each site. Nearly all solid waste generated in the County is transported to and disposed of at the Central Disposal Site, which is southwest of Cotati, and operated by Republic Services of Sonoma County, Inc. The landfill and facility site comprise 398 acres. Approximately 173 acres of the site are permitted for disposal (California Department of Resources Recycling and Recovery [CalRecycle] 2022).

Table 4.18-3 Solid Waste Disposal Operations

Solid Waste Disposal Operation	Operation Type	Type of Waste Accepted	Total Permitted Capacity	Average Throughput	Remaining Capacity	Expected Closure Year
Central Disposal Site	Disposal Site	Agricultural, C/D, industrial, mixed municipal, tires, wood waste, other designated, sludge (BioSolids)	2,500 tpd 32,650,000 cy	1,097 tpd n/a	1,403 tpd 9,181,519 cy	2043
Annapolis Transfer Station	Transfer Station	Agricultural, C/D, green materials, industrial, mixed municipal	99.9 tpd 25,245 tpy	14.7 tpd 3,050 tpy	85.2 tpd 22,195 tpy	n/a
Atlas Tree Surgery Reduction Yard	Private (Compost)	Green materials, wood waste	500 tpd 182,500 tpy	90 tpd n/a	422 tpd n/a	n/a
Grab N' Grow	Private (Compost)	Agricultural, green materials, manure	69 cy/d 90,000 cy/yr	0.1 cy/d n/a	68.9 cy/d n/a	n/a
Airport Landfill Chip & Grind Operation	Private (Compost)	Green materials, wood waste	199 tpd 72,635 tpy	n/a n/a	n/a n/a	n/a
Annapolis Chip & Grind Operation	Private (Compost)	Agricultural, C/D, green materials, wood waste	199 tpd 36,000 tpy	n/a n/a	n/a n/a	n/a
Atlas Tree Processing Yard	Private (Compost)	Green materials, wood waste	200 tpd 72,999 tpy	n/a n/a	n/a n/a	n/a

Solid Waste Disposal Operation	Operation Type	Type of Waste Accepted	Total Permitted Capacity	Average Throughput	Remaining Capacity	Expected Closure Year
Atlas Tree Waste Recycling	Private (Compost)	Green materials, wood waste	200 cy/d 50,000 cy/yr	n/a n/a	n/a n/a	n/a
Daniel O. Davis, Inc.	Private (Compost)	C/D, wood waste	1,500 tpm 18,000 tpy	n/a n/a	n/a n/a	n/a
DenBeste Yard & Garden, Inc.	Private (Compost)	Green materials, wood waste	200 tpd 73,000 tpy	n/a n/a	n/a n/a	n/a
Dolcini Brothers Composting Operation Ag	Private (Compost)	Agricultural, green materials	500 cy/d 50,000 cy/yr	n/a n/a	n/a n/a	n/a
Pruitt Transload Facility	Private (Compost)	Green materials, wood waste	99 tpd 36,135 tpy	n/a n/a	n/a n/a	n/a
SCWS Wood Processing Operation	Private (Compost)	Green materials, wood waste	199 tpd 72,966 tpy	n/a n/a	n/a n/a	n/a
Tierra Vegetables	Private (Compost)	Green materials	10 cy/d 1,000 cy/yr	n/a n/a	n/a n/a	n/a
WMTF	Private (Compost)	Green materials, mixed municipal, other designated	15 tpd 4,961 tpy	n/a n/a	n/a n/a	n/a

Notes: C/D = construction and demolition; tpd = tons per day; tpy = tons per year; n/a = not available; cy/d = cubic yards per day; cy/yr = cubic yards per year; tpm = tons per month; cy = cubic yards

Source: CalRecycle 2022

4.18.2 Water Regulatory Setting

This regulatory setting discussion is specific to the assessment of water supply availability and reliability in addition to the Water and Sewer Study included in Appendix WSS. Regulations and policies pertaining to water quality and potable drinking water standards are discussed in Section 4.10, *Hydrology and Water Quality*.

a. Federal

Clean Water Act

The federal Clean Water Act, enacted by Congress in 1972 and amended several times since, is the primary federal law that regulates water quality in the United States. It forms the basis for several State and local laws throughout the country. The Clean Water Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the U.S. Environmental Protection Agency the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing

requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the U.S. Environmental Protection Agency and USACE. At the state and regional levels in California, the act is administered and enforced by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCB).

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) regulates public water systems (PWS) that supply drinking water. 42 United States Code Section 300(f) et seq.; 40 Code of Federal Regulations (CFR) Section 141 et seq. The principal objective of the federal SDWA is to ensure that water from the tap is potable (safe and satisfactory for drinking, cooking, and hygiene). The main components of the federal SDWA are to:

1. Ensure that water from the tap is potable
2. Prevent contamination of groundwater aquifers that are the main source of drinking water for a community
3. Regulate the discharge of wastes into underground injection wells pursuant to the Underground Injection Control program (see 40 CFR Section 144)
4. Regulate distribution systems

b. State

California Safe Drinking Water Act

The California SDWA (Health and Safety Code Section 116270 et seq.; 22 Cal. Code Regs. Section 64400 et seq.) regulates drinking water more rigorously than the federal law. Like the Federal SDWA, California requires that primary and secondary maximum contaminant levels be established for pollutants in drinking water; however, some California maximum contaminant levels are more protective of health. The Act also requires the SWRCB to issue domestic water supply permits to public water systems.

Implementation of the federal SDWA is delegated to the State of California. The SWRCB enforces the federal and state SDWAs and regulates more than 7,500 PWSs across the state. The SWRCB's Division of Drinking Water oversees the State's comprehensive Drinking Water Program. The Drinking Water Program is the agency authorized to issue PWS permits.

Sustainable Groundwater Management Act

In September 2014, the governor signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins, as defined by the DWR. Please refer to Section 4.10, *Hydrology and Water Quality*, for more detailed descriptions of the groundwater basins underlying the Rezoning Sites.

California Plumbing Code

The California Plumbing Code is codified in Title 24, California Code of Regulations, Part 5. The Plumbing Code contains regulations including, but not limited to, plumbing materials, fixtures, water heaters, water supply and distribution, ventilation, and drainage. More specifically, Part 5, Chapter 4, contains provisions requiring the installation of low flow fixtures and toilets. Existing development

will also be required to reduce its wastewater generation by retrofitting existing structures with water efficient fixtures (Civil Code Section 1101.1 et seq.).

Urban Water Management Planning Act

In 1983, the California Legislature enacted the Urban Water Management Planning Act (Water Code, Section 10610 et seq.), which requires urban water suppliers to develop water management plans to actively pursue the efficient use of available supplies. Every five years, water suppliers are required to develop Urban Water Management Plans to identify short-term and long-term water demand management measures to meet growing water demands.

c. Local

Sonoma County General Plan

The County General Plan was adopted by the Sonoma County Board of Supervisors Resolution 08-0808 on September 23, 2008. The County General Plan includes broad goals and policies aimed at protecting the County's water supply and water quality and ensuring adequate water service is available.

Goal PF-1: Assure that water and wastewater services are available where necessary to serve planned growth and development without promoting unplanned growth.

Objective PF-1.3: Limit extension of public water and sewer services into rural areas.

Policy PF-1c: Give the highest priority for water and sewer improvement planning to those service providers whose capacity for accommodating future growth is most limited. These include the Occidental County Sanitation District, the Geyserville Water Works and Geyserville Sanitation Zone, the Sweetwater Springs Water District, Monte Rio, the Town of Windsor (water supply to the Airport Industrial Area), the California American Water Company (Larkfield-Wikiup), the Airport-Larkfield-Wikiup County Sanitation Zone, the Valley of the Moon Water District, and the Sonoma Valley Sanitation District, or any entities which may succeed these service providers.

Policy PF-1d: Require as part of discretionary project applications within a water or sewer service area written certification that either existing services are available or needed improvements will be made prior to occupancy.

Policy PF-1e: Avoid General Plan amendments that would increase demand for water supplies or wastewater treatment services in those urban areas where existing services cannot accommodate projected growth as indicated in Table LU-1 or any adopted master plan.

4.18.3 Wastewater Regulatory Setting

a. Federal Clean Water Act

The federal Clean Water Act is described in Section 4.18.2, *Water Regulatory Setting*.

b. State and Regional

Standards for wastewater treatment plant effluent are established using State and federal water quality regulations. After treatment, wastewater effluent is either disposed of or reused as recycled

water. The RWQCBs set the specific requirements for community and individual wastewater treatment and disposal and reuse facilities through the issuance of Waste Discharge Requirements, required for wastewater treatment facilities under the California Water Code Section 13260.

The California Code of Regulations Title 22, Division 4, Chapter 3, Sections 60301 through 60355 are used to regulate recycled wastewater and are administered by the RWQCBs. Title 22 contains effluent requirements for four levels of wastewater treatment, from un-disinfected secondary recycled water to disinfected tertiary recycled water. Higher levels of treatment have higher effluent standards, allowing for a greater number of uses under Title 22, including irrigation of freeway landscaping, pasture for milk animals, parks and playgrounds, and vineyards and orchards for disinfected tertiary recycled water.

c. Local

Sonoma County General Plan

The County General Plan was adopted by the Sonoma County Board of Supervisors via Resolution 08-0808 on September 23, 2008. The County General Plan includes broad goals and policies aimed at protecting the County's water quality and ensuring adequate sewer service is available. In addition to the goals, objectives, and policies reproduced in Section 4.18.2(c), the following policies would apply to wastewater systems:

Objective PF-1.4: Plan for wastewater facilities adequate to serve the growth projected in the General Plan.

Policy PF-1a: Plan, design, and construct sewer services in accordance with projected growth except as provided in Policy LU-4d.

4.18.4 Stormwater Drainage Regulatory Setting

Regulations and policies pertaining to stormwater drainage are discussed in Section 4.10, *Hydrology and Water Quality*.

4.18.5 Electric Power and Natural Gas Regulatory Setting

As the State's primary energy policy and planning agency, the CEC collaborates with State and federal agencies, utilities, and other stakeholders to develop and implement State energy policies. Since 1975, the CEC has been responsible for reducing the State's electricity and natural gas demand, primarily by adopting new Building and Appliance Energy Efficiency Standards that have contributed to keeping California's per capita electricity consumption relatively low. The CEC is also responsible for the certification and compliance of thermal power plants 50 megawatts and larger, including all project-related facilities in California (CEC 2020c).

The California Public Utilities Commission (CPUC) regulates investor-owned electric and natural gas utilities operating in California. The energy work responsibilities of the CPUC are derived from the California State Constitution, specifically Article XII, Section 3 and other sections more generally, numerous State legislative enactments and various Federal statutory and administrative requirements. The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from PG&E and other natural gas utilities across California (CPUC 2021).

Additional regulations and policies pertaining to electric power are discussed in Section 4.6, *Energy*.

4.18.6 Telecommunication Regulatory Setting

The CPUC develops and implements policies for the telecommunication industry. The Communications Division is responsible for licensing, registration and the processing tariffs of local exchange carriers, competitive local carriers, and non-dominant interexchange carriers. It is also responsible for registration of wireless service providers and franchising of video service providers. The Division tracks compliance with commission decisions and monitors consumer protection and service issues and Commission reliability standards for safe and adequate service. The Communications Division is responsible for oversight and implementation of the six public purpose Universal Service Programs (CPUC 2020b).

4.18.7 Solid Waste Regulatory Setting

a. Federal

Title 40 of the Code of Federal Regulations, Part 258

Title 40 of the CFR, Part 258 (Resource Conservation and Recovery Act, Subtitle D), contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the Federal landfill criteria.

b. State

Assembly Bill 341 (2011) and Senate Bill 1383 (2016)

The purpose of Assembly Bill (AB) 341 of 2011 (Statutes of 2011, Chapter 476) is to reduce GHG emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. In addition to mandatory commercial recycling, AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

SB 1383 of 2016 (Statutes of 2016, Chapter 395) established the following goals: a 50-percent reduction in the level of the statewide disposal of organic waste from 2014 levels by 2020, and a 75-percent reduction in the level of the statewide disposal of organic waste from 2014 levels by 2025. This bill also authorized CalRecycle to adopt regulations, to take effect on or after January 1, 2022, to achieve these targets.

California Integrated Waste Management Act (Assembly Bill 939, 1989)

AB 939 of 1989 (PRC Section 40000 et seq.) requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare source reduction and recycling elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing, and stimulate the purchase of recycled products.

PRC Sections 42649.8-42649.87 (Assembly Bill 1826)

AB 1826 of 2014 (PRC Chapter 727, Statutes of 2014) requires businesses that generate a specified amount of organic waste per week to arrange for recycling services for that waste, and that jurisdictions implement a recycling program to divert organic waste from businesses subject to the

law. The jurisdictions must report to CalRecycle on their progress in implementing an organic waste recycling program. As of January 1, 2017, businesses that generate four cubic yards or more of organic waste per week shall arrange for organic waste recycling services.

Senate Bill 1016 (2007)

SB 1016 of 2007 (Statutes of 2007, Chapter 343) requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. After an initial determination of diversion requirements in 2006 and establishing diversion rates for subsequent calendar years, the Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. Since January 1, 2018, the Board is required to review a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

c. Local

County General Plan

The Public Facilities and Services Element of the County General Plan identifies goals and policies related to solid waste, reproduced below.

Goal PF-2: Assure that park and recreation, public education, fire suppression and emergency medical, and solid waste services, and public utility sites are available to the meet future needs of Sonoma County residents.

Objective PF-2.9: Use the CoIWMP, and any subsequent amendments thereto, as the policy document for solid waste management in the County.

Policy PF-2a: Plan, design, and construct park and recreation, fire and emergency medical, public education, and solid waste services and public utilities in accordance with projected growth, except as provided in Policy LU-4d.

Policy PF-2b: Work with the Cities to provide park and recreation, public education, fire and emergency medical, and solid waste services as well as public utilities. Use proposed annexations, redevelopment agreements, revenue sharing agreements, and the CEQA process as tools to ensure that incorporated development pay its fair share toward provision of these services.

Policy PF-2q: Review projects on or near designated solid waste facilities sites for compatibility with such facilities.

Countywide Integrated Waste Management Plan

The Countywide Integrated Waste Management Plan (CoIWMP), dated October 15, 2003, provides a solid waste disposal strategy through the year 2050. The plan includes the following goals, objectives, and policies to ensure adequate waste prevention, reuse, recycling, composting, and disposal services.

Goal A: In order to help ensure the sustainability of our communities and to conserve natural resources and landfill capacity, the Sonoma County Waste Management Agency (SCWMA), County and the Cities will continue to improve their municipal solid waste management system through emphasis on the solid waste management hierarchy of waste prevention (source reduction), reuse, recycling, composting and disposal.

Goal B: The County and the Cities will exercise regional cooperation in the achievement of solid waste planning objectives through the SCWMA.

Goal C: The solid waste management system in Sonoma County will be planned and operated in a manner to protect public health, safety, and the environment.

Objective: The County and the Cities will achieve a 50 percent diversion (see Figure 1-1) of wastes being disposed of in county landfills by the year 2003 and a 70 percent diversion rate (see Figure 1-2) by 2015 based on 1990 rates.

Objective: The SCWMA will achieve measurable reduction of landfill disposal of prohibited wastes documented by waste characterization studies at the end of the short term and medium-term planning periods.

Objective: The County will develop disposal capacity for solid waste not handled by other elements of the management hierarchy for a 50-year horizon. Disposal capacity is addressed in the Siting Element of the CoIWMP.

2.4.1 Source Reduction Implementation Policy: The SCWMA, County and the Cities will encourage and support the use of waste minimization practices for business, government agencies, and the public by distributing information on the availability of waste minimization options.

2.4.1 Source Reduction Implementation Policy: The SCWMA, the County, and the Cities will continue to encourage and support backyard compo sting for businesses, residences, and government agencies by providing information and technical assistance.

2.4.2 Recycling Implementation Policy: The County and the Cities will provide access to residential recycling programs for all households, including single-family, multi-family, and mobile homes, that subscribe to garbage services by the end of the short-term planning period.

2.4.3 Composting Implementation Policy: The SCWMA, County and the Cities will provide access to composting opportunities through implementation of composting facilities and programs which may be regional or local, public or private.

2.4.4 Special Waste Implementation Policy: The SCWMA, County and the Cities will promote recycling of construction and demolition debris through education, regulation and economic incentives.

2.4.4 Special Waste Implementation Policy: The County will provide alternative disposal options for recyclable items or materials such as, but not limited to, yard debris, recyclable wood waste, whole tires, and appliances and ban the landfill disposal of these items.

2.4.6 Solid Waste Management Implementation Policy: Satisfy the AB 939 solid waste planning and diversion mandates in a manner that is consistent with the objectives of the community, as reflected by the deliberations and documents of the AB 939 Local Task Force and Sonoma County Waste Management Agency.

4.18.8 Impact Analysis

a. Significance Thresholds and Methodology

The proposed project would have a significant effect on water supplies, wastewater, solid waste, or storm water conveyance if demand associated with projected growth would result in any of the following conditions, as listed in *CEQA Guidelines* Appendix G:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects
2. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years
3. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects' projected demand in addition to the provider's existing commitments
4. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste

b. Project Impacts and Mitigation Measures

Threshold:	Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
Threshold:	Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
Threshold:	Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact UTIL-1 IMPACTS RELATED TO STORMWATER DRAINAGE, ELECTRIC POWER, NATURAL GAS, AND TELECOMMUNICATION INFRASTRUCTURE WOULD BE LESS THAN SIGNIFICANT. IMPACTS RELATED TO WATER AND WASTEWATER FACILITIES WOULD BE SIGNIFICANT DUE TO REZONING SITES THAT ARE NOT LOCATED ADJACENT TO EXISTING WASTEWATER COLLECTION INFRASTRUCTURE; IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH IMPLEMENTATION OF MITIGATION MEASURES. HOWEVER, WATER SUPPLY IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE, EVEN WITH IMPLEMENTATION OF MITIGATION MEASURES.

Water

Development facilitated by the project would create additional demand for water supply in the Unincorporated County. Because development facilitated by the project would occur within designated Urban Service Areas, existing water infrastructure exists at most of the Rezoning Sites. However, as described in Appendix WSS, the following sites are not located directly adjacent to existing water pipelines: GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4. These sites would require the construction of expanded water supply facilities, including upgraded pipeline and potentially new pumps, to develop at the densities contemplated by this project. This impact would be significant and Mitigation Measure UTIL-1 would be required.

Generally, the ground disturbance required to construct these upgrades would occur in previously disturbed or developed areas, such as public rights-of-way, thereby reducing the potential for

environmental impacts. Compliance with mitigation measures in this Program EIR, including Mitigation Measures BIO-1 through BIO-17, CUL-1 through CUL-9, and TCR-1 through TCR-5, would minimize impacts to sensitive environmental resources where upgrades require off-site construction for the expansion of water supply services. Therefore, the proposed project would not result in construction or relocation of water facilities such that significant environmental impacts would occur.

The water demand calculations for the Rezoning Sites were based on water demand factors set by the County's regional compliance target and calculated using the increase in population (Appendix WSS). The increase in total projected water demand that would be generated by development facilitated by the project is 869.69 AFY for sites adjacent to existing water supply facilities, 260.23 AFY for sites requiring the extension of water facilities, and 1,129.92 AFY total for all Rezoning Sites. Table 4.18-4 provides the increase in water demand per water service provider for the Rezoning Sites adjacent to existing water infrastructure.

Table 4.18-4 Increase in Water Demand by Water Service Provider

Site Group	Water Provider	Water Demand Increase (AFY) for Potential Sites Near Existing Water Infrastructure
Geyserville	Cal-Am – Geyserville	40.5
Guerneville	California Water – Armstrong Valley	93.2
Larkfield	Cal-Am – Larkfield	79.9
Forestville	Forestville Water District	224.5
Santa Rosa	City of Santa Rosa	373.6
Glen Ellen, Agua Caliente	Valley of the Moon Water District	79.2
Penngrove	Penngrove/Kenwood Water Company	64.8
Petaluma	City of Petaluma	68.1

AFY = acre-feet per year
Source: Appendix WSS

Each water service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide water service to the Rezoning Sites. In addition, California American Water – Larkfield prepared a Water Supply Assessment (Appendix WSA) detailing its ability to provide water service to the Rezoning Sites within its service area. With the implementation of proposed capital improvement projects, development facilitated by the project on the Agua Caliente, Glen Ellen, Larkfield, Sonoma, Santa Rosa, Forestville, Graton, Guerneville, Penngrove, and Petaluma Sites would have access to adequate water service. Information was not provided by California American Water – Geyserville. Furthermore, the Rezoning Sites that are not currently directly adjacent to water supply infrastructure (GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4) were not fully evaluated in Appendix WSS for adequate water supply capacity. As such, impacts of development on these sites would be significant and Mitigation Measure UTIL-1 would be required.

Wastewater

Development facilitated by the proposed project would create additional demand for wastewater treatment in the Unincorporated County. Because development facilitated by the project would occur within designated Urban Service Areas, existing wastewater infrastructure exists at most of the Rezoning Sites. However, as described in Appendix WSS, the following sites are not located

adjacent to existing wastewater collection systems: GEY-1, LAR-7, FOR-1, FOR-2, FOR-6, GRA-4, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4. Additionally, the wastewater capacity for sites GUE-1 through GUE-4, GRA-1 through GRA-5, and PET-1 through PET-4 is either unknown or limited. These sites would require the construction of expanded wastewater facilities, including upgraded pipeline and potentially new pumps. Generally, the ground disturbance required to construct these upgrades would occur in previously disturbed or developed areas, such as public rights-of-way, reducing the potential for environmental impacts. Compliance with mitigation measures in this Program EIR, including Mitigation Measures BIO-1 through BIO-17, CUL-1 through CUL-9, and TCR-1 through TCR-5, would minimize impacts to sensitive environmental resources where upgrades require off-site construction for the expansion of wastewater services. Therefore, the proposed project would not result in construction or relocation of wastewater facilities such that significant environmental impacts would result.

The wastewater generation calculations for the Rezoning Sites were based on sewage generation factors from the County's development guidelines and calculated using the increase in population (Appendix WSS). The increase in projected peak hour wastewater that would be generated by development facilitated by the project is 456,741 gallons per day (gpd) for sites adjacent to existing wastewater conveyance facilities, 172,467 gpd for sites requiring the extension of wastewater facilities, and 629,208 gpd total for all Rezoning Sites.[2] Table 4.18-5 provides the increase in peak hour wastewater generation per sewer service provider for the Rezoning Sites adjacent to existing wastewater infrastructure.

Table 4.18-5 Increase in Wastewater Generation by Sewer Service Provider

Site Group	Wastewater Provider	Peak Hour Wastewater Generation Increase (gpd) for Rezoning Sites Near Existing Wastewater Infrastructure
Geyserville	Geyserville Sanitation Zone	14,000
Guerneville	Russian River County Sanitation District	32,139
Larkfield	Airport-Larkfield-Wikiup Sanitation Zone	48,944
Forestville	Forestville Water District	29,735
Graton	Graton Community Services District	26,701
Santa Rosa	South Park County Sanitation District/City of Santa Rosa	207,101
Glen Ellen, Agua Caliente	Sonoma Valley County Sanitation District	43,846
Penngrove	Penngrove Sanitation Zone	29,016
Petaluma	City of Petaluma	25,260

gpd = gallons per day
Source: Appendix WSS

Each wastewater service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide wastewater service to the Rezoning Sites. With the implementation of proposed capital improvement projects, development facilitated by the project would have access to adequate wastewater service. However, the Rezoning Sites that are not currently directly adjacent to wastewater collection infrastructure (pipelines) were not fully evaluated in Appendix WSS for adequate sewer capacity (GEY-1, LAR-7, FOR-1, FOR-2, FOR-6, GRA-4,

[2] Numbers may differ due to rounding.

SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4). As such, impacts of development on these sites would be significant and Mitigation Measure UTIL-1 would be required.

Stormwater

Impacts regarding stormwater drainage facilities are discussed in Section 4.10, *Hydrology and Water Quality*.

Electric Power

The project would require connections to existing electrical transmission and distribution systems on site to serve the Rezoning Sites. This service would be provided in accordance with the rules and regulations of PG&E on file with and approved by CPUC. Based on the availability of existing electrical infrastructure, it is not anticipated that the construction of new electrical transmission and distribution lines would be required, and all sites would be able to connect to existing infrastructure. Therefore, there would be adequate electrical facilities to serve future development on the Rezoning Sites and impacts related to electricity would be less than significant.

Natural Gas

Future projects on the Rezoning Sites would connect to existing natural gas infrastructure to meet the needs of site residents and tenants. Based on the availability of existing natural gas infrastructure, construction of new natural gas pipelines would not be required, and all sites would be able to connect to existing infrastructure. Therefore, there would be adequate natural gas facilities to serve the future development on the Rezoning Sites and impacts related to natural gas would be less than significant.

Telecommunications

Project implementation requires connections to existing adjacent utility infrastructure to meet the needs of site residents and tenants. Based on the availability of existing telecommunications infrastructure, construction of new telephone and cable lines would not be required, and all sites would be able to connect to existing infrastructure. The project would be required to adhere to applicable laws and regulations related to the connection to existing telecommunication infrastructure. Therefore, there would be adequate telecommunications facilities to serve the future development on the Rezoning Sites and impacts related to telecommunications would be less than significant.

Summary

As discussed above, there is adequate electric power, natural gas, and telecommunication infrastructure to serve the project (impacts regarding stormwater drainage facilities are discussed in Section 4.10, *Hydrology and Water Quality*). Impacts related to the provision of these utility facilities would be less than significant. However, several of the Rezoning Sites are not adjacent to existing water or wastewater infrastructure and require further evaluation at the project level during the plan review and permit approval phase. Mitigation Measure UTIL-1 is required to reduce impacts related to water supply and wastewater system sufficiency.

Mitigation Measure

The County shall require the following mitigation measure for applicable projects.

UTIL-1 WATER AND WASTEWATER PROVIDER CAPACITY

Future development proposed on the following sites shall be required to demonstrate that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary improvements to serve a Rezoning Site will be made prior to occupancy:

1. Rezoning Sites that need to demonstrate capacity from the applicable water service provider: GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4.
2. Rezoning Sites that need to demonstrate capacity from the applicable wastewater service provider: GEY-1, GUE-2, GUE-3, LAR-1 through LAR-8, FOR-1, FOR-2, FOR-6, GRA-4, SAN-6, SAN-7, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4.

The required documentation shall be provided to the County during the plan review and permit approval process for projects on the above-listed Rezoning Sites.

Significance After Mitigation

With implementation of Mitigation Measure UTIL-1, development on Rezoning Sites GUE-1, GUE-2, FOR-1, FOR-2, FOR-4, FOR-6, GRA-1 through GRA-5, LAR-1 through LAR-8, PEN-2, PEN-4, PEN-9, PET-1, SAN-1, SAN-3, SAN-5 through SAN-8, SAN-10, and SON-1 through SON-4 would be adequately served by water and wastewater service providers. However, there is not substantial evidence to determine that development on Rezoning Sites GEY-1 through GEY-4 would be adequately served by California American Water – Geyserville. Therefore, impacts would be significant and unavoidable.

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

Impact UTIL-2 THE PROJECT WOULD NOT GENERATE SOLID WASTE IN EXCESS OF STATE OR LOCAL STANDARDS, OR IN EXCESS OF THE CAPACITY OF LOCAL INFRASTRUCTURE, INCLUDING THE CENTRAL DISPOSAL SITE. THE PROJECT WOULD NOT IMPAIR THE ATTAINMENT OF SOLID WASTE REDUCTION GOALS AND WOULD COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Project implementation would result in the addition of up to 2,975 residential units associated with Rezoning Sites throughout the Unincorporated County. Based on a solid waste generation rate of 12 pounds per household per day (CalRecycle 2019), the project would generate an estimated 17.9 tons, or 44.0 cubic yards,[3] of solid waste per day associated with future projects. According to CalRecycle, the remaining capacity of the Central Disposal Site is approximately 9 million cubic yards. The Central Disposal Site is projected to reach its maximum capacity in year 2043 (CalRecycle 2022). This equates to an average annual disposal capacity of approximately 399,196 cubic yards per year. The project would yield an annual solid waste generation rate of approximately 16,058 cubic yards per year. This accounts for approximately 1.3 percent of the average daily throughput capacity

[3] Household trash is approximately 800 pounds per cubic yard (CalRecycle 20219).

and less than 0.1 percent of the annual disposal capacity of the Central Disposal Site. Therefore, the project would not generate solid waste in excess of the capacity of local solid waste infrastructure.

Policies in the County General Plan and CoIWMP address solid waste generation and disposal at residential properties. Future projects on the Rezoning Sites would be required to comply with these policies, including paying a fair share for solid waste services and achieving greater diversion rates than required by AB 939. Additionally, the County, per the CoIWMP, is required to provide access to residential recycling programs, composting opportunities, and other waste reduction programs for all residential uses in the County. Therefore, the project would not impede the implementation of county solid waste reduction goals.

AB 939 requires the County to divert 50 percent of solid waste from landfills. In 2011, approximately 74 percent of the waste stream was diverted from landfilling and recycled (County of Sonoma 2022). Local infrastructure would have the capacity to accommodate solid waste generated by the project. The project would be required to demonstrate compliance with all applicable regulations. The project's solid waste disposal would have a less than significant impact for local solid waste infrastructure.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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4.19 Wildfire

The analysis in this section addresses the potential for the proposed project to exacerbate wildfire risks.

4.19.1 Setting

a. Overview of Wildfire

A wildfire is an uncontrolled fire in an extensive area of combustible vegetation. Wildfires differ from other fires in that they take place in areas of grassland, woodlands, brushland, scrubland, peatland, and other wooded areas that act as a source of fuel, or combustible material. Buildings may become involved if a wildfire spreads to adjacent communities. The primary factors that increase an area's susceptibility to wildfire include slope and topography, vegetation type and condition, and weather and atmospheric conditions. Extreme wildfire events are expected to increase in frequency by 20 percent by 2050 and by 50 percent by the end of the century (County of Sonoma 2017). The Office of Planning and Research has recognized that although high-density structure-to-structure loss can occur, structures in areas with low- to intermediate-density housing were most likely to burn, potentially due to intermingling with wildland vegetation or difficulty of firefighter access. Fire frequency also tends to be highest at low to intermediate housing density, at least in regions where humans are the primary cause of ignitions (California Natural Resources Agency 2018).

The indirect effects of wildfires can be catastrophic. In addition to stripping the land of vegetation and destroying forest resources, large, intense fires can harm the soil, waterways, and the land itself. Soil exposed to intense heat may lose its capability to absorb moisture and support life. Exposed soils erode quickly and enhance siltation of rivers and streams, thereby enhancing flood potential, harming aquatic life, and degrading water quality. Lands stripped of vegetation are also subject to increased debris flow hazards.

Between 1964 and 2020, Sonoma County experienced 23 large or costly wildfires (County of Sonoma 2021). Most recently, the 2017 Sonoma Complex Fires caused 24 deaths, burned over 112,000 acres, and destroyed about 5,300 homes; the 2019 Kincade Fire burned 77,758 acres, destroyed 374 structures, including 174 residences, and damaged 60 additional structures, including 34 residences (California Department of Forestry and Fire Protection [CAL FIRE] 2019a; County of Sonoma 2021); the Glass Fire of 2020 burned over 67,000 acres, destroyed 1,555 structures, and damaged an additional 282 structures across both Napa and Sonoma counties; and the LNU Lightning Complex fires of 2020 burned over 355,000 acres, destroyed 159 residences, and damaged an additional 10 residences in Sonoma County (CAL FIRE 2020a; County of Sonoma 2021). The mountainous, highly combustible areas in eastern Sonoma County have a Fire Hazard Severity Zone (FHSZ) ranking of "very high" (CAL FIRE 2007a) and, therefore, are most susceptible to wildfires. Communities near this area include Cloverdale, Geyserville, eastern Santa Rosa, and Sonoma.

Slope and Aspect

According to CAL FIRE, sloping land increases susceptibility to wildfire because fire typically burns faster up steep slopes and they may hinder firefighting efforts (CAL FIRE 2007b). Following severe wildfires, sloping land is also more susceptible to landslide or flooding from increased runoff during substantial precipitation events. Aspect is the direction that a slope faces, and it determines how

much radiated heat the slope will receive from the sun. Slopes facing south to southwest will receive the most solar radiation; thus they are warmer and the vegetation drier than on slopes facing a northerly to northeasterly direction, increasing the potential for wildfire ignition and spread (University of California 2018).

The 59 Rezoning Sites to are located throughout the County, and each of the location clusters is near urban development that tends to occur in relatively flat portions of the County, although sites may be adjacent to steep slopes. For example, near Geyserville the sites are relatively flat, but mountains are located to the west, immediately across Highway 101. Similarly, sites near Guerneville and Glen Ellen are situated in small valleys surrounded by mountainous terrain. Sites near Larkfield and Santa Rosa have generally flat terrain, with mountains located outside the urban areas to the east. Sites near Forestville and Graton tend to be slightly sloped, with mountainous terrain nearby to the west. Sites near Agua Caliente and Sonoma are in a larger and mostly flat valley, with mountainous terrain to the east and west. Finally, sites near Penngrove and Petaluma are slightly sloped, with less steep mountainous terrain to the east and west, and south and west, respectively. Please refer to Table 4.19-1 for the approximate slope percent on each Rezoning Site and in the general vicinity of each site. Steeper slopes (greater than 15 percent) are more likely to experience fast wildfire spread, while flatter slopes (5 percent or less) are not as likely to experience fast wildfire spread.

Table 4.19-1 Rezoning Sites Slope Information

Rezoning Site	Slopes on Site	Slopes Near Site
GEY-1	0-5%	0-50%
GEY-2	0-5%	0-50%
GEY-3	0-5%	0-50%
GEY-4	0-5%	0-50%
GUE-1	30-50%	0-50%
GUE-2	0-5%	0-50%
GUE-3	0-5%, 50-75%	0-50%
GUE-4	0-2%	0-50%
LAR-1	0-9%	0-15%
LAR-2	0-9%	0-15%
LAR-3	0-9%	0-15%
LAR-4	0-5%	0-15%
LAR-5	0-9%	0-15%
LAR-6	0-9%	0-15%
LAR-7	0-5%	0-15%
LAR-8	0-5%	0-15%
FOR-1	2-9%, 9-15%	0-75%
FOR-2	2-9%	0-75%
FOR-3	2-9%	0-75%
FOR-4	9-15%	0-75%
FOR-5	2-9%	0-75%
FOR-6	2-9%	0-75%

Rezoning Site	Slopes on Site	Slopes Near Site
GRA-1	2-9%	0-30%
GRA-2	2-5%	0-30%
GRA-3	9-30%	0-30%
GRA-4	2-9%	0-30%
GRA-5	2-15%	0-30%
SAN-1	0-2%	0-9%
SAN-2	0-2%	0-9%
SAN-3	0-2%	0-9%
SAN-4	0-2%	0-9%
SAN-5	0-2%	0-9%
SAN-6	0-2%	0-9%
SAN-7	0-2%	0-9%
SAN-8	0-2%	0-9%
SAN-9	0-2%	0-9%
SAN-10	0-2%	0-9%
GLE-1	2-9%	2-50%
GLE-2	2-9%	2-50%
AGU-1	0-2%	0-15%
AGU-2	0-2%	0-15%
AGU-3	0-2%	0-15%
PEN-1	9-15%	0-30%
PEN-2	2-15%	0-30%
PEN-3	9-15%	0-30%
PEN-4	2-15%	0-30%
PEN-5	9-15%	0-30%
PEN-6	9-15%	0-30%
PEN-7	2-9%	0-30%
PEN-8	9-15%	0-30%
PEN-9	0-2%, 9-15%	0-30%
PET-1	2-9%	2-15%
PET-2	2-15%	2-15%
PET-3	2-15%	2-15%
PET-4	2-15%	2-15%
SON-1	0-9%	0-9%
SON-2	0-9%	0-9%
SON-3	0-9%	0-9%
SON-4	0-9%	0-9%

Source: National Resources Conservation Service 2020

Vegetation

Vegetation is fuel to a wildfire and it changes over time with seasonal growth and die-back. The relationship between vegetation and wildfire is complex, but generally some vegetation is naturally fire resistant, while other vegetation is extremely flammable. It is worth noting that some plant types in California landscapes are fire resistant, while others are actually fire dependent for their seed germination cycles. Wildfire behavior depends on the type of fuels present, such as ladder fuels, surface fuels, and aerial fuels. Ladder fuels provide a path for a surface fire to climb upward into the crowns of trees; surface fuels include grasses, logs, and stumps low to the ground; and aerial fuels include limbs, foliage, and branches not in contact with the ground (CAL FIRE 2020). Weather and climate conditions, including drought cycles, can lead to dry vegetation with low moisture content, increasing its flammability.

The Rezoning Sites are in urbanized areas and vary in the existing vegetation present on each site. For example, GEY-1 consists of undeveloped grassland, while GEY-2 through GEY-4 are developed with structures and contain both grassy areas and mature trees. Sites near Guerneville tend to have more vegetation in the form of trees and landscaping, while sites near Larkfield tend to be undeveloped grassland with few trees. Sites near Forestville are less vegetated than those near Guerneville but more vegetated than those near Larkfield. Sites near Graton vary substantially between areas of dense tree vegetation, disturbed sites used for storage, and grassy fields. Sites near Santa Rosa are typically developed, with primarily landscaped vegetation, or disturbed with little vegetation present or disked grassland. Sites near Glen Ellen and Agua Caliente contain some existing structures and trees. Sites near Penngrove are either minimally developed grassland areas with few trees, commercially-developed sites, or moderately developed sites with existing structures and perimeter trees. Site near Petaluma are partially developed, with large portions of the sites undeveloped grassland with few trees. Finally, sites near Sonoma contain existing structures, grassy areas, and scattered trees.

Weather and Atmospheric Conditions

Wind, temperature, and relative humidity are the most influential weather elements in fire behavior and susceptibility (National Park Service 2017). Fire moves faster under hot, dry, and windy conditions. Wind may also blow embers ahead of a fire, causing its spread. Drought conditions lead to extended periods of excessively dry vegetation, increasing the fuel load and ignition potential.

The Western Regional Climate Center maintains numerous weather monitoring stations throughout the County. According to data collected at weather stations located near Rezoning Sites, most precipitation is received from November through March, with an average annual rainfall ranging between 25 and 47 inches (Western Regional Climate Center 2016). May through September is the driest time of the year and coincides with what has traditionally been considered the fire season in California. However, increasingly persistent drought and climatic changes in California have resulted in drier winters, and fires during the autumn, winter, and spring months are becoming more common. Prevailing winds in Sonoma are generally from the northwest to the southeast (National Oceanic and Atmospheric Administration 2022).

b. Wildfire Hazards

In California, responsibility for wildfire prevention and suppression is shared by federal, state, and local agencies. Federal agencies are responsible for federal lands in Federal Responsibility Areas. The State of California has determined that some non-federal lands in unincorporated areas with watershed value are of statewide interest and have classified those lands as State Responsibility

Areas (SRA), which are managed by CAL FIRE (US Department of the Interior, US Department of Agriculture, and CAL FIRE 2018). All incorporated areas and other unincorporated lands are classified as Local Responsibility Areas (LRA).

CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors (Public Resources Code Sections 4201-4204 and California Government Code Sections 51175-89). As described above, the primary factors that increase an area's susceptibility to fire hazards include slope, vegetation type and condition, and atmospheric conditions. CAL FIRE maps fire hazards based on zones, referred to as FHSZs. CAL FIRE maps three zones in the SRA: 1) Moderate FHSZs; 2) High FHSZs; and 3) Very High FHSZs. Only the Very High FHSZs are mapped in LRA. Each of the zones influence how people construct buildings and protect property to reduce risk associated with wildfires. Under state regulations, areas within Very High FHSZs must comply with specific building and vegetation management requirements intended to reduce property damage and loss of life within these areas. Table 4.19-2 provides the FHSZ designation and distance to the nearest Very High FHSZ for each Rezoning Site and Table 4.19-3 provides the distance to the nearest SRA for each Rezoning Site. Figure 4.19-1 through Figure 4.19-12 map the Rezoning Sites in relation to FHSZs and SRAs.

Table 4.19-2 FHSZ Designation of Rezoning Sites

Rezoning Sites	FHSZ Designation	Distance to Nearest Very High FHSZ
GEY-1 through GEY-4	None	<1.2 miles
GUE-1 through GUE-4	Moderate	>2 miles
LAR-1 through LAR-8	None	>2 miles
FOR-1, FOR-4	None	<1.3 mile to Very High FHSZ
FOR-2	None	<1 mile to Very High FHSZ
FOR-3, FOR-5, FOR-6	None	<1.5 mile to Very High FHSZ
GRA-1 through GRA-5	None	>2 miles
SAN-1 through SAN-10	None	>2 miles
GLE-1, GLE-2	Moderate	<1.2 mile
AGU-1 through AGU-3	None	<2 miles
PEN-1, PEN-3, PEN-5, PEN-6, PEN-8, PEN-9	None	>2 miles
PEN-2, PEN-4, PEN-7	Moderate	>2 miles
PET-1 through PET-4	None	>2 miles
SON-1 through SON-4	None	>2 miles

Source: National Resources Conservation Service 2020

Figure 4.19-1 Fire Hazard Severity Zones – Countywide

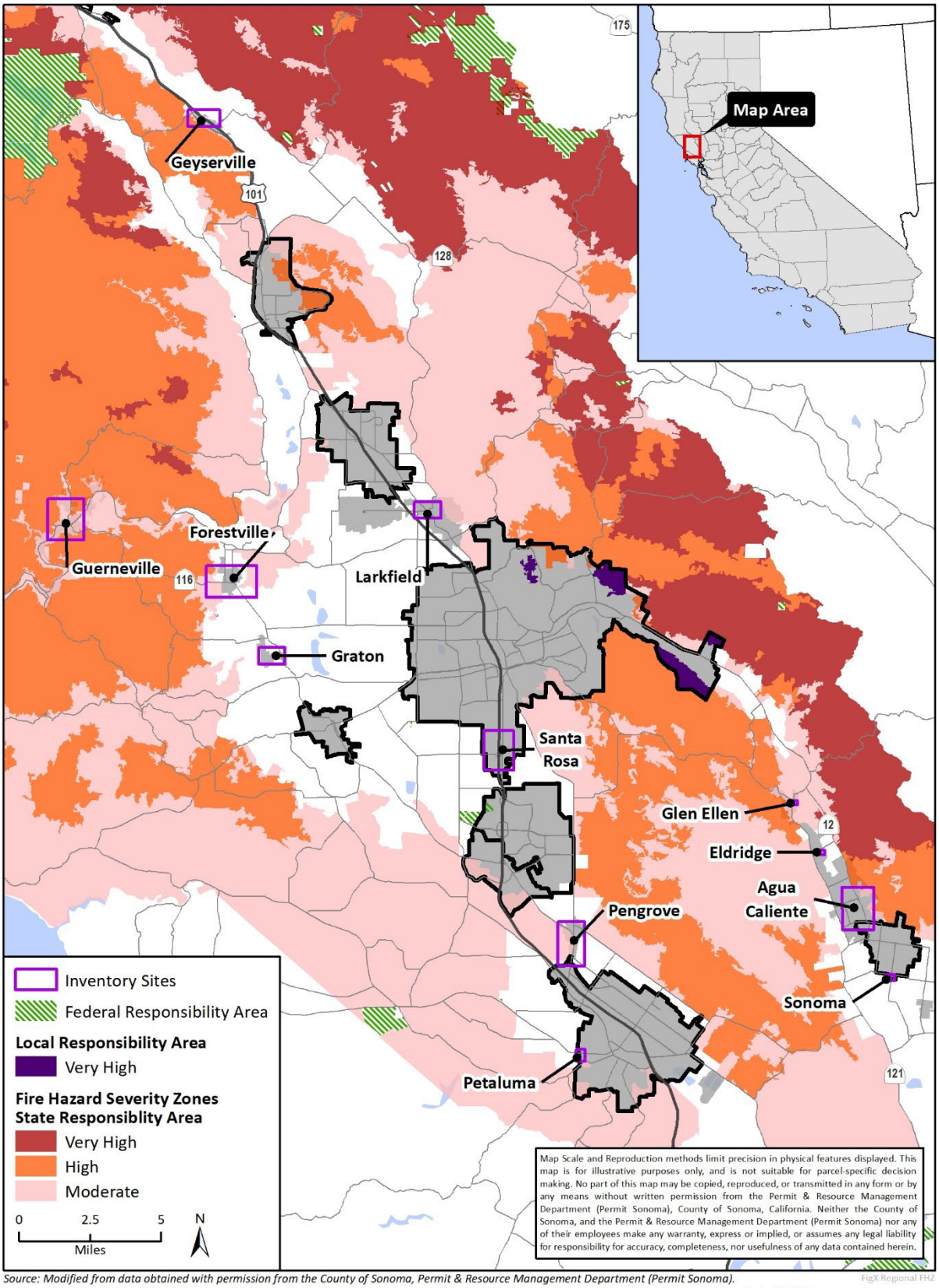

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Figure 4.19-2 Fire Hazard Severity Zones – Geyserville

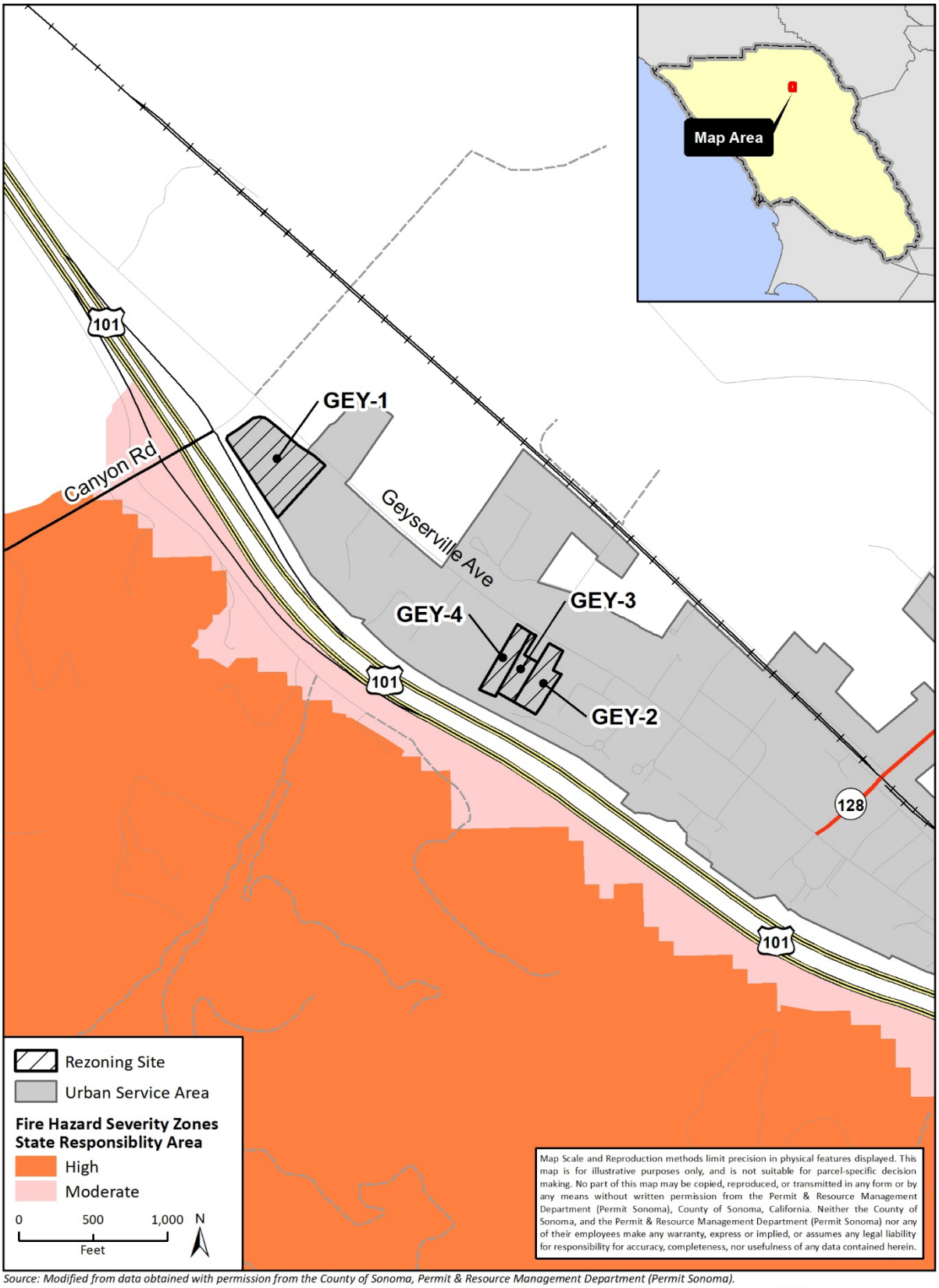

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Figure 4.19-3 Fire Hazard Severity Zones – Guerneville

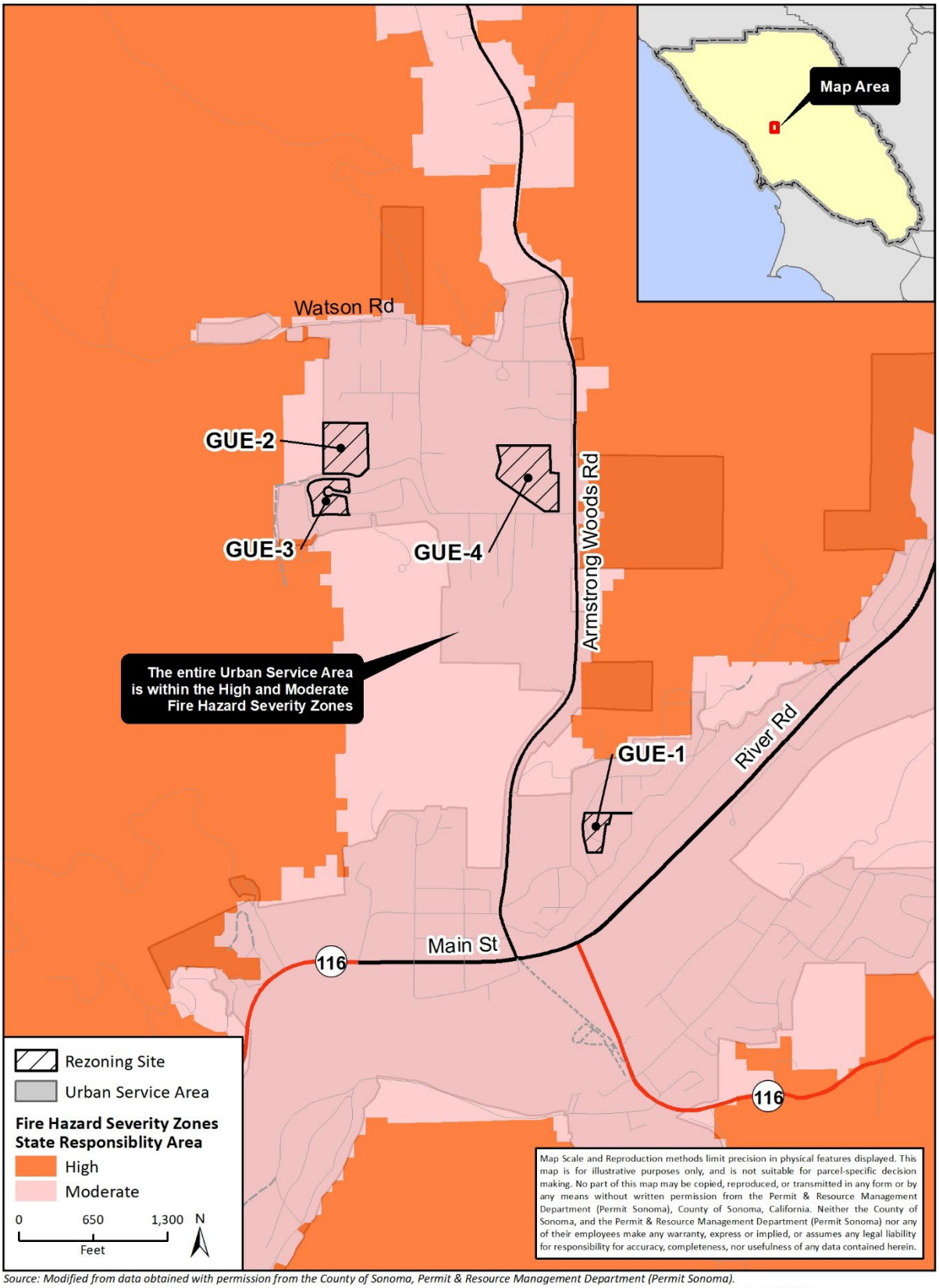

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Figure 4.19-4 Fire Hazard Severity Zones – Larkfield

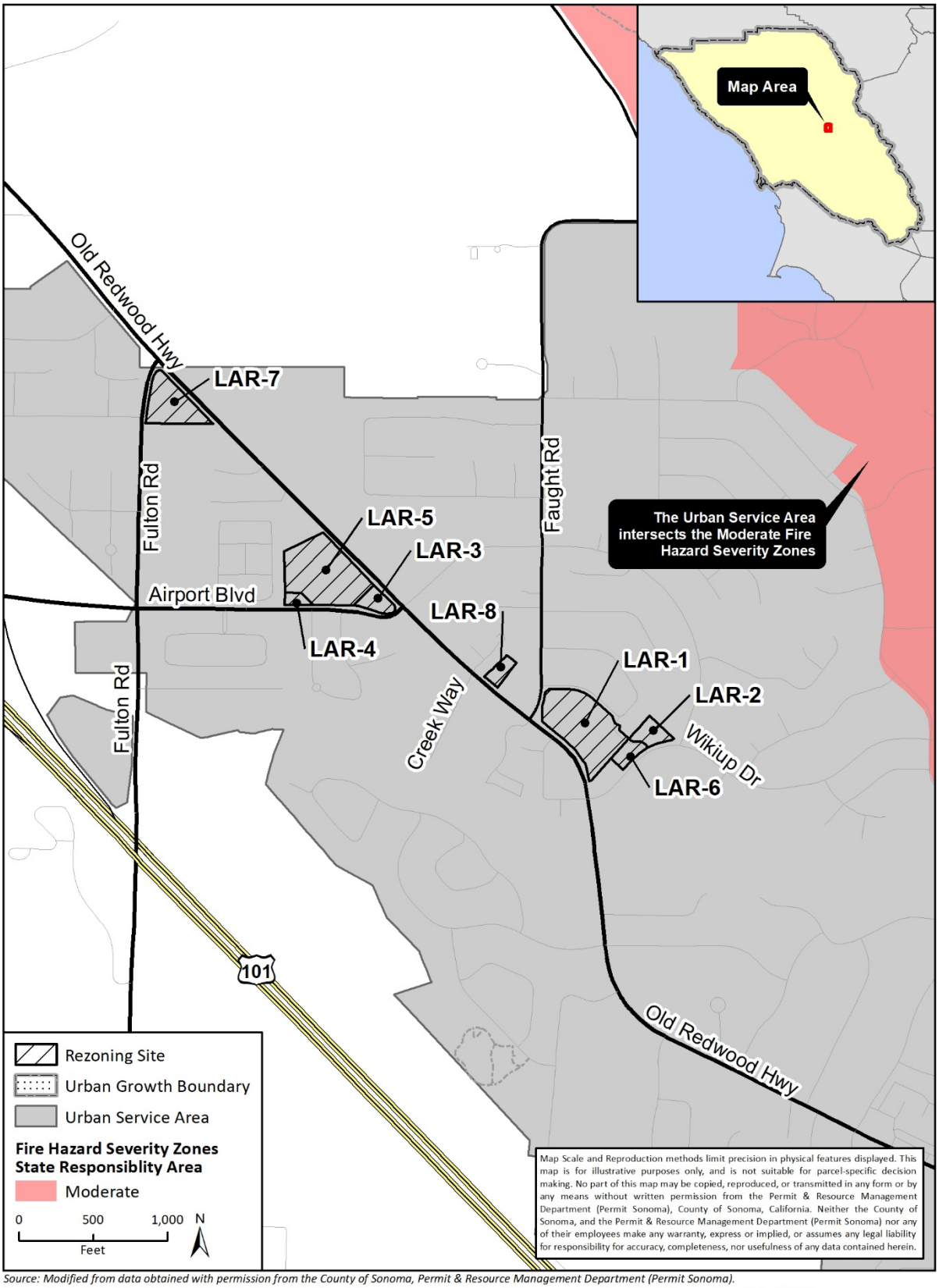

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Figure 4.19-5 Fire Hazard Severity Zones – Forestville

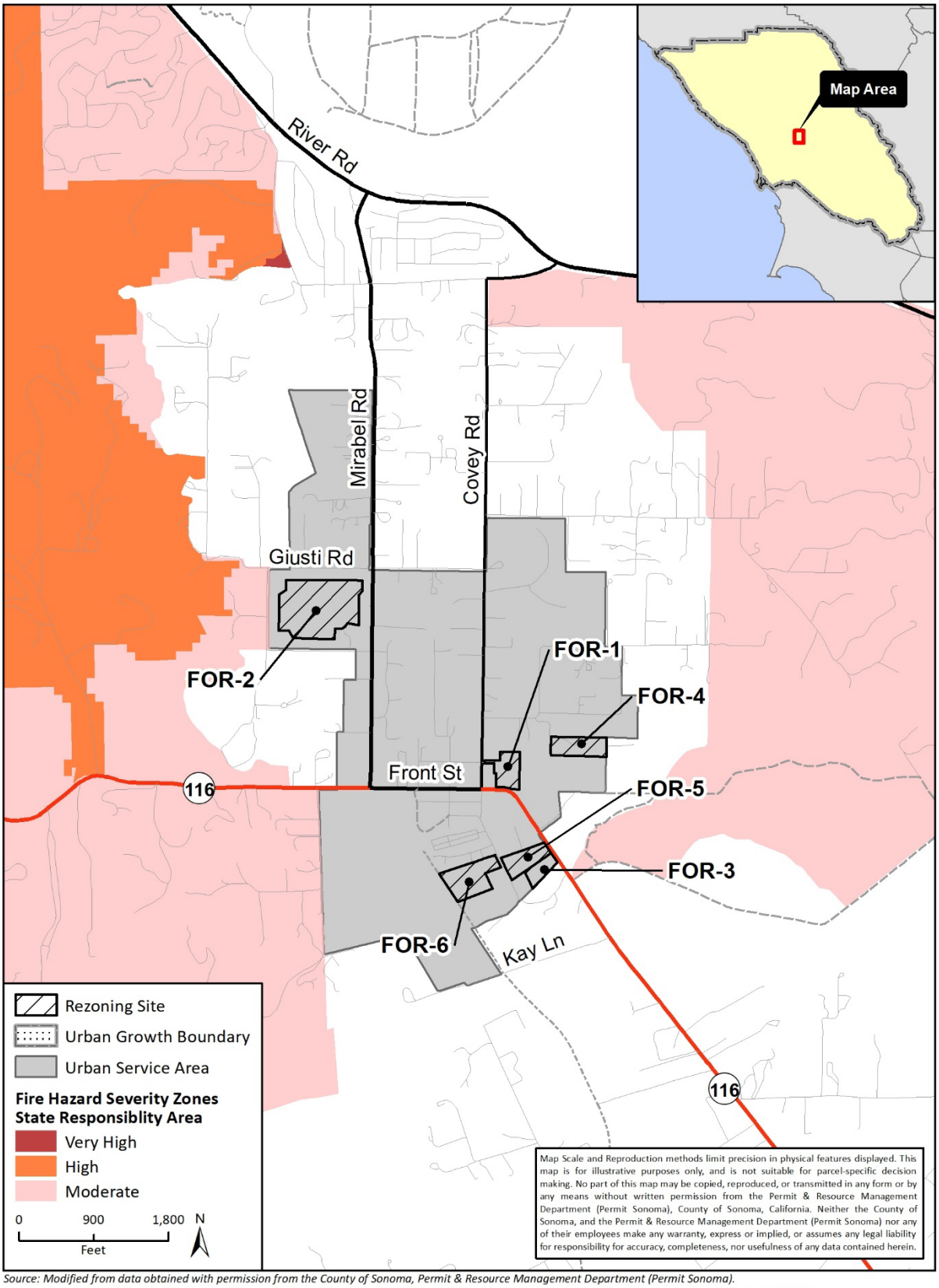

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Figure 4.19-6 Fire Hazard Severity Zones – Graton

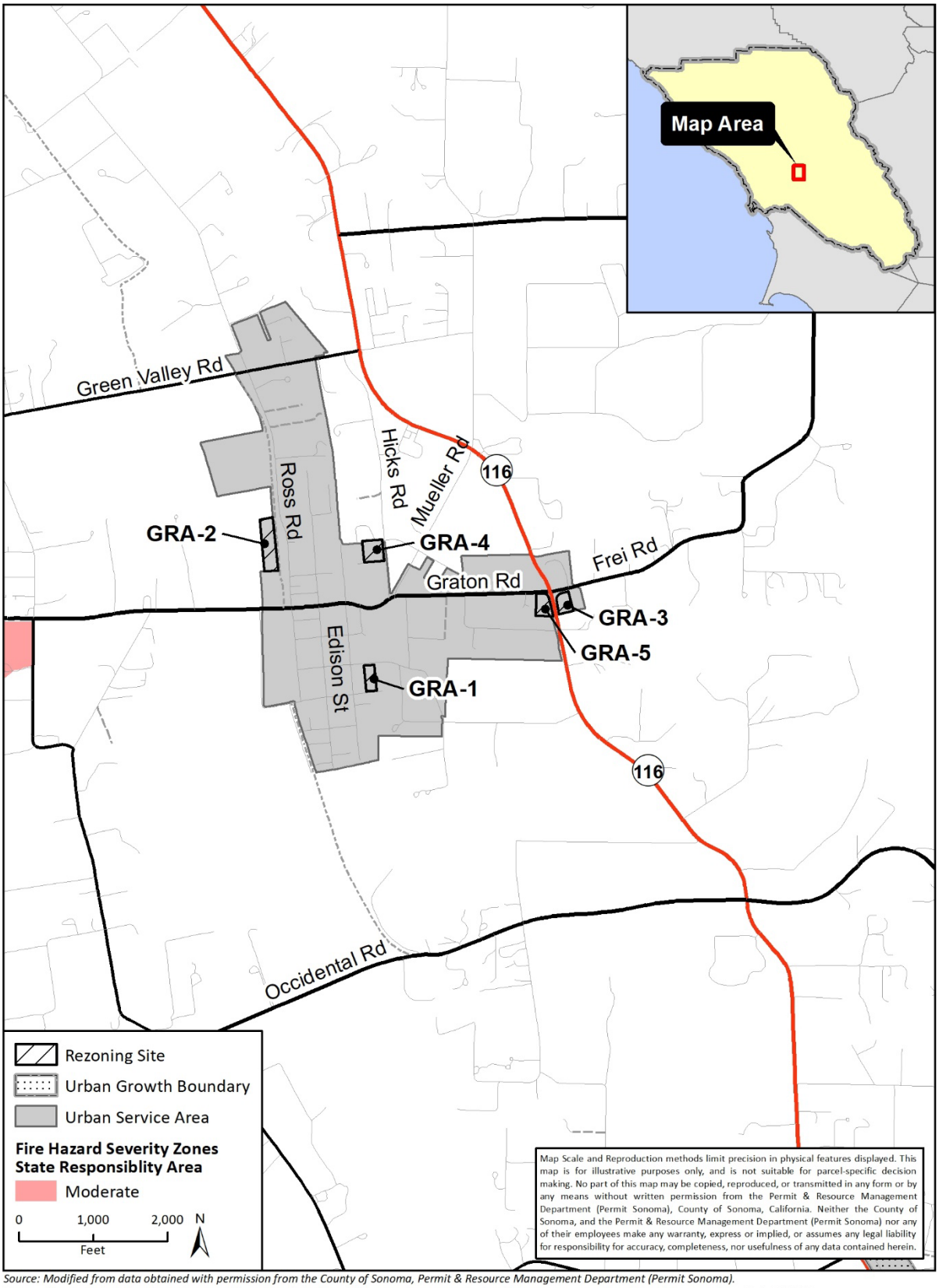

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Figure 4.19-7 Fire Hazard Severity Zones – Santa Rosa

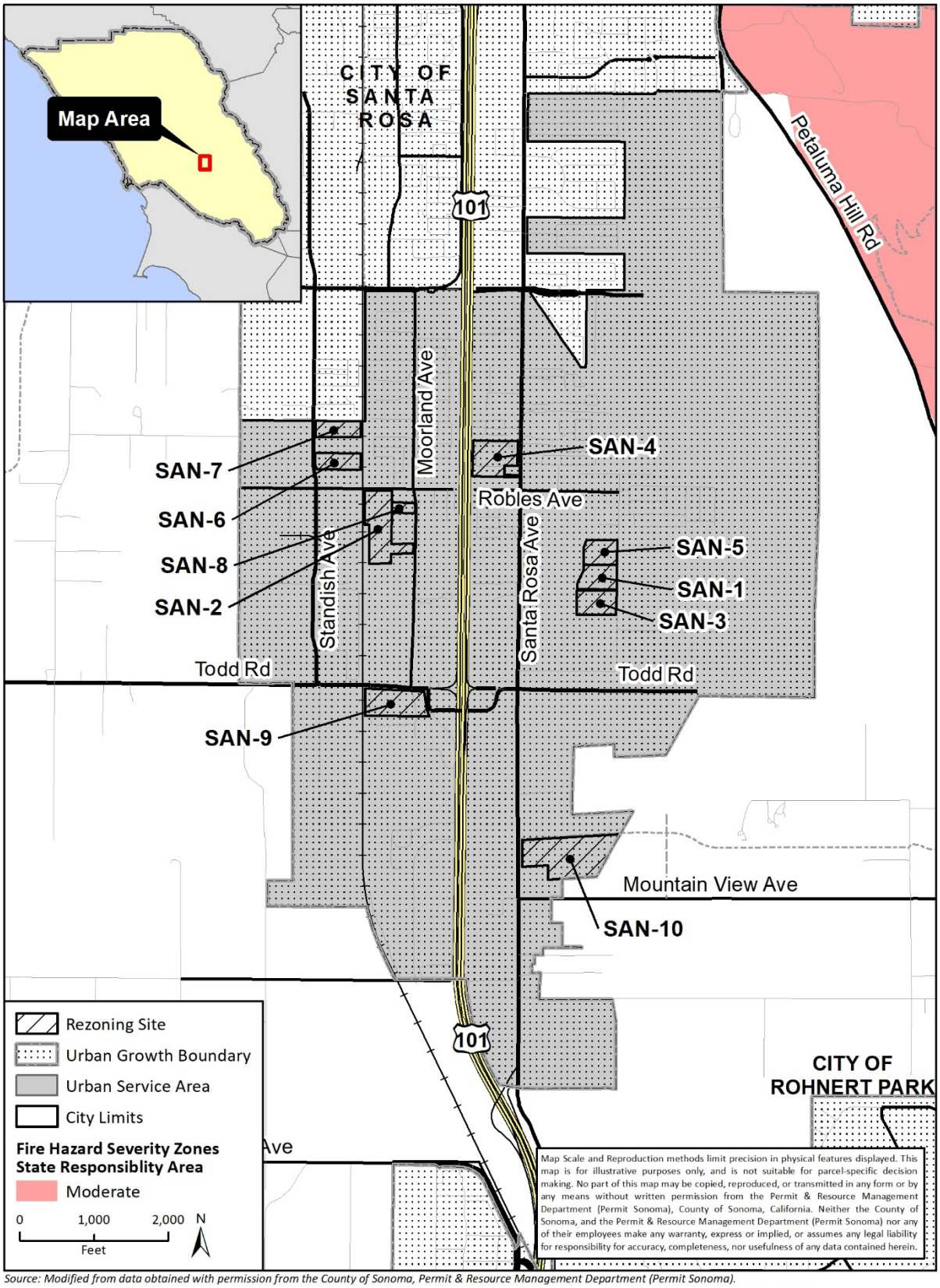

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Figure 4.19-8 Fire Hazard Severity Zones – Glen Ellen

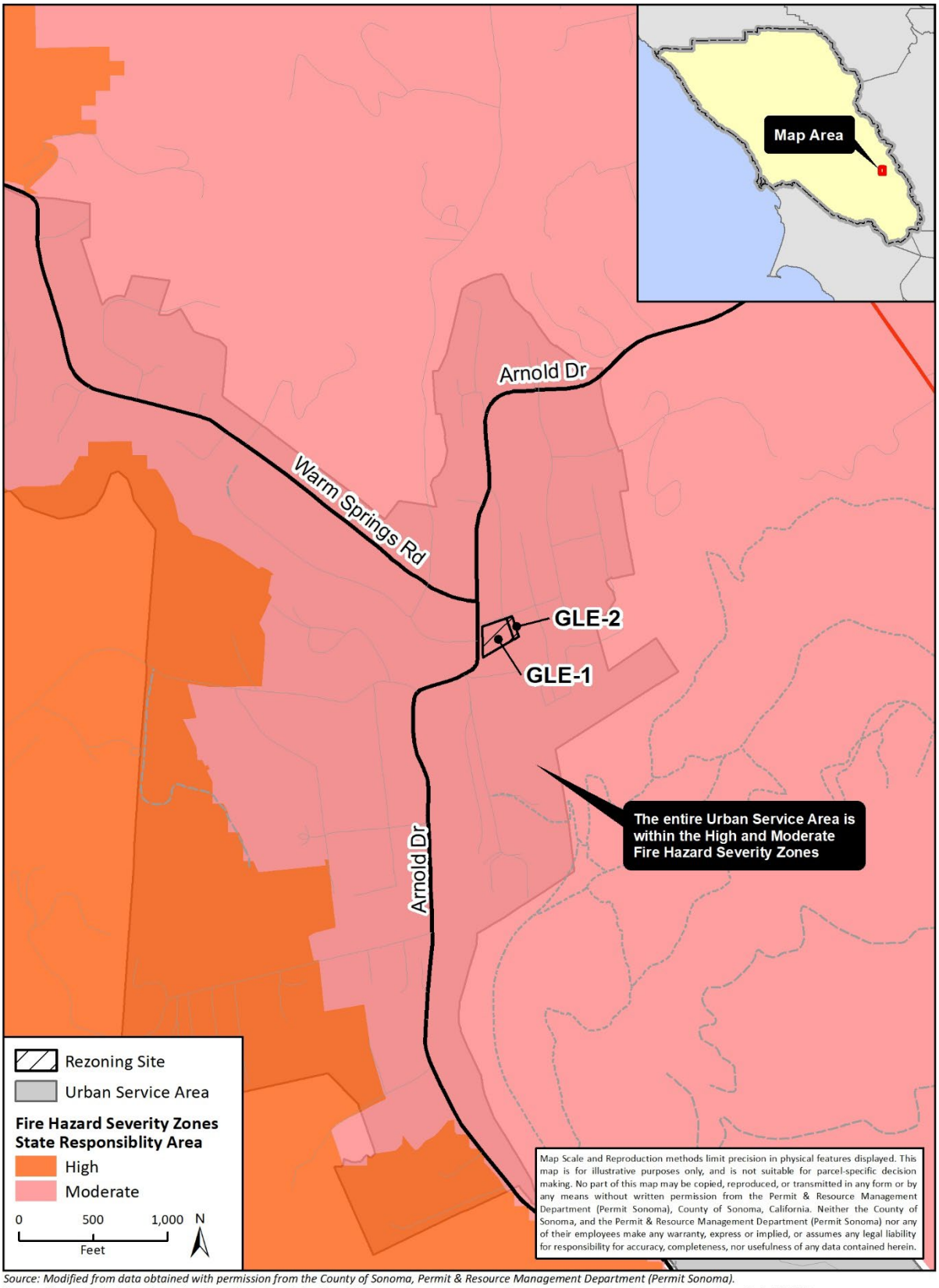

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Figure 4.19-9 Fire Hazard Severity Zones – Agua Caliente

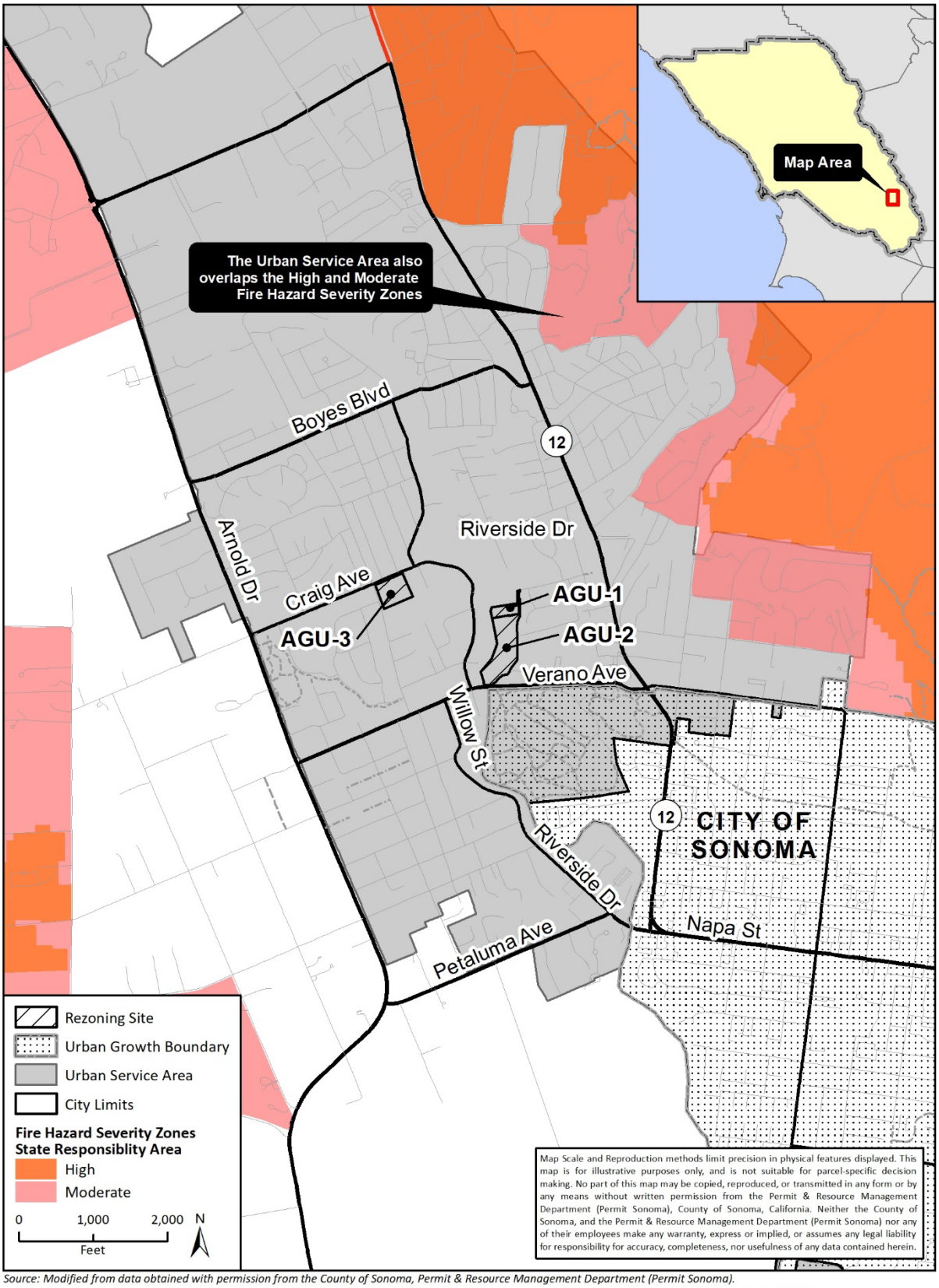

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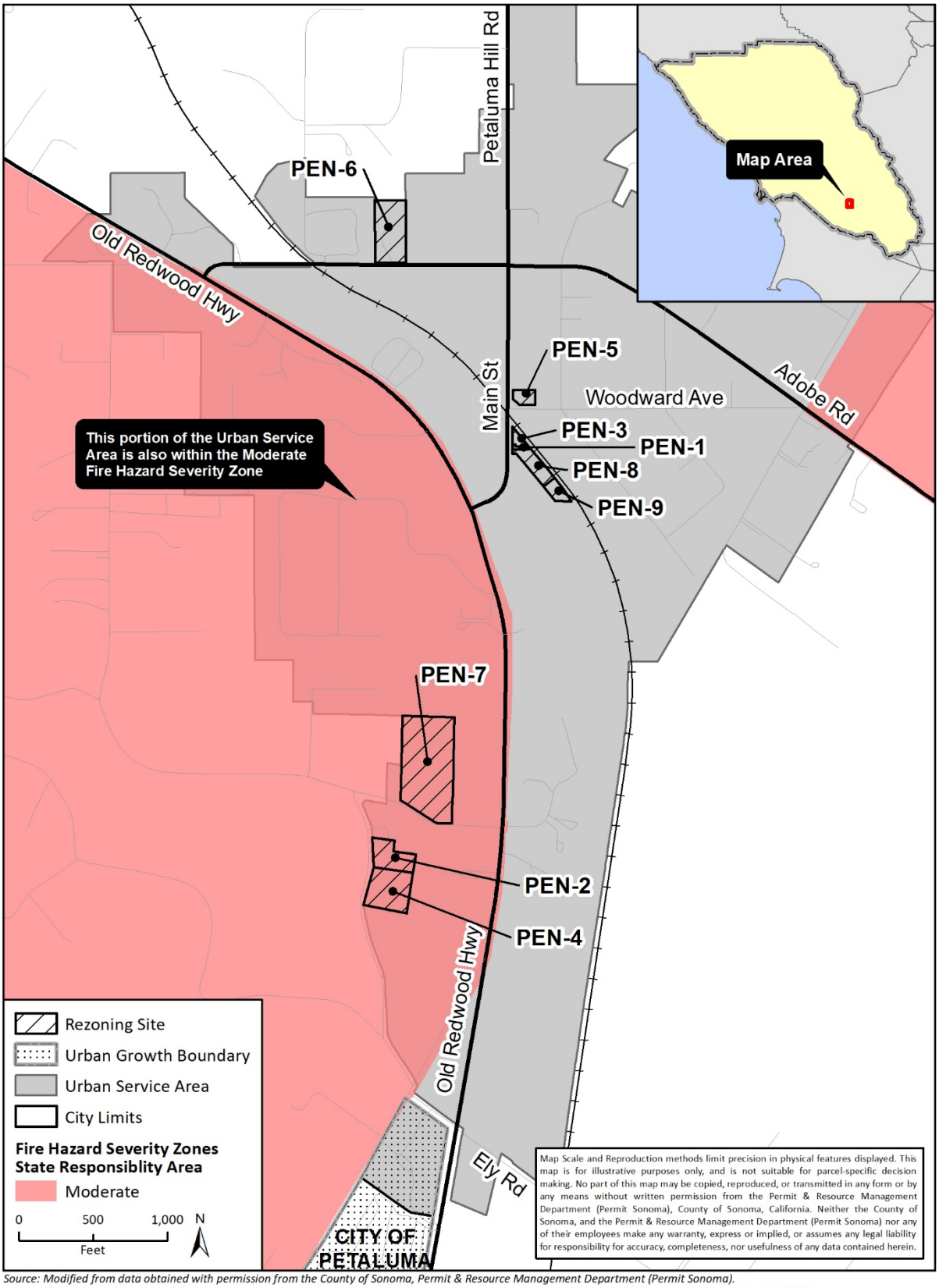
Figure 4.19-10 Fire Hazard Severity Zones – Penngrove



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
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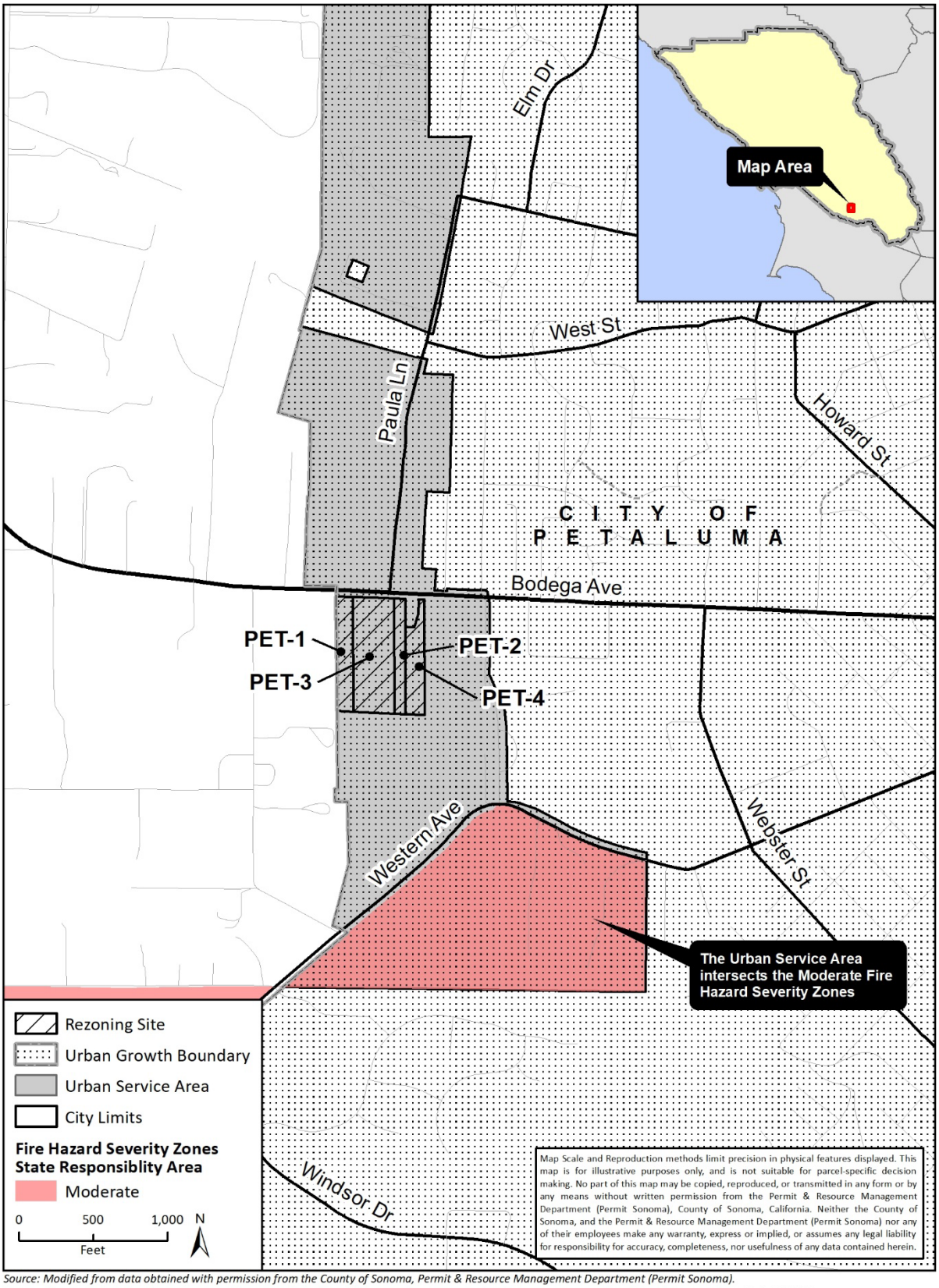
Figure 4.19-11 Fire Hazard Severity Zones – Petaluma



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
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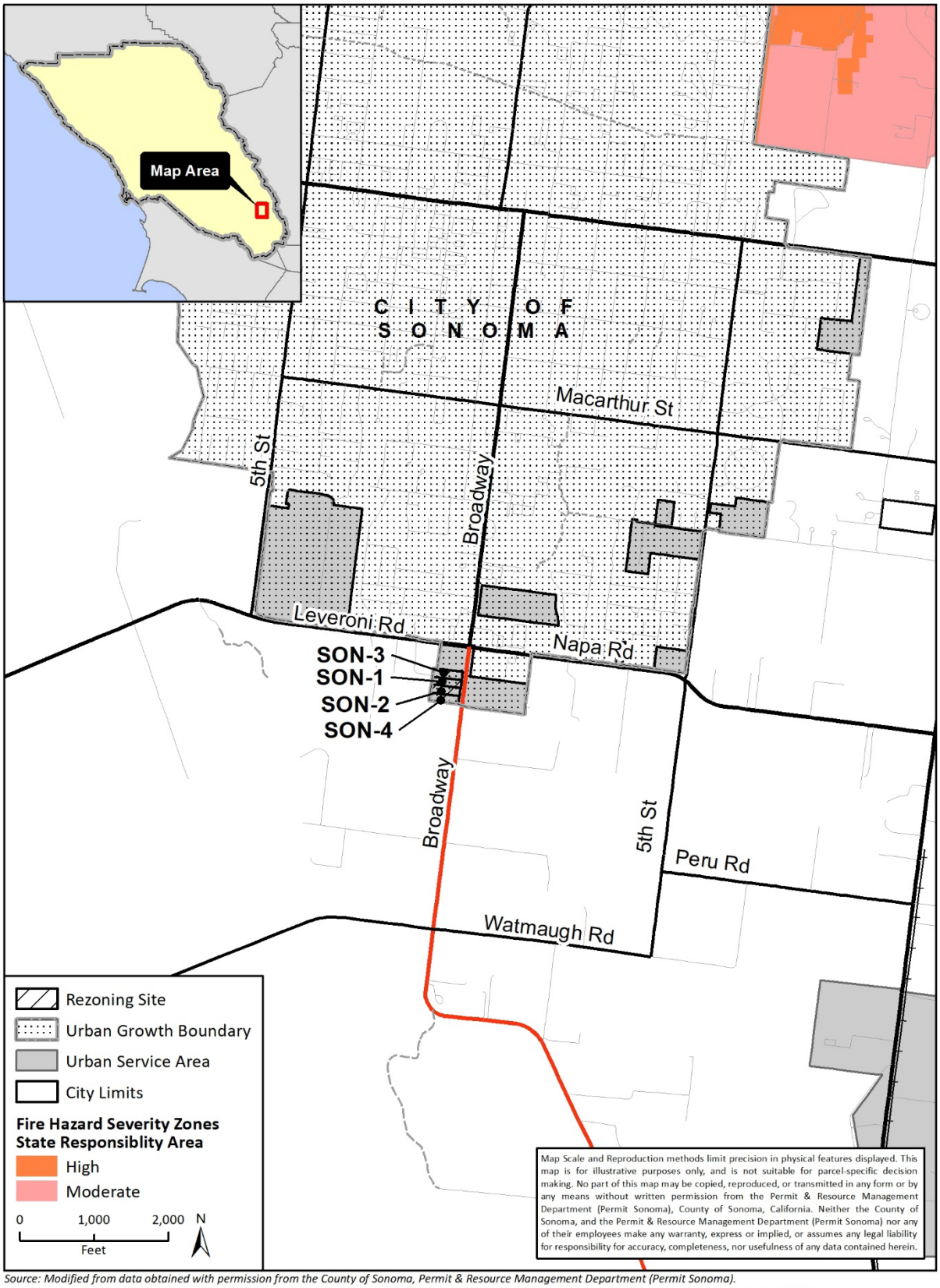
Figure 4.19-12 Fire Hazard Severity Zones – Sonoma



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri; CALFIRE.

Table 4.19-3 Rezoning Sites Distance to SRA

Rezoning Sites	Distance to Nearest SRA
GEY-1 through GEY-4	0 mile, adjacent to SRA
GUE-1 through GUE-4	0 mile, within SRA
LAR-1 through LAR-8	<1 mile to SRA
FOR-1 through FOR-6	<1 mile to SRA
GRA-1, GRA-2, GRA-4	<1 mile to SRA
GRA-3, GRA-5	1.3 mile to SRA
SAN-1, SAN-3, SAN-4, SAN-5, SAN-10	<1 mile to SRA
SAN-2, SAN-6 through SAN-9	1.1 mile to SRA
GLE-1, GLE-2	0 mile, within SRA
AGU-1 through AGU-3	<1 mile to SRA
PEN-1, PEN-3, PEN-8, PEN-9	0 mile, adjacent to SRA
PEN-2, PEN-4, PEN-7	0 mile, within SRA
PEN-5, PEN-6	<1 mile to SRA
PET-1 through PET-4	<1 mile to SRA
SON-1 through SON-4	1.7 mile to SRA

Source: National Resources Conservation Service 2020

4.19.2 Regulatory Setting

a. Federal Regulations

The Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 requires a state-level mitigation plan as a condition of disaster assistance. There are two different levels of state disaster plans: "Standard" and "Enhanced." States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act also established new requirements for local mitigation plans.

National Fire Plan

The National Fire Plan was developed in August 2000, following a historic wildfire season. Its intent is to establish plans for active response to severe wildfires and their impacts to communities while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability.

b. State Regulations

California Board of Forestry and Fire Safe Regulations

The Board of Forestry maintains the State's Fire Safe Regulations, Title 14 of the California Code of Regulations (CCR), Sections 1270-1276.04. The purpose of the Fire Safe Regulations is establishing minimum wildfire protection standards in conjunction with building, construction and development in the State Responsibility Area (SRA) and the Very High Fire Hazard Severity Zones as defined in Public Resources Code Section 51177(i). This includes requirements for road width, surface

treatments, grade, radius, turnarounds, turnouts, structures, driveways, and gate entrances that are intended to ensure safe access for emergency wildland fire equipment and civilian evacuation.

California Fire and Building Codes (2019)

The California Fire Code is Chapter 9 of CCR Title 24. It establishes the minimum requirements consistent with nationally-recognized good practices to safeguard public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structure, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The California Fire Code regulates the use, handling and storage requirements for hazardous materials at fixed facilities. The California Fire Code and the California Building Code (CBC) use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines and specialized equipment. To ensure that these safety measures are met, the California Fire Code employs a permit system based on hazard classification. The provisions of this Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout California.

More specifically, the Fire Code is included in Title 24 of the CCR. Title 24, part 9, Chapter 7 addresses fire-resistances-rated construction; CBC (Part 2), Chapter 7A addresses materials and construction methods for exterior wildfire exposure; Fire Code Chapter 8 addresses fire related Interior finishes; Fire Code Chapter 9 addresses fire protection systems; and Fire Code Chapter 10 addresses fire related means of egress, including fire apparatus access road width requirements. Fire Code Section 4906 also contains existing regulations for vegetation and fuel management to maintain clearances around structures. These requirements establish minimum standards to protect buildings located in FHSZs within SRAs and Wildland-Urban Interface (WUI) Fire Areas. This code includes provisions for ignition-resistant construction standards for new buildings.

Wildland-Urban Interface Building Standards

On September 20, 2007, the Building Standards Commission approved the Office of the State Fire Marshal's emergency regulations amending the CCR Title 24, Part 2, known as the 2007 CBC. These codes include provisions for ignition-resistant construction standards in the WUI.

Interface zones are areas with dense housing adjacent to vegetation that can burn and meeting the following criteria:

1. Housing density class 2 (one house per 20 acres to one house per 5 acres), 3 (more than one house per 5 acres to one house per acre), or 4 (more than one house per acre)
2. In Moderate, High, or Very High Fire Hazard Severity Zone
3. Not dominated by wildland vegetation (i.e., lifeform not herbaceous, hardwood, conifer, or shrub)
4. Spatially contiguous groups of 30-meter cells[1] that are 10 acres and larger

[1] Note that "30-meter cells" refers to raster data, and indicates data is presented as 30-meter by 30-meter squares.

Intermix zones are housing development interspersed in an area dominated by wildland vegetation and must meet the following criteria:

1. Not interface
2. Housing density class 2
3. Housing density class 3 or 4, dominated by wildland vegetation
4. In moderate, high, or very high fire hazard severity zone
5. Improved parcels only
6. Spatially contiguous groups of 30-meter cells 25 acres and larger

Influence zones have wildfire-susceptible vegetation up to 1.5 miles from an interface zone or intermix zone (CAL FIRE 2019b).

The California Fire Plan

The Strategic Fire Plan for California is the State's road map for reducing the risk of wildfire. The most recent version of the Plan was finalized in August 2018 and directs each CAL FIRE Unit to revise and update its locally-specific Fire Management Plan (CAL FIRE 2018). These plans assess the fire situation within each of the 21 CAL FIRE units and six contract counties. These plans address wildfire protection areas, initial attack success, assets and infrastructure at risk, pre-fire management strategies, and accountability within their geographical boundaries.

California Office of Emergency Services

The California Office of Emergency Services (CalOES) prepares the State of California Multi-Hazard Mitigation Plan (SHMP). The SHMP identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is federally required under the Disaster Mitigation Act of 2000 for the State to receive Federal funding. The Disaster Mitigation Act of 2000 requires a State mitigation plan as a condition of disaster assistance.

State Emergency Plan

The foundation of California's emergency planning and response is a statewide mutual aid system which is designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with a given situation.

The California Disaster and Civil Defense Master Mutual Aid Agreement (California Government Code Sections 8555–8561) requires signatories to the agreement to prepare operational plans to use within their jurisdiction, and outside their area. These plans include fire and non-fire emergencies related to natural, technological, and war contingencies. The State of California, all State agencies, all political subdivisions, and all fire districts signed this agreement in 1950.

Section 8568 of the California Government Code, the "California Emergency Services Act," states that "the State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof." The Act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a City Manager. The provisions of the act are further reflected and expanded on by appropriate local emergency ordinances. The Act further describes the function and operations of government at all levels during extraordinary emergencies, including war.

All local emergency plans are extensions of the State of California Emergency Plan. The State Emergency Plan conforms to the requirements of California's Standardized Emergency Management System (SEMS), which is the system required by Government Code 8607(a) for managing emergencies involving multiple jurisdictions and agencies (CalOES 2020). The SEMS incorporates the functions and principles of the Incident Command System (ICS), the Master Mutual Aid Agreement, existing mutual aid systems, the operational area concept, and multi-agency or inter-agency coordination. Local governments must use SEMS to be eligible for funding of their response-related personnel costs under state disaster assistance programs. The SEMS consists of five organizational levels that are activated as necessary, including: field response, local government, operational area, regional, and state. CalOES divides the state into several mutual aid regions. The County of Sonoma is located in Mutual Aid Region II, which includes Del Norte, Humboldt, Mendocino, Sonoma, Lake, Napa, Marin, Solano, Contra Costa, San Francisco, San Mateo, Alameda, Santa Clara, Santa Cruz, San Benito, and Monterey Counties (CalOES 2019).

Government Code Sections 65302 and 65302.5, Senate Bill 1241 (Kehoe) of 2012

Senate Bill (SB) 1241 requires cities and counties to address fire risk in SRAs and Very High FHSZs in the safety element of their general plans. The bill also amended CEQA to direct amendments to the CEQA Guidelines Appendix G environmental checklist to include questions related to fire hazard impacts for projects located in or near lands classified as SRAs and Very High FHSZs. In adopting these Guidelines amendments, the Governor's Office of Planning and Research recognized that generally, low-density, leapfrog development may create higher wildfire risks than high-density, infill development. [2]

California Public Utilities Commission General Order 166

General Order 166 Standard 1.E requires that investor-owned utilities (IOU) develop a Fire Prevention Plan which describes measures that the electric utility will implement to mitigate the threat of power-line fires generally. Additionally, this standard requires that IOUs outline a plan to mitigate power line fires when wind conditions exceed the structural design standards of the line during a Red Flag Warning in a high fire threat area. Fire Prevention Plans created by IOUs are required to identify specific parts of the utility's service territory where the conditions described above may occur simultaneously. Standard 11 requires that utilities report annually to the California Public Utilities Commission (CPUC) regarding compliance with General Order 166 (CPUC 2017b). In compliance with Standard 1.E of this General Order, Pacific Gas and Electric Company published their Annual Report on Compliance with General Order 166 on October 31, 2019. The previous version of this Annual Report, which covered Compliance Period July 1, 2017 through June 30, 2018, contained an interim fire threat map showing very high fire threats near existing overhead lines along the eastern border of Sonoma County. None of the very high fire threats near existing overhead lines were directly adjacent to any of the Rezoning Sites (CPUC 2018).

c. Regional and Local

Sonoma County Community Wildfire Protection Plan

The Sonoma County Community Wildfire Protection Plan was developed with input from many organizations, including state and local fire departments, federal agencies, community groups, and

[2] "Leapfrog development" describes the construction of new development at a distance from existing developed areas, with undeveloped land between the existing and new development.

land management agencies. The purpose of the Sonoma County Community Wildfire Protection Plan is to help reduce the potential loss of human life and damage to property, natural and cultural resources within Sonoma County due to wildfire. The plan describes the wildfire risk and potential throughout the County, designates WUI areas, discusses assets at risk throughout the County, provides mitigation strategies, and discusses resources available (Fire Safe Sonoma 2016).

Sonoma County Multi-Jurisdictional Hazard Mitigation Plan

The Sonoma County Multi-Jurisdictional Hazard Mitigation Plan incorporates wildfire hazard mitigation principles and practices into the routine government activities and functions of the County. The Plan recommends specific actions that are designed to protect people and community assets from losses to those hazards that pose the greatest risk. Some mitigation programs and activities identified in the Plan include creating and maintaining defensible space around structures, using fire-resistant building materials, and clearing potential fuels on property such as dry underbrush and diseased trees (County of Sonoma 2021).

Sonoma County Emergency Operations Plan

The County's Emergency Operations Plan addresses the planned response to extraordinary emergency situations associated with large-scale disasters, and includes all cities, special districts, and unincorporated areas of the County. The plan aims to provide effective safety measures and reduce property loss and damage to the environment through management and coordination of emergency response operations, establishing priorities, and spreading information to the public.

Sonoma County General Plan

The County's General Plan includes goals and policies to reduce damage from wildfires, including:

Goal PS-3: Prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires.

Objective PS-3.1: Continue to use complete data on wildland and urban face hazards.

Objective PS-3.2: Regulate new development to reduce the risks of damage and injury from known fire hazards to acceptable levels.

Objective PS-3.3: Use the Sonoma County Hazard Mitigation Plan to help reduce damages from wildland fire hazards.

Policy PS-3a: Continue to use available information on wildland and structural fire hazards.

Policy PS-3b: Consider the severity of natural fire hazards, potential damage from wildland and structural fires, adequacy of fire protection and mitigation measures consistent with the Public Safety Element in the review of projects.

Policy PS-3g: Encourage continued operation of California Department of Forestry and Fire Protection (CalFire) programs for fuel breaks, brush management, controlled burning, revegetation, and fire roads.

Policy PS-3j: Provide fire hazard information signs in Very High or High Fire Hazard Severity Zones in a manner consistent with Area Plans and that does not degrade Scenic Corridors and scenic views.

Policy PS-3k: Work with the California Department of Forestry and Fire Protection (CalFire) to identify areas of high fire fuel loads and take advantage of opportunities to reduce those fuel loads, particularly in Very High or High Fire Hazard Severity Zones.

GOAL LU-7: Prevent unnecessary exposure of people and property to environmental risks and hazards. Limit development on lands that are especially vulnerable or sensitive to environmental damage.

Objective LU-7.1: Restrict development in areas that are constrained by the natural limitations of the land, including but not limited to fire hazards.

Policy LU-7d: Avoid new commercial, industrial, and residential land use designations in areas subject to "high" or "very high" fire hazards, as identified in the Public Safety Element, unless the combination of fuel load, access, water supply, and other project design measures will reduce the potential fire related impacts of new development to insignificant levels.

The General Plan Public Safety Element notes that to reduce the risk of fire damage in rural areas, the types and intensities of land uses should be limited. Wildfire hazards may be reduced by mitigation measures such as the removal of vegetation and installation of dependable water systems, but the hazards cannot be eliminated entirely. Rural development should be most restricted where natural fire hazards are high, fire protection is limited, and inadequate road access prevents timely response by firefighting personnel and rapid evacuation by residents. As a result, the General Plan land use densities restrict land uses and density in hazardous areas, thereby limiting the number of people and buildings exposed to hazards.

Sonoma County Fire Prevention Division

The Fire Prevention and Hazardous Materials Division of Permit Sonoma is responsible for programs, procedures, and projects for preventing the outbreak of fires within the unincorporated areas of the County. The goal of this Division is to minimize the danger to persons and damage to property caused by fires that do occur. In addition to code adherence, Fire Prevention Division staff are responsible for hazardous materials incident response, fire investigations, emergency scene management support at emergencies, and review of new development permit applications.

Sonoma County Department of Emergency Management

The Sonoma County Department of Emergency Management is responsible for the mitigation, preparedness, planning, coordination of response, and recovery activities related to county emergencies and disasters. The Department serves as the primary coordination point for emergency management's activities affecting more than one jurisdiction, and the unincorporated areas of the County. The Department became an independent County department in July 2019.

Sonoma County Code

The Sonoma County Code, Chapter 13, Sonoma County Fire Code, outlines the California Fire Code, as adopted with local amendments. Article V of Chapter 13 establishes minimum fire safe standards for development within the unincorporated County. Chapter 13 also requires fire sprinklers in residential developments and Chapter 13A requires removal of hazardous vegetation and combustible material from around the exterior of improvements in unincorporated areas of the County.

4.19.3 Impact Analysis

a. Significance Thresholds

For purposes of this Program EIR, development facilitated by the project may have a significant adverse impact if the Rezoning Sites are in or near (within 2 miles of) a SRA or FHSZ and would do any of the following:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire
3. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment
4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes

b. Methodology

Impacts related to wildfire hazards and risks were evaluated using FHSZ mapping for Sonoma County, aerial imagery, and topographic mapping. Additionally, weather patterns related to prevailing winds and precipitation trends were evaluated as they relate to the spread and magnitude of wildfire. CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents. Consequently, impacts under the thresholds identified below would only be considered significant if the proposed project risks exacerbating those existing environmental conditions.

c. Project Impacts and Mitigation Measures

Threshold:	If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact WFR-1 THE PROJECT INCLUDES REZONING SITES THAT ARE IN OR NEAR AN SRA OR VERY HIGH FHSZS, BUT DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT SUBSTANTIALLY IMPAIR AN ADOPTED EMERGENCY RESPONSE OR EVACUATION PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would involve adopting the proposed Housing Element Update, which includes rezoning of sites not currently zoned for housing. The analysis herein focuses on the potential for physical environmental impacts, and therefore focuses on the Rezoning Sites, because analysis of the locations and impacts of other development facilitated by the Housing Element Update would be speculative. As shown in Figure 4.19-1 through Figure 4.19-12, many of the Rezoning Sites are located in or within 2 miles of areas that CAL FIRE has mapped as Very High FHSZ or SRA. The project would result in development of these sites with higher-density housing. Main transportation routes are identified in the County's Emergency Operations Plan (2022), including Highway 101, State Route 12, State Route 116, State Route 37, State Route 128, and State Route 1. No designated evacuation routes are presented in the Emergency Operations Plan, as evacuation practices may vary depending on the type, severity, and availability of primary roadways. In an emergency

evacuation scenario, many of the main transportation routes identified in the plan and listed above would be relied on as evacuation routes assuming viability of those routes. The sites would be accessed by preexisting roadways and would not impair the use of emergency evacuation routes through the modification of existing roadways (either through elimination, reduction in width, or blockage). While the increase in population that would result from project implementation is beyond the current County General Plan growth projections, the Rezoning Sites are located in urban service areas already designated in the County's General Plan for urban growth. The County is required by State law to identify adequate sites for new housing to accommodate its RHNA for the 6th Housing Element Cycle, as described in Section 4.14, *Population and Housing*. The project would help to meet the County's housing need and would be consistent with its RHNA allocation for the 6th Housing Element cycle. The Rezoning Sites are located in existing service areas and are adequately served by emergency services, and the population growth in these areas would not put unanticipated strain on emergency evacuations plans or routes. Therefore, the population increase encouraged by the project would not impair adopted emergency response and emergency evacuation plans. Additionally, as described in Section 4.15, *Public Services and Recreation*, the project would not result in the need for new or expanded emergency services, including police and fire protection. Therefore, the implementation of emergency response procedures would not be affected. The County's Emergency Operations Plan establishes the emergency management organization for emergency response, establishes operational concepts associated with emergency management, and provides a flexible platform for planning emergency response in the County. Development facilitated by the project would be constructed in accordance with federal, state, regional, and local requirements, which are intended to ensure the safety of county residents and structures to the extent feasible. Compliance with these standard regulations would be consistent with the County's Emergency Operations Plan. The project would not impair an adopted emergency response or emergency evacuation plan and impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
Threshold:	If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
Threshold:	If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impact WFR-2 THE PROJECT INCLUDES REZONING SITES THAT ARE IN OR NEAR MODERATE, HIGH, AND VERY HIGH FHSZS. DEVELOPMENT FACILITATED BY THE PROJECT WOULD EXPOSE PROJECT OCCUPANTS AND STRUCTURES TO WILDFIRE RISKS FOR SITES LOCATED IN OR NEAR (WITHIN 2 MILES OF) SRAS OR VERY HIGH FHSZS. WILDFIRE RISK WOULD BE SIGNIFICANT AND UNAVOIDABLE.

As shown in Figure 4.19-1 through Figure 4.19-12 and described in Table 4.19-2, CAL FIRE has mapped all of the Rezoning Sites as within or near (within 2 miles of) a Very High FHSZ or SRA. Development facilitated by the project would increase the potential buildout of the Rezoning Sites, concentrating this population growth in designated urban service areas of the Unincorporated County, where the risk of wildfire is generally less than in more rural areas where fuels are more abundant. However, as evidenced by recent wildfires in the County, urban areas, particularly those on the outer edges of urban development, are also susceptible to wildfires, despite the having less abundant typical wildfire fuels.

Severe wildfires damage the forest or shrub canopy, the plants below, as well as the soil. In general, this can result in increased runoff after intense rainfall, which can put homes and other structures below a burned area at risk of localized floods and landslides. Some of the Rezoning Sites are located near steep slopes, known landslide-susceptible areas, and vegetative wildfire fuels, as described in Section 4.19.1(a), *Overview of Wildfire*, above. If a severe wildfire were to occur adjacent to those locations, structures directly downslope (including some Rezoning Sites) may be at risk of flooding or landslides, and project residents would be exposed to wildfire pollutants. If a fire were to occur in more flat and urbanized areas, the risk of flooding or landslides afterward would be negligible because of the nearly flat topography and because little soil would be exposed due to the developed conditions. Therefore, development of Rezoning Sites located in more flat or urban settings, including SAN-1 through SAN-10, and SON-1 through SON-4, as identified under Section 4.19.1, *Setting*, would not expose project occupants or structures to significant risks, including downslope or downstream flooding or landslides.

Access to Rezoning Sites FOR-2, FOR-4, GRA-2, AGU-1, and AGU-2 currently does not meet County road standards of 20 feet in width or greater. Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways could be required. Those improvements would require a County encroachment permit if on a public right-of-way; however, widening County roads would not exacerbate fire risk.

Road widening could result in temporary or ongoing impacts to the environment through vegetation removal and ground-disturbing activities. Given that road widening locations have not been identified, it would be speculative to analyze potential impacts at this time. However, if it is determined that road widening is needed to access Rezoning Sites for future development, road widening would require site-specific CEQA compliance that could include additional mitigation measures for aesthetics, biological resources, cultural and tribal cultural resources, among other issues.

As described in Section 4.18, *Utilities and Service Systems*, development facilitated by the project would not require the installation of new power line infrastructure, and therefore would not exacerbate fire risk on that basis. The project would increase the density of development within the Rezoning Sites, with new structures and on-site infrastructure which would be constructed to current fire and building codes and safety standards. Furthermore, as noted in Section 4.19.2, *Regulatory Setting*, increases in density, such as those from the project have also been shown to reduce fire risk.

The project would result in the development of residential structures on various sites throughout the County, including sites near Geyserville, Guerneville, Forestville, Glen Ellen, and Penngrove which are in proximity to woodlands, shrublands, and chaparral with flammable vegetation. New construction would also be subject to the California Fire Code, which include safety measures to minimize the threat of fire, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system and sealing any gaps around doors, windows, eaves and vents to prevent intrusion by flame or embers. Fire sprinklers would be required in residential developments (with some exceptions) per the Sonoma County Code, including the Sonoma County Fire Code (Sonoma County Code, Chapter 13). Construction would also be required to meet CBC requirements, including CCR Title 24, Part 2, which includes specific requirements related to exterior wildfire exposure. The Board of Forestry Fire Safe Regulations via CCR Title 14, set forth the minimum development standards for emergency access, fuel modification, setback, signage, and water supply, which help prevent loss of structures or life by reducing wildfire hazards. Collectively, these codes and regulations would reduce the risk of loss, injury, or death from wildfire for new residential developments encouraged by the project, but not entirely.

The project would have potentially significant wildfire impacts, because existing codes and regulations cannot fully prevent wildfires or protect project occupants and structures from risk of harm from wildfire. The project would increase the exposure of new residential development to risk of loss or damage from wildfire. Therefore, Mitigation Measure WFR-1 would be required to reduce the risk of wildfire for future development on all Rezoning Sites. Mitigation Measures WFR-2 and WFR-3, which reduce construction wildfire risk and include project siting considerations, would apply to development on all Rezoning Sites.

Mitigation Measures

WFR-1 CONSTRUCTION WILDFIRE RISK REDUCTION

The County of Sonoma shall require the following measures during project construction:

1. Construction activities with potential to ignite wildfires shall be prohibited during red-flag warnings issued by the National Weather Service for the site. Example activities include welding and grinding outside of enclosed buildings.

2. Fire extinguishers shall be available onsite during project construction. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher.
3. Construction equipment powered by internal combustion engines shall be equipped with spark arresters. The spark arresters shall be maintained pursuant to manufacturer recommendations to ensure adequate performance.

At the County's discretion, additional wildfire risk reduction requirements may be required during construction. The County shall review and approve the project-specific methods to be employed prior to building permit approval.

WFR-2 Landscape Plan Wildfire Risk Reduction

Project landscape plans shall include fire-resistant vegetation native to Sonoma County and/or the local microclimate of the site and prohibit the use of fire-prone species, especially non-native, invasive species.

WFR-3 New Structure Locations

Prior to finalizing site plans, proposed structure locations shall, to the extent feasible given site constraints, meet the following criteria:

1. Located outside of known landslide-susceptible areas; and
2. Located at least 50 feet from sloped hillsides.

If the location meets the above criteria, no additional measures are necessary. If the location is within a known landslide area or within 50 feet of a sloped hillside, structural engineering features shall be incorporated into the design of the structure to reduce the risk of damage to the structure from post-fire slope instability resulting in landslides or flooding. These features shall be recommended by a qualified engineer and approved by the County prior to the building permit approval.

Significance After Mitigation

With implementation of Mitigation Measures WFR-1, WFR-2, and WFR-3, the risk of loss of structures and the risk of injury or death due to wildfires would be reduced. These measures would make structures more fire resistant and less vulnerable to loss in the event of a wildfire. These measures would also reduce the potential for construction to inadvertently ignite a wildfire. However, it is not possible to prevent a significant risk of wildfires or fully protect people and structures from the risks of wildfires, despite implementation of mitigation. Thus, this impact would remain significant and unavoidable.

5 Other CEQA Required Discussions

This section discusses growth-inducing impacts and irreversible environmental impacts that could result from by the proposed project, in addition to the environmental impacts analyzed in Sections 4.1 to 4.19.

5.1 Growth Inducement

California Environmental Quality Act (CEQA) *Guidelines* Section 15126.2(d) requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth or the construction of additional housing. Growth does not necessarily create significant physical changes to the environment, but increases in population may tax existing facilities, requiring the construction of new facilities that could cause significant effects. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth-inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas. Future development facilitated by the project would have direct and indirect impacts on the environment including significant adverse effects. These issues are addressed, and mitigation measures are provided throughout this environmental impact report (EIR), particularly in Sections 4.1 to 4.19.

5.1.1 Population Growth

As discussed in Section 4.14, *Population and Housing*, development facilitated by the proposed project would directly generate population growth. Specifically, the project would facilitate an estimated population growth of 8,246 persons based on the maximum project-facilitated buildout of 3,312 new housing units. This population growth would exceed population and housing forecasts established in the existing General Plan, but would not introduce population beyond what is planned for and allocated to the unincorporated County by the Association of Bay Area Governments (ABAG) in the 6th cycle regional housing needs allocation (RHNA) process. This population growth would be consistent with Plan Bay Area and ABAG population forecasts. Furthermore, the unincorporated County is experiencing a housing shortage of approximately 4,000 units due to the 2017 Sonoma Complex fires, 2019 Kincade Fire, 2020 Glass Fire, and 2020 LNU Lightning Complex fires (California Department of Forestry and Fire Protection 2019, 2020; Graff 2020).

Moreover, as discussed in Section 4.3, *Air Quality*, buildout under the proposed rezoning would not generate air quality emissions that would result in a significant impact. Additionally, the project does not involve the expansion of existing urban service areas or extension of infrastructure outside of existing urban service areas; rather, it involves increased density within established urban service areas, which has been analyzed in detail throughout this EIR. Therefore, population growth associated with the project would not result in significant long-term physical environmental effects, as described throughout Section 4.

5.1.2 Economic Growth

The proposed project would generate temporary employment opportunities during construction. Because construction workers would be expected to be drawn from the existing regional work force, project construction would not be growth-inducing from an employment standpoint. The proposed project would not be expected to induce substantial economic expansion to the extent that direct physical environmental effects would result.

5.1.3 Removal of Obstacles to Growth

The Rezoning Sites are located in General Plan-designated urban service areas that are served by existing infrastructure. The project would not result in sewer or water services being extended outside existing urban service areas. As discussed in Section 4.18, *Utilities and Service Systems*, and Section 4.16, *Transportation*, existing infrastructure would be adequate to serve the project in most locations. Mitigation measures would be required for some sites. Improvements to water, sewer, and drainage connection infrastructure would be needed at some of the Rezoning Sites (including expanded pipeline and potentially new pumps) but would be sized to specifically serve the individual project and site. These water and sewer utility extensions would be limited in extent and would be contained within designated urban service areas. These extensions would not result in additional growth surrounding the Rezoning Sites, as future development in urban service areas is already anticipated in the County. No new roads would be required. Because the project would facilitate development within already established urbanized areas, project implementation would not remove an obstacle to growth.

5.2 Irreversible Environmental Effects

CEQA Guidelines Section 15126.2(c) requires EIRs contain a discussion of significant irreversible environmental changes. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the proposed project.

The proposed rezoning would facilitate infill residential development on underdeveloped sites in unincorporated Sonoma County. Construction and operation of development facilitated by the project would involve an irreversible commitment of construction materials and non-renewable energy resources. Development would involve the use of building materials and energy, some of which are non-renewable resources, to construct new residential buildings and associated infrastructure and landscaping. Consumption of these resources would occur with any development in the region and are not unique to the proposed project.

Development facilitated by the proposed project would also irreversibly increase local demand for non-renewable energy resources such as petroleum products. However, development facilitated by the project would be subject to Mitigation Measure GHG-1, which prohibits the use of gas appliances and plumbing, and increasingly efficient building design would offset this demand to some degree by reducing energy demands of the project. As described in Section 4.6, *Energy*, the project would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6, of the California Code of Regulations, *California's Energy Efficiency Standards for Residential and Nonresidential Buildings*) and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California, and the Green Building Standards Code requires solar access, natural ventilation, and

stormwater capture. Consequently, the project would not use unusual amounts of energy or construction materials and impacts related to consumption of non-renewable and renewable resources would be less than significant. Again, consumption of these resources would occur with any development in the region and is not unique to the proposed project.

5.2.1 Significant and Unavoidable Impacts

Additional vehicle trips associated with the proposed project would incrementally increase local traffic and regional air pollutant and greenhouse gas emissions. Section 4.8, *Greenhouse Gas Emissions*, and Section 4.16, *Transportation*, conclude that long-term transportation and greenhouse gas impacts associated with the proposed project would remain significant and unavoidable even with the incorporation of mitigation measures. These are considered irreversible environmental effects.

Although vehicle trips in the County would be increased by the proposed project, as discussed in Section 4.3, *Air Quality*, development facilitated by the project would not generate air quality emissions that would result in a significant impact.

The project would also require a commitment of law enforcement, fire protection, wastewater treatment, and solid waste disposal services. As discussed in Section 4.15, *Public Services and Recreation*, and Section 4.18, *Utilities and Service Systems*, impacts to these service systems would either not be significant or would be reduced to less than significant with implementation of mitigation measures. However, impacts to water service systems would be significant and unavoidable because there is not sufficient evidence to determine that Rezoning Site GEY-1 through GEY-4 would be adequately served by California American Water – Geyserville.

CEQA requires decision makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. The analysis contained in this EIR concludes that the proposed project would result in significant and unavoidable aesthetic, cultural resources, greenhouse gas emissions, hazards, transportation, utilities, and wildfire impacts. Although development facilitated by the project would be required to implement mitigation measures, impacts would remain significant and unavoidable due to this irreversible loss.

5.3 Secondary Effects

According to *CEQA Guidelines* Section 15126.4(a)(1)(D), an EIR should analyze whether mitigation measures would cause one or more significant effects in addition to those that would be caused by the project as proposed. As such, this section discusses potential secondary effects from implementation of mitigation measures that would be imposed on development facilitated by the project.

Mitigation Measures AES-1 and AES-2 would not result in secondary effects on the environment, as they relate to planting of screening vegetation and requiring downcast lighting. These mitigation measures would reduce aesthetic impacts to the environment and would not create additional environmental impacts.

Mitigation Measures AQ-1 and AQ-2 are construction measures designed to reduce emissions of air pollutants and include reduction of idling times, limitations on vehicle speeds, proper vehicle maintenance, vehicle washing, and erosion control. These measures would reduce air pollution emissions and air quality nuisances and would not create additional environmental impacts.

Mitigation Measures BIO-1 through BIO-17 would reduce or avoid environmental impacts to sensitive species and habitats. They include requirements to perform biological resources screening, assessments, and plant surveys; worker education; and avoidance, restoration, and minimization measures. These measures may place restrictions on construction activities but would not result in additional environmental impacts.

Mitigation Measures CUL-1 through CUL-9 and Mitigation Measures TCR-1 through TCR-5 would prevent impacts to historic, archaeologic, and tribal cultural resources through surveys and avoidance or monitoring. They may restrict, delay, or temporarily halt construction (such as during unanticipated discovery of a resources), but they would not result in additional environmental impacts.

Mitigation Measures GEO-1 through GEO-6 are designed to protect paleontological resources during ground disturbance through consultation with a qualified paleontologist to implement worker training or paleontological monitoring and recovery and reporting if necessary. Like the biological and cultural mitigation described above, these measures have the potential to affect construction but would not result in additional environmental impacts.

Mitigation Measure GHG-1 would require individual projects on the Rezoning Sites to comply with BAAQMD GHG thresholds specific to land use projects. Compliance with existing BAAQMD GHG land use thresholds would not result in new environmental impacts.

Mitigation Measures NOI-1 through NOI-7 are noise reduction measures aimed at reducing noise from construction activities and operational noise sources, as well as ensuring exterior and interior land use noise compatibility by performing additional analysis and/or limiting hours some activities could take place. These would reduce noise levels but would not create new environmental impacts.

Mitigation Measure PH-1 requires preparation of a relocation plan. Preparation of the plan would not create environmental impacts by itself, and replacement housing could be subject to additional CEQA compliance prior to project approval.

Mitigation Measures TRA-1 and TRA-2 would involve development of transportation demand management programs and construction traffic management plans. Construction traffic management plans would generally coordinate and centralize details of construction traffic management and would not result in new environmental impacts. However, some items in the transportation demand management could result in secondary environmental effects, such as pedestrian and bus stop improvements and bicycle network enhancements. These improvements would be minor and take place in existing public rights-of-way, and therefore would result in less than significant environmental effects. Additionally, it is likely that any major project would require its own CEQA compliance process. At the time these impacts are assessed based on project-specific design information, if there is an increase in severity of impacts beyond that analyzed in this EIR, additional project-specific mitigation measures may be necessary to reduce or avoid impacts.

Mitigation Measure UTIL-1 requires a demonstration that applicable water or sewer service is available to serve future development. To demonstrate capacity, additional water or sewer pipelines or infrastructure upgrades may be necessary. These projects would require their own CEQA analysis before approval. At the time these impacts are assessed based on project-specific design information, if there is an increase in severity of impacts beyond that analyzed in this EIR, additional project-specific mitigation measures may be necessary to reduce or avoid impacts.

Mitigation Measure WFR-1 would reduce construction wildfire risk by prohibiting certain kinds of construction, ensuring fire extinguishers are on-site and that certain equipment contains spark

arresters. Mitigation Measure WFR-2 requires use of fire-resistant native vegetation. Mitigation Measure WFR-3 would restrict new structure locations to those outside landslide-susceptible areas and within 50 feet of sloped hillsides, or to incorporate structural engineering features to reduce the risk of damage to the project structures from post-fire slope instability. These measures would not result in new environmental impacts beyond those analyzed within Section 4 of this EIR.

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6 Alternatives

As required by *CEQA Guidelines* Section 15126.6, this chapter examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives but would avoid or substantially lessen the significant adverse impacts.

As discussed in Section 2, *Project Description*, the project objectives are as follows:

1. Meet the State required RHNA for 6th Cycle Housing Element planning period of 2023-2031
2. Bring the General Plan into conformance with recently enacted State law
3. Identify housing policies and programs that enable the development of additional units and the preservation of existing units, that reduce governmental constraints to building housing, and that affirmatively further fair housing across the board
4. Identify housing sites with a collective capacity to meet the County's RHNA, with buffer capacity
5. Encourage the development of higher-density housing in the County, increasing the overall availability of housing
6. Provide housing development opportunities throughout the urban areas of the Unincorporated County near jobs, transit, services, and schools
7. Implement existing goals, objectives, and policies of the Sonoma County General Plan that focus growth in established Urban Service Areas and encourage the development of infill sites to prevent sprawl and protect agricultural land and open space

This analysis presents three alternatives, including the CEQA-required "no project" alternative, that involve changes to the project that may reduce the project-related environmental impacts identified in this Program EIR. Alternatives have been developed to provide a reasonable range of options to consider that would help decision makers and the public understand the general implications of revising or eliminating certain components of the proposed project.

The following alternatives are evaluated in this EIR:

1. Alternative 1: No Project (no change in zoning of the Rezoning Sites; maximum buildout assumed based on existing zoning and land uses)
2. Alternative 2: Workforce Housing Combining District (placing the Workforce Housing Combining District on all Rezoning Sites)
3. Alternative 3: Fewer Rezoning Sites (analysis of 53 total Rezoning Sites, with 6 total removed due to greater environmental constraints)

Table 6-1 provides a summary comparison of the proposed project and each of the alternatives considered. Detailed descriptions of the alternatives are included in the impact analysis for each alternative. The potential environmental impacts of each alternative are analyzed in Sections 6.1 through 6.3.

Table 6-1 Comparison of Project Alternative Buildout Scenarios

	Proposed Project	Alternative 1: No Project	Alternative 2: Workforce Housing Combining District [1]	Alternative 3: Fewer Rezoning Sites[2]
Total Allowable Dwelling Units Under Alternative (Number of Units)	3,666	354	2,557	3,290
Change in Total Allowable Dwelling Units from Current Designation (Number of Units)	+3,312	0	+2,203	+2,936
Total Additional Residents Under Alternative (Number of Residents) [3]	9,166	920	6,281	8,186
Change in Population Potential from Current Designation (Number of Residents)	+8,246	0	+5,361	+7,266

[1] This alternative assumes two-thirds of the buildout potential of the proposed project, with the remaining potential as commercial or retail (see description in Section 6.2 below).

[2] This alternative assumes 53 Rezoning Sites (see description in Section 6.3 below). The Rezoning Sites under this alternative are included in the calculation of total allowable units and total population using the current allowable buildout density on those sites; however, no change in buildout potential would occur at the six sites removed from the analysis.

[3] Calculations based on 2.6 people per dwelling unit (California Department of Finance 2022).

6.1 Alternative 1: No Project Alternative

The *CEQA Guidelines* (Section 15126.6[e][2]) require that the alternatives discussion include an analysis of a No Project Alternative. Pursuant to CEQA, the No Project Alternative refers to the analysis of existing conditions and what would reasonably be expected to occur in the foreseeable future if the project was not approved, based on current plans and consistent with available infrastructure and community services. The No Project Alternative typically will proceed along one of two lines: (1) when a project is a revision of an existing regulatory plan or policy, the No Project Alternative will be continuation of the existing plan or policy; or (b) if a project is a development project on identifiable property, the No Project Alternative is the circumstance under which the project does not proceed. In this case, the No Project Alternative represents the continuation of existing zoning and General Plan designations on the Rezoning Sites, and full buildout under those existing designations is assumed to occur under this alternative. Typical development assumptions are included in the below analysis of this alternative, including compliance with applicable regulations or typical County-required measures.

6.1.1 Description

The No Project Alternative assumes that the project would not take place. In such a scenario, the 79 identified sites would not be incorporated into the Housing Element site inventory and there would be no change in zoning or General Plan land use designations for the parcels identified for rezoning. Current uses on the Rezoning Sites would continue under this alternative, with future full buildout of the Rezoning Sites limited by the existing zoning and General Plan designations. Buildout of the Rezoning Sites under existing zoning would allow for up to 354 total housing units, housing a population of 920 residents (refer to Table 6-1). This alternative would not accomplish the project objectives to update the General Plan's Housing Element in compliance with State-mandated housing requirements, including achieving the County's RHNA, nor would this alternative provide more housing development opportunities in urban service areas or encourage the development of

additional high-density housing. As a consequence of non-compliance with State-mandated requirements, it is reasonable to assume that some housing projects in the County may proceed through use of the "builder's remedy," other Housing Accountability Act tools, or court orders. Development based on these tools rather than a certified Housing Element may result in numerous inconsistencies with the General Plan and potentially undesirable patterns of development, such as lower than ideal housing densities in areas served by water and sewer utilities.

6.1.2 Impact Analysis

Aesthetics

Under the No Project Alternative, buildout consistent with the existing zoning and land use of the Rezoning Sites would occur. The Rezoning Sites occur in scenic vistas and viewsheds from State scenic highways as described under Impact AES-1, Impact AES-2, and Table 4.1-4. Design review would be required for future development on parcels with scenic resources zoning, but specific design review of sites identified in Mitigation Measures AES-1 through AES-4 would no longer be required, as development allowed under existing zoning would be smaller in scale than that anticipated under the proposed project. Development allowed under existing zoning would also increase lighting and glare from some of the Rezoning Sites, but fewer than under the proposed project. Similarly, compliance with County General Plan goals and policies required through the design review process and building permit applications would still be required, but Mitigation Measure AES-5 would no longer be required. Impacts would be reduced when compared to the proposed project.

Agriculture and Forestry Resources

As described in Section 4.2, *Agriculture and Forestry Resources*, none of the Rezoning Sites contain important farmland, timberland, or forest land. While the No Project Alternative would keep the existing zoning of the Rezoning Sites, development allowed under existing zoning could still result in conflicts with nearby agricultural lands, although it is anticipated that these conflicts would be less than those under the proposed project, due to the smaller scale and density of development allowed under the existing zoning. Impacts would be reduced when compared to the proposed project.

Air Quality

Under the No Project Alternative, less development would occur consistent with allowed existing zoning. Temporary construction-related air quality impacts from grading and construction and long-term air quality impacts from building operation (energy usage, maintenance), would be lower than under the proposed project. Impacts would be reduced when compared to the proposed project.

Biological Resources

The No Project Alternative would allow development under existing zoning. Because the sensitive species and habitats of the Rezoning Sites would remain, direct impacts to biological resources would be similar to those that would occur with the proposed project, but at much fewer sites as only up to 354 dwelling units would be developed. Development allowed under the No Project Alternative would be smaller in scale; however, ground disturbance would result in similar impacts to biological resources. Impacts would be similar to, and slightly reduced from the proposed project.

Cultural Resources

The No Project Alternative would allow development under existing zoning at a smaller scale than under the proposed project but could still entail ground disturbance or excavation activities. It is assumed that development under existing zoning would result in similar impacts to historic or potentially historic buildings on some of the Rezoning Sites; therefore, the No Project Alternative would not eliminate a significant and unavoidable impact to historic resources. Ground disturbance from development allowed under existing zoning would still have potential impacts to archaeological resources and human remains, although likely to a lesser extent than under the proposed project due to decreased size and scale of potential new structures. Impacts would be similar to, and slightly reduced from the proposed project.

Energy

Under the No Project Alternative, construction- and operation-related energy use from development allowed under the existing zoning of the Rezoning Sites would occur, but the decreased scale and intensity of the allowed development would be less than under the proposed project. Impacts would be reduced when compared to the proposed project.

Geology and Soils

The No Project Alternative would allow for development under existing zoning, which would involve construction or ground disturbance that could expose and loosen soils and increase the potential for erosion. The Rezoning Sites remain outside Alquist-Priolo fault zones, and future construction on any of the sites would be required to comply with California Building Code requirements, ensuring the stability of new structures during seismic events or due to expansive soils. Development allowed under existing zoning, similar to development facilitated by the proposed project, would occur in areas of high paleontological sensitivity; however, development allowed under the No Project Alternative would be smaller in scale and scope than allowed under the proposed project. Impacts would be reduced when compared to the proposed project.

Greenhouse Gas Emissions

Under the No Project Alternative, less development would occur, consistent with allowed existing zoning. Temporary construction-related greenhouse gas (GHG) emissions that result from grading and construction of new development and long-term impacts resulting from building operation (energy use, maintenance, and traffic) would be lower than under the proposed project. Impacts would be reduced when compared to the proposed project.

Hazards and Hazardous Materials

Under the No Project Alternative, the transport, storage, and use of hazardous materials associated with construction of development allowed under existing zoning, and operation of housing, commercial and industrial uses, such as paints and solvents, would be required to comply with existing regulations, similar to the proposed project. Sites containing existing contamination would continue to require remediation and compliance with State and local regulations to allow for development under existing zoning. The Rezoning Sites remain outside airport influence areas, and no impact related to airport safety hazards would occur under the No Project Alternative, as with the proposed project. Impacts would be similar to those under the proposed project.

Hydrology and Water Quality

The No Project Alternative would allow development under existing zoning, which could include construction activities that would loosen and expose soils, otherwise increase the potential for soil erosion and sedimentation, and create new or additional impervious surfaces. Due to the more limited extent of development allowed under existing zoning, these impacts would be less than those under the proposed project. Similar to the proposed project, development allowed under the No Project Alternative would not substantially decrease groundwater supplies or violate water quality standards, following compliance with applicable laws and regulations. The smaller total buildout allowed under existing zoning would have fewer impacts on hydrology and water quality than the proposed project. Impacts would be reduced when compared to the proposed project.

Land Use and Planning

Under the No Project Alternative, the Rezoning Sites would retain their existing zoning, allowing future buildout in accordance with that zoning. The No Project Alternative would not alter connectivity with adjacent areas or divide established communities. Future development under existing zoning would be required to comply with regulatory goals and policies, similar to the proposed project, as discussed in Impact LU-2. The No Project Alternative would result in less intensive future development, which would not promote high-density housing opportunities to the extent that the proposed project would. Impacts would be similar to the proposed project.

Mineral Resources

Similar to the proposed project, the No Project Alternative would allow development under existing zoning on the Rezoning Sites, which are not located on mineral resources extraction sites. No impact to mineral resources would occur. Impacts would be similar to the proposed project.

Noise

Under the No Project Alternative, less intensive impacts associated with temporary construction-related noise would result from grading and construction of development allowed under existing zoning, as less intensive development of the Rezoning Sites would be allowed. Less intensive long-term noise impacts resulting from building operation would also occur. Impacts would be reduced when compared to the proposed project.

Population and Housing

Since development would follow existing zoning, the No Project Alternative would not induce substantial population growth, as the development allowed under existing zoning is already accounted for in regional population and housing projections. As a result, the No Project Alternative would not contribute to unplanned growth and would also not displace people or housing.

The No Project Alternative would have no impacts to population and housing, while the proposed project would have less than significant impacts. Impacts under the No Project Alternative would be less than those for the proposed project. However, the No Project Alternative would not provide the benefits associated with the provision of housing that would occur under the proposed project.

Public Services and Recreation

Development allowed by existing zoning would occur under the No Project Alternative, and this alternative would result in a smaller increase to emergency calls to the area, as well as a smaller

increase in additional demand for schools, parks, libraries, recreational facilities, or other public services. Impacts under the No Project Alternative would be less than that under the proposed project.

Transportation

Under the No Project Alternative, less intensive temporary construction-related traffic impacts from grading and construction of development allowed under existing zoning would occur. The No Project Alternative would have a smaller increase in transit demand or interference with existing or planned transit facilities than the proposed project. The No Project Alternative would not alter vehicle miles traveled (VMT); similar to the proposed project, the No Project Alternative would not achieve a 15 percent reduction in VMT. Impacts would be reduced when compared to the proposed project.

Tribal Cultural Resources

The No Project Alternative would allow development under existing zoning, which could entail ground disturbance or excavation activities, but at a smaller scale than under the proposed project. However, the No Project Alternative would still have the potential to unearth and impact tribal cultural resources. Impacts would be similar to, and slightly reduced from the proposed project.

Utilities and Service Systems

Development allowed under existing zoning would occur under the No Project Alternative, and this would result in an increase in demand for water, wastewater, electricity, natural gas, telecommunications, and solid waste service. This increase in demand would be less than the proposed project due to the reduced scale of development allowed under existing zoning, compared with the proposed project; however, the expansion of water and wastewater infrastructure would still be required for sites not already adjacent to existing infrastructure. Impacts would be reduced when compared to the proposed project.

Wildfire

Under the No Project Alternative, development under existing zoning would be allowed on sites that are mapped within or near State Responsibility Areas (SRA) and fire hazard zones. Construction would require building permits and would be required to comply with applicable fire code regulations; however, as noted in Section 4.19, *Wildfire*, existing codes and regulations cannot fully prevent wildfires from damaging structures or injuring occupants. Impacts would be similar to the proposed project.

Cumulative Impacts

Based on the analysis herein, the No Project Alternative would have less impacts to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hydrology and water quality, noise, population and housing, public services and recreation, transportation, tribal cultural resources, and utilities and service systems than the proposed project. Impacts to hazards and hazardous materials, land use and planning, mineral resources, and wildfire would be similar to the proposed project. Because impacts under the No Project Alternative would be less than or similar to the proposed project, and the proposed project's contribution to cumulative impacts for most of these resource areas was determined not to be cumulatively considerable (with the exception of historic resources, VMT, and

wildfire impacts), the No Project Alternative would also not be cumulatively considerable (with the exception of historic resources, VMT, and wildfire impacts).

6.2 Alternative 2: Workforce Housing Combining District

6.2.1 Description

This alternative would involve: (1) amending the zoning code to allow for the placement of the Workforce Housing Combining District on all the Rezoning Sites, and (2) placing the Workforce Housing Combining District on all the Rezoning Sites, which would allow for both commercial development and new residences to be constructed on the Rezoning Sites. For purposes of the environmental analysis, it was assumed all 59 rezoning sites would be developed with a combination of commercial and residential uses. This assumption was used to develop an alternative that would reduce or avoid environmental impacts, particularly vehicle miles traveled, to the extent feasible. This gives the decision makers a reasonable range of alternatives as outlined in CEQA Guidelines Section 15126.6.

Buildout under this alternative would incorporate the 79 identified sites into the Housing Element site inventory but would accommodate fewer new residents. Nonetheless, this alternative would contribute to increasing housing development opportunities in unincorporated Sonoma County. It is assumed that approximately two thirds of the development proposed under the project would occur under this alternative, resulting in approximately 2,557 new dwelling units and approximately 6,281 new residents. This would result in approximately 2,203 new dwelling units and approximately 5,361 new residents more than would be developed under existing zoning. This pattern of development would allow locally serving retail uses along with residential uses at the Rezoning Sites, which would reduce the VMT for residents of those sites and surrounding areas because they would live close to some commercial uses. The commercial component of this alternative would allow for commercial uses on the ground floor with up to two stories of residential uses above. The building envelopes under this alternative would be identical to those under the proposed project, as the reduction in housing square footage would be balanced by the increase in commercial square footage. This alternative would result in an update to the County's existing Housing Element, provide housing development opportunities, and encourage the development of additional high-density housing, although to a lesser extent than the proposed project. However, this alternative would not meet project objectives because no sites would be zoned exclusively for housing.

6.2.2 Impact Analysis

Aesthetics

Under Alternative 2, buildout of the Rezoning Sites would occur, similar to the proposed project. For purposes of the analysis, it was assumed the development facilitated by Alternative 2 would be mixed use in nature, but the building envelope and height would be the same as under the proposed project. Because building sizes would be similar to the proposed project, impacts on scenic vistas, scenic resources, visual character or quality, and light and glare would be the same, and Mitigation Measures AES-1 through AES-5 would be required to reduce impacts to less than significant. Impacts would be similar to the proposed project.

Agriculture and Forestry Resources

As described in Section 4.2, *Agriculture and Forestry Resources*, none of the Rezoning Sites contain important farmland, timberland, or forest land. For purposes of the analysis it was assumed Alternative 2 would encourage mixed-use development of the Rezoning Sites, which would result in conflicts with nearby agricultural lands, similar to the proposed project. However, the Rezoning Sites would be subject to County Zoning Code agricultural protection buffers, which would ensure impacts would be less than significant. Impacts would be similar to the proposed project.

Air Quality

Under Alternative 2, a similar amount of development would occur, with approximately one third of residential square footage under the proposed project replaced with commercial uses. Temporary construction-related air quality impacts that result from grading and construction would be similar to the proposed project, as building envelopes and sizes would be approximately the same.

Alternative 2 would have a lower VMT during operation than the proposed project, as locally serving retail would be closer to new residences due to the mixed-use nature of this alternative. Therefore, Alternative 2 would result in lower operational air quality emissions than the proposed project and would have lower air quality impacts as a result. Impacts would be reduced when compared to the proposed project.

Biological Resources

Under Alternative 2, buildout of the Rezoning Sites would occur, similar to the proposed project. The development facilitated by Alternative 2 would be mixed use in nature, but the building envelope and required ground disturbance would be the same as under the proposed project. Because building sizes and ground disturbance would be similar to the proposed project, impacts on special-status species, riparian or sensitive habitats, protected wetlands, wildlife movement, conflicts with local ordinances, and conflicts with the Santa Rosa Plain Conservation Strategy would be the same, and Mitigation Measures BIO-1 through BIO-17 would be required to reduce impacts to less than significant. Impacts would be similar to the proposed project.

Cultural Resources

Under Alternative 2, buildout of the Rezoning Sites would occur, similar to the proposed project. The development facilitated by Alternative 2 would be mixed use in nature, but the building envelope and required ground disturbance would be the same as under the proposed project. Because building sizes and ground disturbance would be similar to the proposed project, impacts on historic resources, archaeological resources, and human remains would be the same, and Mitigation Measures CUL-1 through CUL-9 would be required to lessen impacts, although impacts to historic resources would remain significant and unavoidable. Impacts would be similar to the proposed project.

Energy

The development facilitated by Alternative 2 would be mixed use in nature, but the energy requirements for construction and operation would be similar to the proposed project, due to the similar building sizes and envelopes. Similar to the proposed project, development facilitated by Alternative 2 would comply with the 2019 California Building Energy Efficiency Standards for Residential Buildings and CALGreen (California Code of Regulations Title 24, Parts 6 and 11) or later

versions, which require certain energy-efficient development features. Alternative 2 would have a lower VMT than the proposed project, as locally serving retail would be close to new residences, due to the mixed-use nature of this alternative. Therefore, Alternative 2 would require less fuel for vehicle travel than the proposed project and would have lower energy demands as a result. Impacts would be reduced when compared to the proposed project.

Geology and Soils

Under Alternative 2, buildout of the Rezoning Sites would occur, similar to the proposed project. The development facilitated by Alternative 2 would be mixed use in nature, but the building envelope and required ground disturbance would be the same as under the proposed project. Because building sizes and ground disturbance would be similar to the proposed project, impacts from earthquakes, seismic-related ground failure, erosion, expansive soils, and paleontological resources would be the same, and Mitigation Measures GEO-1 through GEO-6 would be required to reduce impacts to less than significant. Impacts would be similar to the proposed project.

Greenhouse Gas Emissions

Under Alternative 2, a similar amount of development would occur as mixed-use development on the Rezoning Sites. Temporary, construction-related GHG emissions that result from grading and construction would be similar to the proposed project, as building envelopes and sizes would be approximately the same.

Alternative 2 would have a lower VMT during operation than the proposed project, as locally serving retail would be close to new residences due to the mixed-use nature of this alternative. Therefore, Alternative 2 would result in lower operational GHG emissions than the proposed project and would have lower GHG impacts as a result. Impacts would be reduced when compared to the proposed project.

Hazards and Hazardous Materials

Under Alternative 2, buildout of the Rezoning Sites would occur similar to the proposed project. The development facilitated by Alternative 2 would be mixed use in nature, but the building envelope and required ground disturbance would be the same as under the proposed project. Because building sizes and ground disturbance would be similar to the proposed project, impacts from hazardous materials transport, development on sites included on a list of sites pursuant to Government Code Section 65926.5, development near an airport, and impairment of an emergency plan would be the same. Impacts would be less than significant following compliance with applicable hazardous materials laws and regulations. Impacts would be similar to the proposed project.

Hydrology and Water Quality

Alternative 2 would allow mixed-use development on the Rezoning Sites, which would include construction activities of a similar scale as the proposed project. Alternative 2 would have a similar development footprint and intensity of development as the proposed project; therefore, impacts related to erosion, impervious surfaces, and flooding would be similar. Similar to the proposed project, development allowed under Alternative 2 would not substantially decrease groundwater supplies or violate water quality standards, following compliance with applicable laws and regulations. Impacts would be similar to the proposed project.

Land Use and Planning

Alternative 2 would facilitate mixed-use development on the Rezoning Sites. Similar to the proposed project, Alternative 2 would not alter connectivity with adjacent areas or divide established communities, as it would encourage infill development within designated urban service areas. Alternative 2 would reduce VMT associated with the project by locating locally serving retail with residential developments; therefore, this alternative would result in lower transportation costs than the proposed project in relation to Plan Bay Area 2040. Alternative 2 would be consistent with the General Plan goals and policies included in Section 4.11, *Land Use and Planning*, similar to the proposed project, as similar utilities upgrades would be required. This alternative would also result in the future development of infill sites, and the intensity of development would be similar to the proposed project. Alternative 2 would introduce additional commercial uses to the urban service areas, which better aligns with Policy LU-6i than the proposed project. However, this alternative would introduce both commercial and residential uses to some existing commercial-only and residential-only areas, which would slightly alter the land use character of the area. This alternative would reduce housing opportunities compared to the proposed project, which would result in a lesser increase in high-density housing per goals and policies in the General Plan Housing Element. Overall, impacts would be lesser than the proposed project.

Mineral Resources

Similar to the proposed project, Alternative 2 would allow for the development of mixed uses on the Rezoning Sites, which are not located on mineral resources extraction sites. No impact to mineral resources would occur. Impacts would be similar to the proposed project.

Noise

Under Alternative 2, the amount of construction required would be comparable to the proposed project, resulting in similar temporary construction-related noise and vibration impacts. Long-term noise impacts resulting from building operation would be similar to the proposed project, if slightly reduced due to the fewer vehicle trips that would be associated with this alternative. Impacts would be similar to and slightly less than the proposed project.

Population and Housing

Development facilitated by Alternative 2 would result in approximately 2,220 new dwelling units and approximately 5,770 new residents, or approximately 1,846 dwelling units and 4,850 residents above allowable development under existing General Plan designations. However, this increase would not induce substantial population growth, as the County has been assigned a substantial increase in its approved draft RHNA allocation of more than 3,900 units (ABAG 2021). As a result, Alternative 2 would not contribute to unplanned growth; neither would it displace people or housing. However, Alternative 2 would not provide as much housing as the proposed project and would address the County's replacement housing and high-density housing need to a lesser extent than the proposed project. Impacts under Alternative 2 would be similar to the proposed project.

Public Services and Recreation

Development facilitated by Alternative 2 would increase the demand for fire protection, police protection, schools, parks, recreational facilities, and other public facilities. This alternative would introduce less housing than the proposed project, which would result in lesser demands for schools, parks, and recreational facilities. The reduction in housing would be supplemented by an increase in

locally serving commercial uses, which would result in an overall similar increase in demand for fire and police protection services. Impacts under Alternative 2 would be lesser than the proposed project.

Transportation

Under Alternative 2, similar temporary construction-related traffic impacts would occur. The addition of commercial uses would result in a more efficient travel pattern, especially in areas that lack locally serving retail. This would result in a lower increase in VMT as compared to the proposed project; however, travel to schools, employment, recreation, and other destinations would remain the same as the proposed project. Alternative 2 would have a smaller increase in transit demand than the proposed project, as a smaller increase in new residents would occur. Impacts would be reduced when compared to the proposed project. While VMT would be reduced by Alternative 2 compared to the proposed project, a significant and unavoidable VMT impact would still occur (Appendix TRA).

Tribal Cultural Resources

Under Alternative 2, buildout of the Rezoning Sites would occur similar to the proposed project. The development facilitated by Alternative 2 would be mixed use in nature, but the building envelope and required ground disturbance would be the same as under the proposed project. Because building sizes and ground disturbance would be similar to the proposed project, impacts on tribal cultural resources would be the same, and Mitigation Measures TCR-1 through TCR-5 would be required to lessen impacts. Impacts would be similar to the proposed project.

Utilities and Service Systems

Development facilitated by Alternative 2 would result in an increase in demand for water, wastewater, electricity, natural gas, telecommunications, and solid waste service. This increase in demand would be similar to the proposed project despite the reduction in residential uses, as commercial uses would be developed alongside the residential uses. As with the proposed project, water and wastewater infrastructure upgrades would be required for sites not already adjacent to existing infrastructure. The required upgrades would be similar under this alternative as under the proposed project. Impacts would be similar to the proposed project.

Wildfire

Alternative 2 would facilitate the development of mixed-use buildings on sites that are mapped within or near SRAs and fire hazard zones. Construction would require building permits and would be required to comply with applicable fire code regulations; however, as noted in Section 4.19, *Wildfire*, existing codes and regulations cannot fully prevent wildfires from damaging structures or injuring occupants. Mitigation Measures WFR-1, WFR-2, and WFR-3 would still be required under this alternative for development on Rezoning Sites. Similar to the proposed project, impacts would remain significant and unavoidable. Impacts would be similar to the proposed project.

Cumulative Impacts

Based on the analysis herein, Alternative 2 would have lesser impacts to air quality, energy, GHG emissions, land use and planning, noise, public services and recreation, and transportation than the proposed project. Impacts to aesthetics, agriculture and forestry resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality,

mineral resources, population and housing, tribal cultural resources, utilities and service systems, and wildfire would be similar to the proposed project. Because impacts under Alternative 2 would be lesser or similar to the proposed project, and the proposed project's contribution to cumulative impacts for most of these resource areas was determined not to be cumulatively considerable (with the exception of historic resources, VMT, and wildfire impacts), Alternative 2 would also not be cumulatively considerable (with the exception of historic resources, VMT, and wildfire impacts).

6.3 Alternative 3: Fewer Rezoning Sites

6.3.1 Description

This alternative analyzes the impacts of adding fewer Rezoning Sites to the County's inventory of sites zoned for by-right housing development. Those sites with the most environmental constraints that would make developing sites more difficult, have greater environmental impacts, or would be more costly to develop have been removed from Alternative 3. These Rezoning Sites are described below.

1. FOR-1
2. FOR-2
3. SON-1
4. SON-2
5. SON-3
6. SON-4

These six Rezoning Sites have greater than average environmental constraints compared to the other Rezoning Sites. In particular, these sites would require off-site infrastructure water and sewer improvements to serve future development. Under this alternative, the remaining 53 Rezoning Sites would be rezoned for future development, identical to the proposed project. Development facilitated by Alternative 3 would result in approximately 2,898 new dwelling units and approximately 7,535new residents. This would add approximately 2,599 new dwelling units and approximately 6,795 new residents more than development that occurs under existing zoning.

6.3.2 Impact Analysis

Aesthetics

Under Alternative 3, buildout of 53 Rezoning Sites would occur, similar to the proposed project. The development facilitated by Alternative 3 on those sites would be the same as under the proposed project. Because building sizes would be the same as the proposed project, impacts on scenic vistas, scenic resources, visual character or quality, and light and glare would be the same, and Mitigation Measures AES-1 through AES-5 would be required to reduce impacts to less than significant. Impacts would be similar to the proposed project, except on fewer sites.

Agriculture and Forestry Resources

As described in Section 4.2, *Agriculture and Forestry Resources*, none of the Rezoning Sites contain important farmland, timberland, or forest land. Alternative 3 would allow development of the 53 Rezoning Sites, which would result in conflicts with nearby agricultural lands, similar to the proposed project. However, the Rezoning Sites would be subject to County Zoning Code agricultural

protection buffers, which would ensure impacts would be less than significant. Impacts would be similar to the proposed project, except on fewer sites.

Air Quality

Under Alternative 3, the same amount of development would occur on the 53 Rezoning Sites as the proposed project. Temporary construction-related air quality impacts that result from grading and construction would be similar to the proposed project, except on fewer sites.

Alternative 3 would have a similar VMT during operation than the proposed project on the 53 Rezoning Sites. Overall, Alternative 3 would result in slightly lower operational air quality emissions than the proposed project and would have slightly smaller air quality impact as a result. Impacts would be slightly reduced when compared to the proposed project.

Biological Resources

Under Alternative 3, buildout of the 53 Rezoning Sites would occur, similar to the proposed project. The development facilitated by Alternative 3 would result in the same ground disturbance as under the proposed project for the 53 Rezoning Sites. Because building sizes and ground disturbance would be similar to the proposed project, impacts on special-status species, riparian or sensitive habitats, protected wetlands, wildlife movement, conflicts with local ordinances, and conflicts with the Santa Rosa Plain Conservation Strategy would be the same, and Mitigation Measures BIO-1 through BIO-17 would be required to reduce impacts to less than significant. Impacts would be similar to the proposed project, except on fewer sites.

Cultural Resources

Under Alternative 3, buildout of the 53 Rezoning Sites would occur, similar to the proposed project. The development facilitated by Alternative 3 would result in the same ground disturbance as under the proposed project on the 53 Rezoning Sites. Because building sizes and ground disturbance would be similar to the proposed project, impacts on historic resources, archaeological resources, and human remains would be the same, and Mitigation Measures CUL-1 through CUL-9 would be required to reduce impacts, although impacts to historic resources would remain significant and unavoidable. Impacts would be similar to the proposed project, except on fewer sites.

Energy

Under Alternative 3, buildout of the 53 Rezoning Sites would occur, similar to the proposed project. Similar to the proposed project, development facilitated by Alternative 3 would comply with the 2019 California Building Energy Efficiency Standards for Residential Buildings and CALGreen (California Code of Regulations Title 24, Parts 6 and 11) or later versions, which require certain energy efficient development features. Alternative 3 would require less fuel for vehicle travel than the proposed project with the development of only 53 Rezoning Sites and would have lower energy demands as a result. Impacts would be reduced when compared to the proposed project.

Geology and Soils

Under Alternative 3, buildout of 53 Rezoning Sites would occur, similar to the proposed project. The development facilitated by Alternative 3 would result in the same ground disturbance as under the proposed project. Because building sizes and ground disturbance would be the same as the proposed project for the 53 Rezoning Sites, impacts from earthquakes, seismic-related ground failure, erosion, expansive soils, and paleontological resources would be the same, and Mitigation

Measures GEO-1 through GEO-6 would be required to reduce impacts to less than significant. Impacts would be similar to the proposed project, except on fewer sites.

Greenhouse Gas Emissions

Under Alternative 3, the amount of development would occur on the 53 Rezoning Sites. Temporary construction-related GHG emissions that result from grading and construction would be similar to the proposed project, except on fewer sites.

Alternative 3 would have a similar VMT during operation than the proposed project. Overall, Alternative 3 would result in slightly lower operational GHG emissions than the proposed project and would have slightly smaller GHG impact as a result. Impacts would be slightly reduced when compared to the proposed project.

Hazards and Hazardous Materials

Under Alternative 3, buildout of the 53 Rezoning Sites would occur, similar to the proposed project. The development facilitated by Alternative 3 would result in the same ground disturbance as under the proposed project. Because building sizes and ground disturbance would be similar to the proposed project, impacts from hazardous materials transport, development on sites included on a list of sites pursuant to Government Code Section 65926.5, development near an airport, and impairment of an emergency plan would be the same, and impacts would be less than significant following compliance with applicable hazardous materials laws and regulations. Impacts would be similar to the proposed project.

Hydrology and Water Quality

Alternative 3 would allow future residential development on the 53 Rezoning Sites, which would include construction activities of a similar scale as the proposed project. Therefore, impacts related to erosion, impervious surfaces, and flooding, would be the same as the proposed project for the 53 Rezoning Sites. Similar to the proposed project, development allowed under Alternative 3 would not substantially decrease groundwater supplies or violate water quality standards, following compliance with applicable laws and regulations. Impacts would be similar to the proposed project, except on fewer sites.

Land Use and Planning

Alternative 3 would facilitate residential development on the 53 Rezoning Sites. Similar to the proposed project, Alternative 3 would not alter connectivity with adjacent areas or divide established communities, as it would encourage infill development within designated urban service areas. Alternative 3 would lower VMT associated with the project by removing six of the Rezoning Sites from the proposed rezoning; therefore, this alternative would result in slightly lower transportation costs than the proposed project. Alternative 3 would be consistent with the General Plan goals and policies included in Section 4.11, *Land Use and Planning*, similar to the proposed project, as fewer utilities upgrades would be required. This alternative would also result in the future development of infill sites, and the intensity of development would be similar to the proposed project for the 53 Rezoning Sites. This alternative would reduce housing opportunities compared to the proposed project, due to the reduction in the number of total sites, which would result in a smaller increase in high-density housing per goals and policies in the General Plan Housing Element. Impacts would be similar to than the proposed project.

Mineral Resources

Similar to the proposed project, Alternative 3 would allow for the development of residential uses on the 53 Rezoning Sites, which are not located on mineral resources extraction sites. No impact to mineral resources would occur. Impacts would be similar to the proposed project.

Noise

Under Alternative 3, the amount of construction required would be the same as the proposed project for the 53 Rezoning Sites, resulting in similar temporary construction-related noise and vibration impacts. Long-term noise impacts resulting from building operation would be the same as the proposed project for the 53 Rezoning Sites. Alternative 3 would result in lesser noise impacts at the six removed sites. Impacts would be similar to the proposed project, except on fewer sites.

Population and Housing

Development facilitated by Alternative 3 would result in approximately 2,953 new dwelling units and approximately 7,675 new residents, or approximately 2,599 new dwelling units and approximately 6,759 new residents more than allowed under existing General Plan designations at the 53 Rezoning Sites. However, this increase would not induce substantial unplanned population growth, as the County has been assigned a substantial increase in its approved draft RHNA allocation of more than 3,900 units (ABAG 2021). As a result, Alternative 3 would not contribute to unplanned growth and would also not displace people or housing. However, Alternative 3 would provide 431 fewer units compared to the proposed project (and an overall increase from existing zoning of 376 units) and would address the County's replacement housing and high-density housing need to a lesser extent than the proposed project. Impacts under Alternative 3 would be similar to the proposed project.

Public Services and Recreation

Development facilitated by Alternative 3 would increase the demand for fire protection, police protection, schools, parks, recreational facilities, and other public facilities. This alternative would introduce less housing than the proposed project, which would result in lesser demands for schools, parks, and recreational facilities in the vicinity of the Forestville and Sonoma sites. Impacts under Alternative 3 would be lesser than the proposed project.

Transportation

Alternative 3 would result in the same temporary construction-related traffic impacts at the 53 Rezoning Sites. Alternative 3 would result in the same VMT at the 53 Rezoning Sites. Similarly, Alternative 3 would have a similar increase in transit demand at the 53 Rezoning Sites as the proposed project. Impacts would be similar to the proposed project, except on fewer sites.

Tribal Cultural Resources

Under Alternative 3, buildout of the 53 Rezoning Sites would occur, similar to the proposed project. The ground disturbance resulting from development facilitated by Alternative 3 would be the same as under the proposed project for the 53 Rezoning Sites. Therefore, impacts on tribal cultural resources would be the same on these sites, and Mitigation Measures TCR-1 through TCR-5 would be required to reduce impacts. Impacts would be similar to the proposed project, except on fewer sites.

Utilities and Service Systems

Development facilitated by Alternative 3 would result in an increase in demand for water, wastewater, electricity, natural gas, telecommunications, and solid waste service at the 53 Rezoning Sites. This increase in demand would be the same as the proposed project for the 53 Rezoning Sites; however, fewer sites would require water and sewer infrastructure improvements and extensions with the removal of the six sites. Impacts would be similar to the proposed project, except on fewer sites.

Wildfire

Alternative 3 would facilitate the development of residential uses on the 53 Rezoning Sites, which are mapped within or near SRAs and fire hazard zones. Sites GUE-1 through GUE-4, GLE-1, GLE-2, PEN-2, PEN-4, and PEN-7 are in Moderate Fire Hazard Severity Zones, with sites GEY-1 through GEY-4, FOR-1 through FOR-6, GLE-1, GLE-2, and AGU-1 through AGU-3 near (within 2 miles of) a Very High Fire Hazard Severity Zone and all sites within or near (within 2 miles of) a SRA. Construction would require building permits and would be required to comply with applicable fire code regulations; however, as noted in Section 4.19, *Wildfire*, existing codes and regulations cannot fully prevent wildfires from damaging structures or injuring occupants. Mitigation Measures WFR-1, WFR-2, and WFR-3 would still be required under this alternative for development on the 53 Rezoning Sites. Similar to the proposed project, impacts would remain significant and unavoidable. Impacts would be similar to the proposed project.

Cumulative Impacts

Based on the analysis herein, Alternative 3 would have fewer impacts to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hydrology and water quality, noise, public services and recreation, transportation, tribal cultural resources, and utilities and service systems than the proposed project. Impacts to hazards and hazardous materials, land use and planning, mineral resources, population and housing, and wildfire would be similar to the proposed project. Because impacts under Alternative 3 would be lesser or similar to the proposed project, and the proposed project's contribution to cumulative impacts for most of these resource areas was determined not to be cumulatively considerable (with the exception of historic resources, VMT, and wildfire impacts), Alternative 2 would also not be cumulatively considerable (with the exception of historic resources, VMT, and wildfire impacts).

6.4 Alternatives Considered but Rejected

The County considered numerous alternatives based on public engagement and staff input. The following summarizes those alternatives considered, but ultimately rejected for inclusion in this Program EIR analysis, as they would not meet most of the project objectives, did not substantially reduce impacts compared to the proposed project, or were determined to be infeasible.

1. The County looked at an alternative that would reduce vacation rental use and convert vacation rentals back to "regular" residential rental housing countywide. This alternative would not encourage the development of new residences for Sonoma's workforce, and therefore would not meet most of the project objectives, particularly to increase the overall availability of housing as well as providing housing opportunities throughout the urban areas of the Unincorporated County near jobs, transit, services, and schools. Additionally, there is no guarantee that former vacation rental housing would be converted into full-time residential use

rather than being retained by owner-occupants, and it is speculative to assume that all former vacation rentals would become housing units for new residents. Vacation rentals are already prohibited within the medium and high-density residential zones where most of the Rezoning Sites are located. The County has several policies restricting vacation rental use, including Sonoma County Code Section 26-88-120, which is intended to ensure vacation rentals are compatible with and do not adversely impact surrounding residential and agricultural uses and limits the maximum number of guestrooms, overnight occupancy, guests and daytime visitors, and residences or structures per parcel. County Code Section 26-88-120 also contains provisions regarding parking and performance standards for noise limits, pets, trash/recycling facilities, outdoor fire areas, utilities connections, and emergency access. County Code Section 26-75-050 prohibits vacation rentals or other transient occupancies in workforce housing in WH combining districts. County Code Section 26-24-030 prohibits vacation rentals in the R1, R2, and R3 zoning districts. In zones where vacation rentals are allowed, County Code Section 26-28-160 allows vacation rentals only in single-family residences. County Code Chapter 26, Article 79 establishes the Vacation Rental Exclusion Combining District, which prohibits vacation rentals in designated areas that lack adequate road access of off-street parking, residential character is preferred, where the residential housing stock is to be protected from conversion to visitor-serving uses, where there is a significant fire hazard, or other areas as determined by the Board of Supervisors. Due to the extent of existing County regulations restricting vacation rentals in certain areas and in certain residential zones, this alternative would not be substantially different from existing conditions in the County and would not achieve project objectives.

2. The County considered an alternative that would require deed-restricted, legally affordable housing on all the Rezoning Sites. Although this alternative could meet most of the project objectives, it would not reduce or avoid an environmental impact under CEQA. Additionally, to receive the maximum density bonus and other incentives for affordable housing development, a project is already required to be deed restricted as to affordability. Additionally, it might not meet the project objectives 1 and 4 because the Department of Housing and Community Development might view such a requirement as an unacceptable constraint on housing development and deem any sites that were subject to this restriction as not eligible for inclusion in the County's sites inventory.
3. The County considered an alternative to encourage development within existing infill sites in unincorporated communities and Urban Service Areas with existing sewer and water that are not inside cities' Spheres of Influence and/or voter approved-Urban Growth Boundaries (UGBs). Proper location is an important consideration for new housing in the Unincorporated County, as there has been a long-standing countywide commitment to avoid sprawl and protect open space. General Plan Goal LU-3; Objectives LU-2.5 and LU-5.1; and Policies LU-2c, LU-3b, LU-3c, LU-5e, and LU-20a protect designated Community Separators and facilitate city- and community-centered growth, voter-approved UGBs, and General Plan-designated Urban Service Areas. Developing outside of UGBs in particular would disrupt the existing land use patterns in UGBs and introduce incompatible uses. The 59 Rezoning Sites were carefully selected after a preliminary evaluation of over 100 sites to determine the most appropriate sites to move forward for comprehensive evaluation (see Section 2.4.3, *Project Background*, for full description of the site selection process). Therefore, this alternative would substantially reduce the number of sites to analyze because few vacant infill sites meet all of these requirements, which would further reduce the County's ability to encourage increased residential development.

4. The County considered a lower density alternative, but this would not achieve project objectives because lower densities would not meet the County's 6th cycle RHNA requirements due to the limitations of finding additional sites that could support residential uses. Therefore, this alternative was rejected. Additionally, Alternatives 2 and 3 already consider lower levels of housing development across the Rezoning Sites.
5. The County considered an alternative where development "by right" is not an integral project component. By-right means that no discretionary land use approvals would be required for the development of medium-density housing on the Rezoning Sites. This alternative was eliminated because it would not reduce or avoid an environmental impact, as the same level of future buildout would be anticipated as under the proposed project.

6.5 Environmentally Superior Alternative

CEQA requires identification of the environmentally superior alternative among all alternatives considered for the proposed project. The environmentally superior alternative must be an alternative that reduces some of the project's environmental impacts, regardless of the financial costs associated. Identification of the environmentally superior alternative is an informational procedure and the alternative identified as the environmentally superior alternative may not be that which best meets the goals or needs of the proposed project. Table 6-2 indicates whether each alternative's environmental impact is greater than, less than, or similar to that of the proposed project for each of the issue areas studied. Based on the alternatives analysis provided above, Alternative 3 would be the environmentally superior alternative.

Based on the analysis of alternatives in this section, the No Project Alternative is the environmentally superior alternative as it would either avoid or lessen the severity of most impacts of the proposed project, even though some housing projects in the County may proceed through use of the builder's remedy, other Housing Accountability Act tools, or court orders under this alternative. The No Project Alternative would still result in significant and unavoidable transportation, cultural resources, and wildfire impacts. Because the No Project Alternative would not generate new population within the County above existing buildout projections, impacts to public services and recreation, and utilities and service systems would be eliminated. In addition, significant but mitigable impacts related to aesthetics, air quality, biological resources, geology and soils, noise, tribal cultural resources, and utilities and service systems would be reduced compared to the project. However, this alternative would not meet the project objectives, as it would not update the County's General Plan Housing Element or increase the opportunities for housing development in the County.

If the No Project Alternative is determined to avoid or reduce more impacts than any other alternative, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives (*CEQA Guidelines* Section 15126.6[e]). Of the other alternatives evaluated in this EIR, Alternative 3 (Fewer Rezoning Sites) would be environmentally superior. Because this alternative would generate fewer residents within the County, impacts to public services and recreation, and utilities and service systems would also be reduced. In addition, this alternative would not rezone the six of the more environmentally-constrained Rezoning Sites, which would reduce significant but mitigable impacts to related to aesthetics, air quality, biological resources, geology and soils, noise, tribal cultural resources, and utilities and service systems. However, the significant and unavoidable impacts to cultural resources, transportation, and wildfire would remain significant and unavoidable under Alternative 3. Furthermore, this alternative would achieve the

project objectives to a lesser extent than the proposed project, as it would rezone fewer sites for increased housing development opportunities.

Table 6-2 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: No Project	Alternative 2: Workforce Housing Combining District	Alternative 3: Fewer Rezoning Sites
Aesthetics	SU	+	=	+
Agriculture and Forestry Resources	LTSM	+	=	+
Air Quality	LTSM	+	+	+
Biological Resources	LTSM	=/+	=	+
Cultural Resources	SU	=/+	=	+
Energy	LTS	+	+	+
Geology and Soils	LTSM	+	=	+
Greenhouse Gas Emissions	LTS	+	+	+
Hazards and Hazardous Materials	LTS	=	=	=
Hydrology and Water Quality	LTS	+	=	+
Land Use and Planning	LTS	=	+	=
Mineral Resources	NI	=	=	=
Noise	LTSM	+	=/+	+
Population and Housing	LTS	+	=	=
Public Services and Recreation	LTS	+	+	+
Transportation	SU	+	+	+
Tribal Cultural Resources	LTSM	=/+	=	+
Utilities and Service Systems	LTSM	+	=	+
Wildfire	SU	=	=	=

NI = No Impact; LTS = Less than Significant; LTSM = Less than Significant with Mitigation; SU = Significant and Unavoidable

\+ Superior to the proposed project (reduced level of impact)

\- Inferior to the proposed project (increased level of impact)

= Similar level of impact to the proposed project

Alternative 2 (Workforce Housing Combining District) would generally result in similar or decreased environmental impacts compared to the proposed project. By allowing for commercial land uses alongside residential uses, this alternative would reduce VMT, reducing impacts to air quality, energy, GHG emissions, land use and planning, noise, and transportation. However, the VMT reduction achieved by Alternative 2 would not avoid the significant VMT impacts of the proposed project. This alternative would also result in reduced impacts to public services and recreation. However, this alternative might not be approved by the California Housing and Community Development Department because the County needs to show sites that are 100 percent residential in its sites inventory.

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Mitigation Monitoring and Reporting Program

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Final Environmental Impact Report (Final EIR), specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

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Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Aesthetics							
AES-1: Screening Vegetation							
Project landscape plans shall be designed with screening vegetation. Project landscape plans shall be approved by the County prior to building permit approval.	Project landscape plans with screening vegetation shall be approved by the County.	Prior to building permit approval.	Once	Permit Sonoma, Planning Division			
AES-2: Exterior Lighting Requirements							
Project designs shall incorporate exterior lighting plans meeting the following minimum requirements: 1. Lighting shall be mounted low, downward casting, and fully shielded to prevent glare. 2. Lighting shall not wash out structures or any portions of the site. 3. Light fixtures shall not be located at the periphery of the property and shall not spill over onto adjacent properties or into the sky. 4. Flood lights are not permitted. 5. Parking lot fixtures shall be limited to 20 feet in height. 6. All parking lot and/or streetlight fixtures shall use full cut-off fixtures 7. Lighting shall shut off automatically after businesses close and security lighting shall be motion-sensor activated. 8. Lighting plans shall be designed to meet the appropriate Lighting Zone standards from Title 24 effective October 2005 (LZ1 for dark areas, LZ2 for rural, LZ3 for urban) or successor regulations.	The County shall verify that the exterior lighting requirements are met for each development project facilitated by the proposed housing element update.	Prior to building permit approval	Once	Permit Sonoma, Planning Division			
Agriculture and Forestry Resources							
AG-1: Interim Agricultural Buffers							
Development facilitated by the project on the Rezoning Sites adjacent to active agricultural operations shall provide fencing and a minimum buffer of 200 feet to the agricultural operations, consistent with 26-88-040(f) of the Sonoma County Zoning Code. If this distance is not practical due to project design or features, a minimum 100-foot buffer is acceptable if it complies with all of the requirements for a reduced buffer and a vegetative screen is provided as specified in Section 26-88-040(f).	The county shall verify that development facilitated by the project adjacent to active agricultural operations incorporates a 200-foot (minimum 100-foot) buffer between the development and adjacent agriculture.	Prior to building permit approval	Once	Permit Sonoma, Planning Division			
Air Quality							
AQ-1: Basic Construction Mitigation Measures							
All development facilitated by the project on the Rezoning Sites (regardless of whether the development is under the jurisdiction of the NSCAPCD or the BAAQMD) shall be required to reduce construction emissions of reactive organic gases, nitrogen oxides, and particulate matter (PM10 and PM2.5) by implementing the BAAQMD's Basic Construction Mitigation Measures (described below) or equivalent, expanded, or modified measures based on project and site-specific conditions. 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day, with priority given to the use of recycled water for this activity. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping shall be prohibited. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. 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. 6. 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. 7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator. 8. A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.	The County shall verify that development facilitated by the project implements BAAQMD's Basic Construction Mitigation Measures.	Prior to issuance of construction permits	Ongoing throughout construction activities	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
AQ-2: Additional Construction Mitigation Measures							
In addition to implementation of Mitigation Measure AQ-1, for any project on the Rezoning Sites (regardless of whether the development is under the jurisdiction of the NSCAPCD or the BAAQMD) that meets the following conditions and as listed in Table 4.3-6, the County shall condition development facilitated by the project to implement BAAQMD CEQA Air Quality Guidelines' Additional Construction Mitigation Measures: 1. Exceed the BAAQMD construction screening threshold of a change in allowable dwelling units of 114 dwelling units for single-family residences or 240 dwelling units for multi-family residences 2. Would result in a change in allowable dwelling units of more than 38 units 3. Would require demolition or simultaneous occurrence of more than two construction phases 4. Simultaneous construction of more than one land use type (e.g., a mixed-use project involving commercial and residential) 5. Extensive material transport of more than 10,000 cubic yards In addition to implementation of Mitigation Measure AQ-1 for any Rezoning Sites that meet the criteria listed above, the following measures (or equivalent, expanded, or modified measures based on project- and site-specific conditions) shall be implemented throughout construction of the project: 1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe. 2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. 3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks shall have at maximum 50 percent air porosity. 4. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. 5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. 6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site. 7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12-inch compacted layer of wood chips, mulch, or gravel. 8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent. 9. Minimizing the idling time of diesel powered construction equipment to two minutes. 10. The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NOX reduction and 45 percent PM reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available. 11. Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings). 12. Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM. 13. Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines.	The County shall condition development facilitated by the project to implement BAAQMD CEQA Air Quality Guidelines' Additional Construction Mitigation Measures.	Prior to issuance of construction permits	Once	Permit Sonoma, Building Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Biological Resources							
BIO-1: Biological Resources Screening and Assessment.							
For projects on the Rezoning Sites in the BSAs that would require ground disturbance through clearing/grading or vegetation trimming, the project applicant shall engage a qualified biologist (having the appropriate education and experience level) to perform a preliminary Biological Resources Screening and Assessment to determine whether the project has any potential to impact special status biological resources, inclusive of special status plants and animals, sensitive vegetation communities, jurisdictional waters (including creeks, drainages, streams, ponds, vernal pools, riparian areas and other wetlands), critical habitat, wildlife movement area, or biological resources protected under local or regional (City or County) ordinances or an existing Habitat Conservation Plan (HCP) or Natural Community Conservation Plan, including the Santa Rosa Plain Conservation Strategy. If it is determined that the project has no potential to impact biological resources, no further action is required. If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 500 feet around the project footprint, and to determine the potential impacts to those resources. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, state, and/or federal agencies. If the project would have the potential to impact these resources, the following mitigation measures (Mitigation Measures BIO-2 through BIO-12) shall be incorporated, as applicable, to reduce impacts to a less than significant. Pending the results of the project-specific biological analysis, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, NMFS, CDFW, and/or other local, state, and federal agencies may be required. Note that specific surveys described in the mitigation measures below may be completed as part of the project-specific biological analysis where suitable habitat is present.	The County shall verify that a qualified biologist performs preliminary Biological Resources Screening and Assessment for projects in the BSAs that would require ground disturbance through clearing/grading or vegetation trimming. If this preliminary screening indicates that the project would have the potential to impact biological resources, the County shall verify that a qualified biologist conducted a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 500 feet around the project footprint, and to determine the potential impacts to those resources.	Prior to grading, clearing, or vegetation trimming	Once	Permit Sonoma, Planning Division			
BIO-2: Special Status Plant Species Surveys							
If the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) determines that there is potential for impacts to federally or state-listed plants or species with a CRPR of 1B or 2B from project development, a qualified biologist shall complete surveys for special status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). Surveys shall be conducted following CDFW's 2018 Protocol for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants) and, as applicable, the Santa Rosa Plain Conservation Strategy Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain, including, but not limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts, such as altering off-site hydrological conditions where these species may be present, or any formal updates of these protocols. The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species identified in the project-specific biological analysis. All plant surveys shall be conducted by a qualified biologist during the blooming season prior to initial ground disturbance. More than one year of surveys may be required to establish that plants are absent, and the above Santa Rosa Plain Conservation Strategy Appendix D requires a minimum of two years of surveys, which shall be implemented unless otherwise approved in writing by CDFW. All special status plant species identified on site shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the County, and the CDFW and/or USFWS, as appropriate, for review and/or approval. The project shall obtain written approval of the survey reports from CDFW prior to the start of construction, unless otherwise approved in writing by CDFW. If any special-status plants are observed, the Project shall: 1) avoid all direct and indirect impacts to the special-status plants, and 2) prepare and implement an avoidance plan that is approved in writing by CDFW prior to Project start. If CESA listed plants are observed and impacts cannot be avoided, the Project shall obtain a CESA ITP from CDFW. For impacts to federal Endangered Species Act (ESA) listed plants, the Project shall obtain authorization from USFWS.	The County shall verify that a qualified biologist conducted complete surveys for special status plants prior to any vegetation removal, grubbing, or other construction activity for any projects which result in potential for impacts to federally or state-listed plants or species according to the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1).	Prior to vegetation removal	Once	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
BIO-3: Special Status Plant Species Avoidance, Minimization, and Mitigation							
If federally and/or state-listed or CRPR 1B or 2 species are found during special status plant surveys (pursuant to Mitigation Measure BIO-2), and would be directly impacted, or there would be a population-level impact to non-listed sensitive species, then the project shall be re-designed to avoid impacting those plant species. Rare and listed plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm. For projects on Rezoning Sites in BSAs located within the Santa Rosa Plain Area, protocol rare plant surveys shall be conducted, and impacts to suitable rare plant habitat mitigated, in accordance with the 2007 USFWS Santa Rosa Plain Programmatic Biological Opinion, as amended in 2020.	The County shall verify that the project is designed to avoid impacting special status plant surveys, that protective fencing is in place to protect rare and listed plants located within 50 feet of disturbance limits, and that projects in the BSAs located within the Santa Rosa Plain Area have protocol rare plant surveys conducted on site.	Prior to construction	Once	Permit Sonoma, Planning Division			
BIO-4: Restoration and Monitoring, and Habitat Compensation							
Development and/or restoration activities shall be conducted in accordance with a site-specific Habitat Restoration Plan. If federally or state-listed plants or non-listed special status CRPR 1B and 2 plant populations cannot be avoided, and will be impacted by development, all impacts shall be mitigated by the applicant at a ratio not lower than 1:1 and to be determined by the County (in coordination with CDFW and USFWS as applicable) for each species as a component of habitat restoration, unless otherwise approved in writing by CDFW. For impacts to state-listed plants, habitat compensation at a minimum 1:1 mitigation to impact ratio shall be provided, which may include either the purchase of credits at a CDFW-approved mitigation or conservation bank or purchasing appropriate habitat and conserving it in perpetuity through a conservation easement and management plan, which shall be prepared, funded, and implemented by the Project in perpetuity, unless otherwise approved in writing by CDFW. A qualified biologist shall prepare and submit a restoration plan to the County and CDFW for review and approval. (Note: if a federally and/or state-listed plant species will be impacted, the restoration plan shall be submitted to the USFWS and/or CDFW for review, and federal and/or state take authorization will be obtained from these agencies.) The restoration plan shall include, at a minimum, the following components: 1. Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type) 2. Goal(s) of the compensatory mitigation project (type[s] and area[s]) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type[s] to be established, restored, enhanced, and/or preserved) 3. Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions, and values) 4. Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan) 5. Maintenance activities during the monitoring period, including weed removal as appropriate (activities, responsible parties, schedule) 6. Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports) 7. Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of container plants and 30 percent relative cover by vegetation type or other industry standards as determined by a qualified restoration specialist 8. An adaptive management program and remedial measures to address any shortcomings in meeting success criteria 9. Notification of completion of compensatory mitigation and agency confirmation 10. Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism)	The County shall review and approve a restoration plan prepared by a qualified biologist if federally or state-listed plants or non-listed special status CRPR 1B and 2 plant populations cannot be avoided, and will be impacted by development. The County shall verify that all impacts are mitigated by the applicant at a ratio not lower than 1:1.	Prior to construction	Once	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
BIO-5: Endangered/Threatened Species Habitat Assessments and Protocol Surveys, CDFW and USFWS Authorization and Habitat Compensation							
Specific habitat assessments and survey protocols are established for several federally and state-listed endangered or threatened species. If the results of the project-specific biological analysis determine that suitable habitat may be present for any such species, protocol habitat assessments/surveys shall be completed in accordance with CDFW, NMFS, and/or USFWS protocols prior to issuance of any construction permits. If projects are located within the Santa Rosa Plain Area, surveys shall be conducted for CTS in accordance with the Santa Rosa Plain Conservation Strategy (2005) with prior written approval from CDFW and USFWS. Due to numerous documented occurrences of CTS in the Santa Rosa Plain in conjunction with the documented dispersal distances for the species of up to 1.3 miles, it has been established that CTS are present within many grassland and vernal pool habitats within the Santa Rosa Plain rendering surveys unnecessary, and therefore any protocol CTS surveys shall be approved in writing by CDFW and USFWS prior to conducting the survey and habitat compensation for impacts to CTS habitat shall be provided by the Project pursuant to the Santa Rosa Plain Conservation Strategy even if sur ults are negative, unless otherwise approved in writing by CDFW and USFWS. If impacts to grassland or vernal abitat will occur, the Project shall consult with CDFW to determine if a CESA ITP for CTS is warranted. If CESA listed animal species such as CTS cannot be avoided, the Project shall obtain a CESA ITP from CDFW prior to Project construction. For impacts to ESA listed wildlife species such as CTS, the Project shall obtain authorization from USFWS. While often consistent with the Santa Rosa Plain Conservation Strategy, the CESA ITP habitat compensation requirements may differ from it based on a site-specific analysis. If through consultation with the CDFW, NMFS, and/or USFWS it is determined that protocol habitat assessments/surveys are not required, the applicant shall complete and document this consultation and submit it to the County prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they understand the protocol requirements and shall hire a qualified biologist to conduct protocol surveys.	The County shall verify that the required protocol surveys have been conducted by a qualified biologist	Prior to issuance of construction permits	Once	Permit Sonoma, Planning Division			
BIO-6: Endangered/Threatened Animal Species Avoidance and Minimization							
The following measures shall be applied to aquatic and/or terrestrial animal species as determined by the project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1. 1. Ground disturbance shall be limited to the minimum necessary to complete the project. A qualified biologist shall flag the project limits of disturbance. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance. 2. All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and October 31 to avoid impacts to sensitive aquatic species. Any work outside these dates would require project-specific approval from the County and may be subject to regulatory agency approval. 3. All projects occurring within or adjacent to sensitive habitats that may support federally and/or state-listed endangered/threatened species shall have a CDFW- and/or USFWS-approved biologist present during all initial ground disturbing/vegetation clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed, said biologist shall conduct daily pre-activity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the CDFW, NMFS, and/or USFWS, said biologist may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are fully implemented. 4. No endangered/threatened species shall be captured and relocated without express permission from the CDFW, NMFS, and/or USFWS. 5. If at any time during project construction an endangered/threatened species enters the construction site or otherwise may be impacted by the project, all project activities shall cease. A CDFW/USFWS-approved biologist shall document the occurrence and consult with the CDFW and USFWS, as appropriate, to determine whether it was safe for project activities to resume. 6. For all projects occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete. 7. All vehicle maintenance/fueling/staging shall occur not less than 100 feet from any riparian habitat or water body, including seasonal wetland features. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies. 8. No equipment shall be permitted to enter wetted portions of any affected drainage channel. 9. If project activities could degrade water quality, water quality sampling shall be implemented to identify the pre-project baseline, and to monitor during construction for comparison to the baseline. 10. If water is to be diverted around work sites, the applicant shall submit a diversion plan (depending upon the species that may be present) to the CDFW, RWQCB, USFWS, and/or NMFS for their review and approval prior to the start of any	The County shall verify that avoidance and minimization measures are applied to sites that are determined to have aquatic and/or terrestrial animal species by the Biological Resources Screening and Assessment required under Mitigation Measure BIO-1.	Prior to construction	Once	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
construction activities (including staging and mobilization). If pumps are used, all intakes shall be completely screened with wire mesh not larger than five millimeters to prevent animals from entering the pump system. 11. At the end of each workday, excavations shall be secured with cover or a ramp provided to prevent wildlife entrapment. 12. All trenches, pipes, culverts, or similar structures shall be inspected for animals prior to burying, capping, moving, or filling. 13. The CDFW/USFWS-approved biologist shall remove invasive aquatic species such as bullfrogs and crayfish from suitable aquatic habitat whenever observed and shall dispatch them in a humane manner and dispose of properly. 14. Considering the potential for projects to impact federally and state-listed species and their habitat, the applicant shall contact the CDFW and USFWS to identify mitigation banks within Sonoma County during project development. If the results of the project-specific biological analysis (Mitigation Measure BIO-1) determine that impacts to federally and state threatened or endangered species habitat are expected, the applicant shall explore species-appropriate mitigation bank(s) servicing the region for purchase of mitigation credits. If projects are located within the Santa Rosa Plain Area, mitigation for impacts to CTS shall be implemented in accordance with the Santa Rosa Plain Conservation Strategy (2005). 15. For projects occurring in the Petaluma BSA (PET-1 through PET-4), prior to grading and construction in natural areas of containing suitable upland habitat, a qualified biologist shall conduct a preconstruction survey for CTS. The survey shall include a transect survey over the entire project disturbance footprint (including access and staging areas), and mapping of burrows that are potentially suitable for salamander occupancy. If any CTS are detected, no work shall be conducted until the individual leaves the site of their own accord, unless federal and state "take" authorization has been issued for CTS relocation. Typical preconstruction survey procedures, such as burrow scoping and burrow collapse, cannot be conducted without federal and state permits. If any life stage of CTS is found within the survey area, the applicant shall consult with the USFWS and CDFW to determine the appropriate course of action to comply with the FESA and CESA, if permits are not already in place at the time of construction.							
BIO-7: Non-Listed Special Status Animal Species Avoidance and Minimization.							
The project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) shall identify some or all the below measures that will be required and applicable to the individual project: 1. For non-listed special status terrestrial amphibians and reptiles, a qualified biologist shall complete coverboard surveys within 14 days of the start of construction. The coverboards shall be at least four feet by four feet and constructed of untreated plywood placed flat on the ground as determined by the project-specific biological assessment (pursuant Mitigation Measure BIO-1). The qualified biologist shall check the coverboards once per week for each week after placement up until the start of vegetation removal. The biologist shall capture all non-listed special status and common animals found under the coverboards and shall place them in five-gallon buckets for transportation to relocation sites. The qualified biologist shall review all relocation sites and those sites shall consist of suitable habitat. Relocation sites shall be as close to the capture site as possible but far enough away to ensure the animal(s) is not harmed by project construction. Relocation shall occur on the same day as capture. The biologist shall submit CNDDB Field Survey Forms to the CFDW for all special status animal species observed. 2. Prior to construction, a qualified biologist shall conduct a survey of existing buildings to determine if bats are present. The survey shall be conducted during the non-breeding season (November through March). The biologist shall have access to all structures and interior attics, as needed. If a colony of bats is found roosting in any structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.). 3. If bats are roosting in the building during the daytime but are not part of an active maternity colony, then exclusion measures must include one-way valves that allow bats to get out but are designed so that the bats may not re-enter the structure. Maternal bat colonies shall not be disturbed. 4. A qualified biologist shall conduct pre-construction clearance surveys within 14 days of the start of construction (including staging and mobilization). The surveys shall cover the entire disturbance footprint plus a minimum 200-foot buffer, and shall identify all special status animal species that may occur on-site. All non-listed special status species shall be relocated from the site either through direct capture or through passive exclusion. The biologist shall submit a report of the pre-construction survey to the County for their review and approval prior to the start of construction. 5. A qualified biologist shall be present during all initial ground-disturbing activities, including vegetation removal to recover special status animal species unearthed by construction activities. 6. Project activities shall be restricted to daylight hours. 7. Upon completion of the project, a qualified biologist shall prepare a Final Compliance Report documenting all compliance activities implemented for the project, including the pre-construction survey results. The report shall be submitted to the County within 30 days of completion of the project.	The County shall verify that measures to avoid and minimize impacts to Non-Listed Special Status Animal Species are implemented into all projects for which the project-specific Biological Resources Screening and Assessment indicates it is necessary.	Prior to construction	Once	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
8. If special status bat species may be present and impacted by the project, a qualified biologist shall conduct, within 30 days of the start of construction, presence/absence surveys for special status bats in consultation with the CDFW where suitable roosting habitat is present. Surveys shall be conducted using acoustic detectors and by searching tree cavities, crevices, and other areas where bats may roost. If active roosts are located, exclusion devices such as netting shall be installed to discourage bats from occupying the site. If a qualified biologist determines a roost is used by a large number of bats (large hibernaculum), bat boxes shall be installed near the project site. The number of bat boxes installed will depend on the size of the hibernaculum and shall be determined through consultation with CDFW. If a maternity colony has become established, all construction activities shall be postponed within a 500-foot buffer around the maternity colony until it is determined by a qualified biologist that the young have dispersed. Once it has been determined that the roost is clear of bats, the roost shall be removed immediately.							
BIO-8: Western Pond Turtle Avoidance and Minimization							
For projects located on Rezoning Sites in the Penngrove BSA (PEN-1 through PEN-9), a qualified biologist shall conduct pre-construction clearance surveys for western pond turtle within 14 days prior to the start of construction (including staging and mobilization) in areas of suitable habitat. The biologist shall flag limits of disturbance for each construction phase. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance. If western pond turtles are observed, they shall be allowed to leave the site on their own.	The county shall verify that a qualified biologist has conducted a pre-construction clearance survey for western pond turtle for projects located in the Penngrove BSA.	Within 14 days prior to construction	Once	Permit Sonoma, Planning Division			
BIO-9: American Badger Avoidance and Minimization							
For projects on Rezoning Sites located in the Petaluma BSA (PET-1 through PET-4), a qualified biologist shall conduct surveys of the grassland habitat on-site to identify any American badger burrows/dens. These surveys shall be conducted not more than 14 days prior to the start of construction. Impacts to active badger dens shall be avoided by establishing exclusion zones around all active badger dens, within which construction related activities shall be prohibited until denning activities are complete or the den is abandoned. A qualified biologist shall monitor each den once per week in order to track the status of the den and to determine when a den area has been cleared for construction.	The County shall verify that a qualified biologist has conducted surveys of the grassland habitat on-site to identify any American badger burrows/dens for projects on sites PET-1 through PET-4.	Not more than 14 days prior to construction	Once	Permit Sonoma, Planning Division			
BIO-10: Pre-Construction Surveys for Nesting Birds for Construction Occurring within Nesting Season							
For projects on Rezoning Sites that require construction, grading, the removal of trees or vegetation, or other project-related improvements, construction activities shall occur outside of the nesting season (September 16 to January 31), and no mitigation activity is required. If construction activities must occur during the nesting season (February 1 to September 15), a qualified biologist shall conduct surveys for nesting birds within 14 days prior to project activities and shall conduct additional surveys if there is a lapse of 14 days or more in construction activities. The surveys shall include the entire disturbance area plus at least a 500-foot buffer around the project site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of 250 feet for non-raptor bird species and at least 500 feet for raptor species, unless determined otherwise by the qualified biologist. Buffer distances for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distances shall be specified to protect the bird's normal behavior thereby preventing nesting failure or abandonment. The buffer distance recommendation shall be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The qualified biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer is established. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. The biologist shall submit a report of these preconstruction nesting bird surveys to the County to document compliance within 30 days of its completion.	The County shall receive and review the nesting bird surveys conducted by a qualified biologist for all projects that involve that require construction, grading, the removal of trees or vegetation, or other project-related improvements.	Not more than 14 days prior to construction.	Once	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
BIO-11: Worker Environmental Awareness Program							
If potential impacts to special status species are identified in the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), prior to initiation of construction activities (including staging and mobilization), all personnel associated with project construction shall attend Worker Environmental Awareness Program training, conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the BSAs for the project. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of projects. All employees shall sign a form documenting provided by the trainer indicating they have attended the Worker Environmental Awareness Program and understand the information presented to them. The form shall be submitted to the County to document compliance.	The County shall receive and review a form signed by all personnel associated with project construction to verify that they have attended the Worker Environmental Awareness Program and understand the information presented to them.	Prior to initiation of construction activities	Once	Permit Sonoma, Planning Division			
BIO-12: Invasive Weed Prevention and Management Program							
For those projects on Rezoning Sites where activity would occur within or adjacent to sensitive habitats, as determined by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), prior to start of construction a qualified biologist shall develop an Invasive Weed Prevention and Management Plan to prevent invasion of native habitat by non-native plant species. A list of target species shall be included, along with measures for early detection and eradication. All disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas. In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six weeks since ground disturbing activities ceased. If exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a qualified biologist and in accordance with the restoration plan. Landscape species shall not include noxious, invasive, and/or non-native plant species that are recognized on the federal Noxious Weed List, California Noxious Weeds List, and/or California Invasive Plant Council Moderate and High-Risk Lists.	The County shall verify that a qualified biologist has developed an Invasive Weed Prevention and Management Plan for projects which include activity that would occur within or adjacent to sensitive habitats, as determined by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1).	Prior to the start of construction	Once	Permit Sonoma, Planning Division			
BIO-13: Sensitive Natural Community Avoidance							
If sensitive natural communities are identified through the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), the project shall be designed to avoid those communities to the maximum extent possible and all project elements associated with development shall be situated outside of sensitive habitats. Bright orange protective fencing installed at least 30 feet beyond the extent of the sensitive natural community during construction, or other distance as approved by a qualified biologist, to protect them from harm.	The County shall verify that the project is designed to avoid sensitive natural communities to the maximum extent possible and that all project elements associated with development shall be situated outside of sensitive habitats.	Prior to issuance of construction permit	Once	Permit Sonoma, Planning Division			
BIO-14: Permitting and Restoration for Impacts to Sensitive Natural Communities, Waters, and Wetlands							
Impacts to sensitive natural communities (including riparian areas and waters of the state or waters of the U.S. under the jurisdiction of the CDFW, USFWS, RWQCB, or USACE) shall require that the Project: 1. Submit an LSA Notification to CDFW (for impacts to streams or lakes and associated riparian habitat) and comply with the Final LSA Agreement, and 2. Obtain authorization from RWQCB and the USACE (for impacts to Waters of the U.S. or State including wetlands pursuant to the Clean Water Act). Impacts shall be mitigated as required by agency permits and at a minimum 1:1 mitigation impact ratio through the funding of the acquisition and in-perpetuity management of similar habitat, in-kind credits purchased from a conservation or mitigation bank, or on-site or off-site habitat restoration based on area and linear distance for permanent impacts, unless otherwise approved in writing by the agencies. Temporary impacts shall be restored on-site. The applicant shall provide funding and management of off-site mitigation lands through purchase of credits from an existing, approved mitigation bank or land purchased by the County and placed into a conservation easement or other covenant restricting development (e.g., deed restriction). Internal mitigation lands (internal to the Rezoning Sites), or in lieu funding sufficient to acquire lands, shall provide habitat at a minimum 1:1 ratio for impacted lands, comparable to habitat to be impacted by individual project activity. The applicant shall submit documentation of mitigation funds to the County. Please be advised that CDFW may not accept in-lieu fees as an appropriate method to mitigate impacts to streams or lakes and associated riparian habitat. 1. Restoration and Monitoring. If sensitive natural communities cannot be avoided and will be impacted by future projects, a compensatory mitigation program shall be implemented by the applicant in accordance with Mitigation Measure BIO-4 and the measures set forth by the regulatory agencies during the permitting process. All temporary impacts to sensitive natural communities shall be fully restored to natural condition.	The County shall receive, and review documentation of mitigation funds submitted by the applicant for the management of off-site mitigation lands through purchase of credits from an existing, approved mitigation bank or land purchased by the County and placed into a conservation easement or other covenant restricting development (e.g., deed restriction).	Prior to issuance of construction permit	Once	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
2. Sudden Oak Death. The applicant shall inspect all nursery plants used in restoration for sudden oak death. Vegetation debris shall be disposed of properly and vehicles and equipment shall be free of soil and vegetation debris before entering natural habitats. Pruning tools shall be sanitized. To mitigate for the removal of trees, replacement trees shall be planted at the below minimum replacement to removal ratios: ▪ 1:1 for removal of non-native trees; ▪ 1:1 for removal of native trees other than oak (Quercus sp.) up to 3 inches diameter at breast height (DBH); ▪ 3:1 for removal of native trees other than oak 4 to 6 inches DBH; ▪ 6:1 for removal of native trees other than oak greater than 6 inches DBH; ▪ 4:1 for removal of oak trees up to 6 inches DBH; ▪ 5:1 for removal of oak trees greater than 6 inches to 15 inches DBH; and ▪ 10:1 for removal of oak trees greater than 15 inches in diameter Replacement tree plantings shall consist of five-gallon or greater saplings and locally-collected seeds, stakes, or other suitable nursery stock as appropriate, and shall be native species to the area adapted to the lighting, soil, and hydrological conditions at the replanting site. If acorns are used for oak tree replanting, each planting will include a minimum of three acorns planted at an approximately two-inch depth to minimize predation risk. Large acorns shall be selected for plantings. Replacement oaks shall come from nursery stock grown from locally-sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they are planted. The Project shall monitor and maintain, as necessary, all plants for five years to ensure successful revegetation. Planted trees and other vegetation shall each have a minimum of 85 percent survival at the end of five years. If revegetation survival and/or cover requirements do not meet established goals as determined by CDFW, the Project is responsible for replacement planting, additional watering, weeding, invasive exotic eradication, or any other practice, to achieve these requirements. Replacement plants shall be monitored with the same survival and growth requirements for five years after planting.							
BIO-15: Jurisdictional Delineation							
If potentially jurisdictional wetlands are identified by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), a qualified biologist shall complete a jurisdictional delineation. The jurisdictional delineation shall determine the extent of the jurisdiction for CDFW, USACE, and/or RWQCB, and shall be conducted in accordance with the requirement set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the County, USACE, RWQCB, and CDFW, as appropriate, for review and approval. Jurisdictional areas shall be avoided to the maximum extent possible. If jurisdictional areas are expected to be impacted, then the RWQCB would require a Waste Discharge Requirement permit and/or Section 401 Water Quality Certification (depending upon whether the feature falls under federal jurisdiction). If CDFW asserts its jurisdictional authority, then a Lake or Streambed Alteration Agreement pursuant to Section 1600 et seq. of the CFGC would also be required prior to construction within the areas of CDFW jurisdiction. If the USACE asserts its authority, then a permit pursuant to Section 404 of the CWA would be required. Furthermore, a compensatory mitigation program shall be implemented by the applicant in accordance with Mitigation Measure BIO-4 and the measures set forth by the regulatory agencies during the permitting process. Compensatory mitigations for all permanent impacts to waters of the U.S. and waters of the state shall be completed at a ratio as required in applicable permits. All temporary impacts to waters of the U.S. and waters of the state shall be fully restored to natural condition.	The County shall review and approve a preliminary jurisdictional delineation report for projects which may impact jurisdictional wetlands.	Prior to issuance of construction permits	Once	Permit Sonoma, , Planning Division			
BIO-16: General Avoidance and Minimization							
Projects shall be designed to avoid potential jurisdictional features identified in jurisdictional delineation reports. Projects on Rezoning Sites that may impact jurisdictional features shall provide the County with a report detailing how all identified jurisdictional features will be avoided, including groundwater draw down. 1. Any material/spoils generated from project activities shall be located away from jurisdictional areas or special status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls (non- monofilament), covers, sand/gravel bags, and straw bale barriers, as appropriate. 2. Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank. 3. Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative will be notified.	The County shall receive and review a report detailing how all identified jurisdictional features will be avoided, including groundwater drawdown for projects that may impact jurisdictional features.	Prior to issuance of construction permit	Once	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
BIO-17: Consistency with the Santa Rosa Plain Conservation Strategy							
For sites SAN-1 through SAN-10, the Biological Resources Screening and Assessment (Mitigation Measure BIO-1) shall assess projects for impacts to listed species included in the Santa Rosa Plain Conservation Strategy. Impacts to these species shall be evaluated and mitigated per the mitigation measures included in Chapter 5 of the Conservation Strategy.	The County shall verify that impacts identified in the Biological Resources Screening and Assessment (Mitigation Measure BIO-1) for sites SAN-1 through SAN-10 are evaluated and mitigated per the mitigation measures included in Chapter 5 of the Conservation Strategy.	Prior to issuance of construction permits	Once	Permit Sonoma, Planning Division			
Cultural Resources							
CUL-1: Architectural History Evaluation							
For any future project on a Rezoning Site that is on or adjacent to a property that includes buildings, structures, objects, sites, landscape/site plans, or other features that are 45 years of age or older at the time of or permit application, the project applicant shall hire a qualified architectural historian to prepare an historical resources evaluation. The qualified architectural historian or historian shall meet the Secretary of the Interior's (SOI) Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices recommended by the State Office of Historic Preservation to identify any potential historical resources in the proposed project area. Under the guidelines, properties 45 years of age or older shall be evaluated within their historic context and documented in a technical report and on Department of Parks and Recreation Series 523 forms. The report will be submitted to the County for review prior to any permit issuance. If no historic resources are identified, no further analysis is warranted. If historic resources are identified by the Architectural History Evaluation, the project shall be required to implement Mitigation Measure CUL-2.	The County shall verify that a qualified architectural historian has conducted an intensive evaluation in accordance with the guidelines and best practices recommended by the State Office of Historic Preservation to identify any potential historical resources in the proposed project area. The County shall review the technical report prepared by the qualified architectural historian.	Prior to demolition permit	Once	Permit Sonoma, Planning Division			
CUL-2: Architectural History Mitigation							
If historical resources are identified in an area proposed for redevelopment as the result of the process described in Mitigation Measure CUL-1, the project applicant shall reduce impacts. Application of mitigation shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g. preservation in place). In conjunction with any project that may affect the historical resource, the project applicant shall provide a report identifying and specifying the treatment of character-defining features and construction activities to the County for review and approval, prior to permit issuance, to avoid or substantially reduce the severity of the proposed activity on the historical qualities of the resource. Any and all features and construction activities shall become Conditions of Approval for the project and shall be implemented prior to issuance of construction (demolition and grading) permits.	The County shall review and approve a report identifying and specifying the treatment of character-defining features and construction activities to avoid or substantially reduce the severity of the proposed activity on the historical qualities of the resource.	Prior to permit issuance	Once	Permit Sonoma, Planning Division			
Mitigation measures may include but are not limited to compliance with the Secretary of the Interior's Standards for Treatment of Historic Properties and documentation of the historical resource in the form of a Historic American Building Survey (HABS)-like report. The HABS report shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements.	The County shall verify that any and all features and construction activities are implemented into the project.	Prior to issuance of construction permits	Once	Permit Sonoma, Planning Division			
CUL-3: Phase I Archaeological Resource Study							
Prior to project approval, the project applicant shall investigate the potential to disturb archaeological resources. If the project will involve any ground disturbance, a Phase I cultural resources study shall be performed by a qualified professional meeting the SOI's PQS for archaeology (National Park Service 1983). If a project would solely involve the refurbishment of an existing building and no ground disturbance would occur, this measure would not be required. A Phase I cultural resources study shall include a pedestrian survey of the project site and sufficient background research and field sampling to determine whether archaeological resources may be present. Archival research shall include a records search of the Northwest Information Center no more than two years old and a Sacred Lands File search with the NAHC. The Phase I technical report documenting the study shall include recommendations that must be implemented prior to and/or during construction to avoid or reduce impacts on archaeological resources, to the extent that the resource's physical constituents are preserved or their destruction is offset by the recovery of scientifically consequential information. The report shall be submitted to the County for review and approval, prior to the issuance of any grading or construction permits, to ensure that the identification effort is reasonable and meets professional standards in cultural resources management. Recommendations in the Phase I technical report shall be made Conditions of Approval and shall be implemented throughout all ground disturbance activities.	The County shall review and approve a Phase I cultural resources study for any development facilitated by the project that would involve ground disturbance.	Prior to the issuance of any grading or construction permits	Once	Permit Sonoma, Planning Division			
	The County shall verify that recommendations made in the Phase I cultural resources study are made into conditions of approval and implemented throughout all ground disturbance activities.	Prior to/ during construction	Periodically throughout construction	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
CUL-4: Extensive Phase I Testing							
For any projects on a Rezoning Site proposed within 100 feet of a known archaeological site and/or in areas identified as sensitive by the Phase I study (Mitigation Measure CUL-3), the project applicant shall retain a qualified archaeologist to conduct an Extended Phase I (XPI) study to determine the presence/absence and extent of archaeological resources on the project site. XPI testing shall comprise a series of shovel test pits and/or hand augured units and/or mechanical trenching to establish the boundaries of archaeological site(s) on the project site. If the boundaries of the archaeological site are already well understood from previous archaeological work and is clearly interpretable as such by a qualified cultural resources professional, an XPI will not be required. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s) and any XPI work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4.	The County shall review and approve an XPI report prepared by a qualified archeologist to determine the presence/absence and extent of archaeological resources on the project site for any projects proposed within 100 feet of a known archaeological site and/or in areas identified as sensitive by the Phase I study.	Prior to the issuance of any grading or construction permits	Once	Permit Sonoma, Planning Division			
All archaeological excavation shall be conducted by a qualified archaeologist(s) under the direction of a principal investigator meeting the SOI's PQS for archaeology (National Park Service 1983). If an XPI report is prepared, it shall be submitted to Sonoma County for review and approval prior to the issuance of any grading or construction permits. Recommendations contained therein shall be implemented for all ground disturbance activities.	The County shall verify all; recommendations contained in the XPI report are implemented for all ground disturbance activities.	During construction	Periodically throughout construction	Permit Sonoma, Planning Division			
CUL-5: Archeological Site Avoidance							
Any identified archaeological sites (determined after implementing Mitigation Measures CUL-3 and/or CUL-4) shall be avoided by project-related construction activities. A barrier (temporary fencing) and flagging shall be placed between the work location and any resources within 60 feet of a work location to minimize the potential for inadvertent impacts.	The County shall verify that project construction activities avoid any identified archeological site and that a barrier and flagging is placed between the work location and any resources within 60 feet of a work location.	During construction	Periodically throughout construction	Permit Sonoma, Planning Division			
CUL-6: Phase II Site Evaluation							
If the results of any Phase I and/or XPI (Mitigation Measures CUL-3 and/or CUL-4) indicate the presence of archaeological resources that cannot be avoided by the project (Mitigation Measure CUL-5) and that have not been adequately evaluated for CRHR listing at the project site, the qualified archaeologist will conduct a Phase II investigation to determine if intact deposits remain and if they may be eligible for the CRHR or qualify as unique archaeological resources. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s) and any Phase II work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4.	The County shall review and approve a Phase II Site Evaluation Report if the results of any Phase I and/or XPI indicate the presence of archaeological resources that cannot be avoided by the project and that have not been adequately evaluated for CRHR listing at the project site.	Prior to the issuance of any grading or construction permits.	Once	Permit Sonoma, Planning Division			
A Phase II evaluation shall include any necessary archival research to identify significant historical associations and mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit. The sample excavation will characterize the nature of the sites, define the artifact and feature contents, determine horizontal and vertical boundaries, and retrieve representative samples of artifacts and other remains.	The County shall verify that all recommendations in the Phase II report are implemented for all ground disturbance activities.	During Construction	Periodically throughout construction	Permit Sonoma, Planning Division			
If the archeologist and, if applicable, a Native American monitor (see Mitigation Measure TCR-4) or other interested tribal representative determine it is appropriate, cultural materials collected from the site shall be processed and analyzed in a laboratory according to standard archaeological procedures. The age of the materials shall be determined using radiocarbon dating and/or other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards. The significance of the sites shall be evaluated according to the criteria of the CRHR. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation publication "Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)." The report shall be submitted to Sonoma County for review and approval prior to the issuance of any grading or construction permits. Recommendations in the Phase II report shall be implemented for all ground disturbance activities.							

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
CUL-7: Phase III Data Recovery							
If the results of the Phase II site evaluation (Mitigation Measure CUL-6) yield resources that meet CRHR significance standards and if the resource cannot be avoided by project construction in accordance with Mitigation Measure CUL-5, the project applicant shall ensure that all recommendations for mitigation of archaeological impacts are incorporated into the final design and approved by the County prior to construction. Any necessary Phase III data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the SOI standards for archaeology according to a research design reviewed and approved by the County prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the California Office of Historic Preservation Planning Bulletin 5 (1991), Guidelines for Archaeological Research Design, or the latest edition thereof. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s) and any Phase III work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4.	The County shall approve the recommendations included in the Phase II site evaluation and verify that they are incorporated into the final project design for all projects in which the results of the Phase II site evaluation yield resources that meet CRHR significance standards and if the resource cannot be avoided by project construction.	Prior to construction	Once	Permit Sonoma, Planning Division			
As applicable, the final Phase III Data Recovery reports shall be submitted to Sonoma County prior to issuance of any grading or construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.	The County shall verify that any necessary Phase III data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, is carried out by a qualified archaeologist.	Prior to issuance of any grading or construction	Once	Permit Sonoma, Planning Division			
	The County shall verify that all recommendations in the final Phase III Data Recovery reports are implemented throughout all ground disturbance activities.	During construction	Periodically throughout construction	Permit Sonoma, Planning Division			
CUL-8: Cultural Resources Monitoring							
If recommended by Phase I, XPI, Phase II, or Phase III studies (Mitigation Measures CUL-3, CUL-4, CUL-6, and/or CUL-7), the project applicant shall retain a qualified archaeologist to monitor project-related, ground-disturbing activities. If archaeological resources are encountered during ground-disturbing activities, Mitigation Measures CUL-5 through CUL-7 shall be implemented, as appropriate. The archaeological monitor shall coordinate with any Native American monitor as required by Mitigation Measure TCR-4.	The County shall verify that the applicant has retained a qualified archeologist to monitor project-related, ground-disturbing activities if recommended by Phase I, XPI, Phase II, or Phase III studies.	Prior to construction	Once	Permit Sonoma, Planning Division			
	The County shall verify that if archaeological resources are encountered during ground-disturbing activities, Mitigation Measures CUL-5 through CUL-7 are implemented.	During construction	Periodically throughout construction	Permit Sonoma, Planning Division			
CUL-9: Unanticipated Discovery of Archaeological Resources							
If archaeological resources are encountered during ground-disturbing activities, work within 60 feet shall be halted and the project applicant shall retain an archaeologist meeting the SOI's PQS for archaeology (National Park Service 1983) immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of CCR Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. If the resource is of Native American origin, implementation of Mitigation Measures TCR-1 through TCR-4 may be required. Any reports required to document and/or evaluate unanticipated discoveries shall be submitted to the County for review and approval. Recommendations contained therein shall be implemented throughout the remainder of ground disturbance activities.	The County shall review and approve any reports required to document and/or evaluate unanticipated discoveries and verify that recommendations contained in are implemented throughout the remainder of ground disturbance activities.	During construction if archeological resources are encountered during ground disturbing activities	Once	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Geology and Soils							
GEO-1: Paleontological Review of Project Plans							
For projects with proposed ground-disturbing activity on Rezoning Sites, the project applicant shall retain a Qualified Professional Paleontologist to review proposed ground disturbance associated with development to: 1. Assess if the project will require paleontological monitoring; 2. If monitoring is required, to develop a project-specific Paleontological Resource Mitigation and Monitoring Program (PRMMP) as outlined in Mitigation Measure GEO-2; 3. Draft the Paleontological Worker Environmental Awareness Program as outlined in Mitigation Measure GEO-3; and 4. Define within a project specific PRMMP under what specific ground disturbing activity paleontological monitoring will be required and the procedures for collection and curation of recovered fossils, as described in Mitigation Measures GEO-4, GEO-5, and GEO-6. The Qualified Paleontologist shall base the assessment of monitoring requirements on the location and depth of ground disturbing activity in the context of the paleontological potential and potential impacts outlined in this section. A qualified professional paleontologist is defined by the SVP standards as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least two years (SVP 2010). The County shall review and approve the assessment before grading permits are issued.	The County shall review and approve an assessment of monitoring requirements prepared by a Qualified Professional Paleontologist.	Prior to the issuance of grading permits	Once	Permit Sonoma, Planning Division			
GEO-2: Paleontological Resources Mitigation and Monitoring Program							
For those projects on Rezoning Sites deemed to require a PRMMP under Mitigation Measure GEO-1 above, the Qualified Paleontologist shall prepare a PRMMP for submission to the County prior to the issuance of grading permits. The PRMMP shall include a pre-construction paleontological site assessment and develop procedures and protocol for paleontological monitoring and recordation. Monitoring shall be conducted by a qualified paleontological monitor who meets the minimum qualifications per standards set forth by the SVP. The PRMMP procedures and protocols for paleontological monitoring and recordation shall include: 1. Location and type of ground disturbance requiring paleontological monitoring. 2. Timing and duration of paleontological monitoring. 3. Procedures for work stoppage and fossil collection. 4. The type and extent of data that should be collected with recovered fossils. 5. Identify an appropriate curatorial institution. 6. Identify the minimum qualifications for qualified paleontologists and paleontological monitors. 7. Identify the conditions under which modifications to the monitoring schedule can be implemented. 8. Details to be included in the final monitoring report. Prior to issuance of a grading permit, copies of the PRMMP shall be submitted to the County for review and approval as to adequacy**.**	The County shall review and approve a PRMMP prepared by a Qualified Paleontologist.	Prior to issuance of grading permits	Once	Permit Sonoma, Planning Division			
GEO-3: Paleontological Worker Environmental Awareness Program (WEAP).							
Prior to any ground disturbance on Rezoning Sites underlain by geologic units with high paleontological resource potential, the applicant shall incorporate information on paleontological resources into the Project's Worker Environmental Awareness Training (WEAP) materials, or a stand-alone Paleontological Resources WEAP shall be submitted to the County for review and approval. The Qualified Paleontologist or his or her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff if fossils are discovered by construction staff. The Paleontological WEAP training shall be fulfilled simultaneously with the overall WEAP training, or at the first preconstruction meeting at which a Qualified Paleontologist attends prior to ground disturbance. Printed literature (handouts) shall accompany the initial training. Following the initial WEAP training, all new workers and contractors must be trained prior to conducting ground disturbance work. A sign-in sheet for workers who have completed the training shall be submitted to the County upon completion of WEAP administration.	The County shall review and approve a WEAP and verify that all workers have completed the required training.	Prior to any construction activities	Once	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
GEO-4: Paleontological Monitoring							
Paleontological monitoring shall only be required for those ground-disturbing activities identified under Mitigation Measure GEO-1, where construction activities (i.e., grading, trenching, foundation work) are proposed in previously undisturbed (i.e., intact) sediments with high paleontological sensitivities. Monitoring shall be conducted by a qualified professional paleontologist (as defined above) or by a qualified paleontological monitor (as defined below) under the supervision of the qualified professional paleontologist. Monitoring may be discontinued on the recommendation of the qualified professional paleontologist if they determine that sediments are likely too young, or conditions are such that fossil preservation would have been unlikely, or that fossils present have little potential scientific value. The monitoring depth required for each of the Rezoning Sites is provided in Table 4.7-3, in addition to the associated geologic unit.	The County shall verify that paleontological monitoring is conducted by a qualified paleontologist for projects which include ground-disturbing activities identified under Mitigation Measure GEO-1, where construction activities (i.e., grading, trenching, foundation work) are proposed in previously undisturbed (i.e., intact) sediments with high paleontological sensitivities.	Prior to construction	Once	Permit Sonoma, Planning Division			
GEO-5: Preparation and Curation of Recovered Fossils							
Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the University of California Museum of Paleontology), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Paleontologist.	The County shall verify that any salvaged significant fossils recovered from the project site are identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the University of California Museum of Paleontology), along with all pertinent field notes, photos, data, and maps.	Upon discovery of fossils on the project site	Once	Permit Sonoma, Planning Division			
GEO-6: Final Paleontological Mitigation Report							
Upon completion of ground disturbing activity (and curation of fossils if necessary) the Qualified Paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated. The report shall be submitted to the County prior to occupancy permits. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.	The County shall receive and review the final mitigation and monitoring report prepared by a Qualified Paleontologist.	Prior to issuance of occupancy permits	Once	Permit Sonoma, Planning Division			
Greenhouse Gas Emissions							
GHG-1: Comply with BAAQMD Project-Level Land Use Thresholds							
Individual residential projects facilitated by the Housing Element Update project on Rezoning Sites shall comply with the following BAAQMD thresholds for land use projects as defined in the BAAQMD CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans, published April 2022, or its later adopted successor. Projects on the Rezoning Sites shall include, at a minimum, the following design elements: 1. Buildings a. The project shall not include natural gas appliances or natural gas plumbing. 2. Transportation a. The project shall achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2. As noted in the BAAQMD CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans, a project designed and built to incorporate these design elements would contribute its fair share to achieve California's long-term climate goals, and an agency reviewing the project under CEQA can conclude that the project would not make a cumulatively considerable contribution to global climate change. If the County adopts a GHG reduction strategy that meets the criteria under CEQA Guidelines Section 15183.5(b), projects may comply with that GHG reduction strategy in lieu of implementing the BAAQMD project-level land use thresholds stated above.	The County shall verify that residential projects facilitated by the Housing Element Update comply with the BAAQMD CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans or that the project complies with the County GHG reduction strategy if one is adopted that meets the criteria under CEQA Guidelines Section 15183.5(b).	Prior to issuance of construction permit	Once	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Noise							
NOI-1: General Construction Activities Noise Reduction Measures							
If construction activities occur during nighttime hours as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation, within 0.5 mile of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), the following measures shall be implemented: 1. Nighttime construction noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m. 2. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis. 3. The analysis of nighttime construction activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider the type of construction equipment to be used and the potential noise levels at noise-sensitive receivers located within 0.5 mile of the Rezoning Site. 4. Provided the nighttime construction noise analysis determines that nighttime noise levels will not exceed 45 dBA L50, 50 dBA L25, 55 dBA L08, or 60 dBA L02 between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures. 5. Provided the nighttime construction noise analysis determines that nighttime noise levels would exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers or performing activities at a further distance from the noise-sensitive land use.	The County shall verify that general construction activities noise reduction measures are implemented for all projects which involve nighttime construction activities or applicable successor regulation, within 0.5 mile of a noise-sensitive receiver.	During construction	Ongoing throughout construction	Permit Sonoma, Planning Division			
NOI-2: Pile Driver Noise and Vibration Reduction Measures							
If pile driving activities occur within 2.8 miles of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), or, during daytime or nighttime hours, within 160 feet of a vibration-sensitive receiver (residences, research and advanced technology equipment), the following measures shall be implemented: 1. Daytime (7 a.m. to 10 p.m.) a. Pile Driving Vibration i. Use of a pile driver shall not occur within 160 feet of a vibration-sensitive receiver; ii. Daytime pile driving vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers 2. Nighttime (10 p.m. to 7 a.m.): a. Pile Driving Noise i. Nighttime pile driving noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m. ii. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis. iii. The analysis of nighttime pile driving activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider the type of pile driver to be used and potential noise levels at noise-sensitive receivers located within 15,000 feet of the Rezoning Site. iv. Provided the analysis concludes that noise levels will not exceed 45 dBA L50, 50 dBA L25, 55 dBA L08, or 60 dBA L02 between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures. v. Provided the analysis concludes that pile driving noise levels exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers to reduce noise levels. b. Pile Driving Vibration i. Use of a pile driver shall not occur within 160 feet of a vibration-sensitive receiver. ii. Nighttime pile driving vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers. iii. The project applicant shall retain a qualified consultant to prepare a project-specific construction vibration impact analysis. iv. The analysis of nighttime pile driving vibration shall be completed in accordance with industry standards. The analysis shall consider the type of pile driver to be used and potential vibration levels at vibration-sensitive receivers located within 160 feet of the Rezoning Site. v. Provided the analysis concludes vibration levels do not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, construction may proceed without additional measures.	The County shall verify that pile driver noise and vibration reduction measures are implemented for all projects which involve pile driving within 2.8 miles of a noise-sensitive receiver.	During construction	Ongoing throughout construction	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
vi. Provided the analysis concludes that pile driving vibration levels exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, additional measures shall be implemented to reduce vibration levels below the standard. These measures may include, but not be limited to, pre-drilling pile holes, utilizing a vibratory pile driver, or performing pile driving at a further distance from the noise-sensitive land use to reduce vibration levels							
NOI-3: Breaker Noise Reduction Measures							
If construction activities use a breaker noise during nighttime hours as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation, within 0.5 mile of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), one of the following measures shall be implemented: 1. Nighttime breaker noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m. 2. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis. 3. The analysis of nighttime breaker activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider type of breaker used and other factors of the environment and the potential noise levels at noise-sensitive receivers located within 0.5 mile of the Rezoning Site. 4. Provided the nighttime breaker noise analysis determines that nighttime noise levels will not exceed 45 dBA L50, 50 dBA L25, 55 dBA L08, or 60 dBA L02 between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures. 5. Provided the nighttime breaker noise analysis determines that nighttime noise levels would exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers or performing breaking at a further distance from the noise-sensitive land use.	The County shall verify that breaker noise reduction measures are implemented.	During construction	Ongoing throughout construction	Permit Sonoma, Planning Division			
NOI-4: Blasting Noise and Vibration Reduction Measures							
If construction activities using blasting occurs during construction on a Rezoning Site, the following measure shall be implemented: 1. Daytime (7 a.m. to 10 p.m.) a. Blasting Vibration i. Daytime blasting vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers 2. Nighttime (as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation: a. Blasting Noise i. Nighttime blasting noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m. ii. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis. iii. The analysis of nighttime blasting activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider the blasting plan and potential noise levels at noise-sensitive receivers located within 0.25 mile of the Rezoning Site. iv. Provided the analysis concludes that noise levels will not exceed 45 dBA L50, 50 dBA L25, 55 dBA L08, or 60 dBA L02 between the hours of 10 p.m. to 7 a.m. construction may proceed without additional measures. v. Provided the analysis concludes that pile driving noise levels exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers to reduce noise levels. b. Blasting Vibration i. Nighttime blasting vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers within 0.25 mile feet of the Rezoning Site. ii. The project applicant shall retain a qualified consultant to prepare a project-specific construction vibration impact analysis. iii. The analysis of nighttime blasting vibration shall be completed in accordance with industry standards. The analysis shall consider the blasting plan and potential vibration levels at vibration-sensitive receivers located within 0.25 mile of the Rezoning Site.	The County shall verify that blasting noise and vibration reduction measures are implemented.	During construction	Ongoing throughout construction	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
iv. Provided the analysis concludes vibration levels do not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, blasting may proceed without additional measures. v. Provided the analysis concludes that pile driving vibration levels exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, additional measures shall be implemented to reduce vibration levels below the standard. These measures may include, but not be limited to, blasting mats shall be implemented to reduce vibration levels below the threshold.							
NOI-5: HVAC Noise Reduction Measures							
For any individual project on a Rezoning Site that would place one or more HVAC unit(s) within 30 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of the HVAC unit(s) shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses, listed in Table 4.13 4. The analysis shall be completed in accordance with the County's current Guidelines for the Preparation of Noise Analysis. Noise control measures shall include, but are not limited to, the selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.	The County shall require a project-specific design plan demonstrating that the noise level from operation of the HVAC unit(s) shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses for projects which would place one or more HVAC unit(s) within 30 feet of an existing noise-sensitive receiver.	Concurrently with design review and prior to the approval of building permits	Once	Permit Sonoma, Planning Division			
NOI-6: Generator Noise Reduction Measures							
If an individual project on a Rezoning Site would place permanent backup generators within 300 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of generators shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses, listed in Table 4.13 4. The analysis shall be completed in accordance with the County's current Guidelines for the Preparation of Noise Analysis. Project specific noise reduction measures shall be implemented into the design plan during construction by the project applicant. Noise control measures that could be implemented include, but are not limited to, the selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.	The County shall, require a project-specific design plan demonstrating that the noise level from operation of generators shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses for projects which would place permanent backup generators within 300 feet of an existing noise-sensitive receiver.	Concurrently with design review and prior to the approval of building permits	Once	Permit Sonoma, Planning Division			
NOI-7: Exterior and Interior Land Use Noise Compatibility Compliance							
Rezoning Sites with that may exceed noise compatibility standards include: GEY-1 through GEY-4, LAR-1, LAR-3, LAR-4, LAR-5, LAR-7, LAR-8, FOR-1, FOR-3, FOR-5, FOR-6, GRA-1, GRA-2, GRA-3, GRA-5, SAN-1 through SAN-10, GLE-1, AGU-2, AGU-3, PEN-1, PEN-3, PEN-5, PEN-6, PEN-8, PEN-9, PET-1 through PET-4, and SON-1 through SON-4. For Rezoning Sites where exterior noise levels may exceed 60 dB Ldn or greater in outdoor activity areas or where interior noise levels may exceed 45 dB Ldn or greater with windows and doors closed, the project applicant shall coordinate with the project architects and other contractors to ensure compliance with the County's noise standards to reduce noise levels in outdoor activity areas to less than 60 dB Ldn and interior noise levels to less than 45 dB Ldn with windows and doors closed. The specific project-level land use compatibility analysis shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The information in the analysis may include, for exterior areas, the layout and placement of the outdoor area, and for interior areas the wall heights and lengths, room volumes, window and door tables typical for a building plan, as well as information on any other openings in the building shell. With this specific plan information, the analysis shall determine the predicted exterior and interior noise levels at the planned buildings. If predicted noise levels are found to be in excess of the applicable limits, the report shall identify architectural materials or techniques that shall be incorporated into the project to reduce noise levels to the applicable limits. Measures to provide the required noise control may include, but are not limited to: 1. Exterior a) Use of sound walls between the outdoor areas and nearby roadways. b) Placement of the outdoor areas where building attenuation would partially block or fully block the line of sight between the area and nearby roadways.	The County shall verify that the project is in compliance with the County's noise standards.	Prior to issuance of construction permit	Once	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
2. Interior a) Installation of windows, doors, and walls with higher Sound Transmission Class ratings over minimum standards. Installation or air conditioning or mechanical ventilation systems to allow windows and doors to remain closed for extended intervals of time so that acceptable interior noise levels can be maintained.							
Population and Housing							
PH-1: Relocation Plan							
For Rezoning Sites that contain existing rental housing that would displace individuals during development, the project applicant shall prepare a relocation plan, similar to the requirements of Government Code Section 7260-7277. The relocation plan may include, but not be limited to: 1. Proper notification of occupants or persons to be displaced. 2. Provision of "comparable replacement dwelling" which means decent, safe, and sanitary; and adequate in size to accommodate the occupants. 3. Provision of a dwelling unit that is within the financial means of the displaced person. 4. Provision of a dwelling unit that is not subject to unreasonable adverse environmental conditions. This measure shall apply to future development projects on Rezoning Sites that may displace individuals and is not limited to development undertaken by a public entity or development that is publicly funded. The County shall approve the relocation plan prior to project approval.	The County shall approve the relocation plan submitted by the applicant for Rezoning Sites that contain existing rental housing that would displace individuals during development.	Prior to issuance of construction permit	Once	Permit Sonoma, Planning Division			
Transportation and Traffic							
TRA-1: Transportation Demand Management Program							
Prior to the issuance of building permits, the project applicant shall develop a Transportation Demand Management (TDM) program for the proposed project, including any anticipated phasing, and shall submit the TDM program to Permit Sonoma for review and approval. The TDM program shall identify trip reduction programs and strategies. The TDM program shall be designed and implemented to achieve trip reductions as required to reduce daily VMT and vehicle trips forecast for the project by 11.5 percent from the base year plus project value to reach the threshold value of 13.0, or other local threshold if one is later adopted, or a state or regional body provides more recent guidance. Trip reduction strategies that may be included in the TDM program include, but are not limited to, the following: 1. Provision of bus stop improvements or on-site mobility hubs 2. Pedestrian improvements, on-site or off-site, to connect to nearby transit stops, services, schools, shops, etc. 3. Bicycle programs including bike purchase incentives, storage, maintenance programs, and on-site education program 4. Enhancements to countywide bicycle network 5. Parking reductions and/or fees set at levels sufficient to incentivize transit, active transportation, or shared modes 6. Cash allowances, passes, or other public transit subsidies and purchase incentives 7. Enhancements to bus service 8. Implementation of shuttle service 9. Establishment of carpool, bus pool, or vanpool programs 10. Vanpool purchase incentives 11. Low emission vehicle purchase incentives/subsidies 12. Compliance with a future County VMT/TDM ordinance, if eligible 13. Participation in a future County VMT fee program 14. Participate in future VMT exchange or mitigation bank programs The TDM strategies depend heavily on context and area surrounding the Rezoning Sites	Permit Sonoma shall review and approve the Transportation Demand Management program submitted by the applicant.	Prior to the issuance of building permits	Once	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
TRA-2: Construction Traffic Management Plan							
To mitigate potential impacts and disruptions during project construction, the applicant shall submit a Construction Traffic Management Plan for County review and approval. The plan shall include, but not be limited to, the following: 1. A prohibition on all construction truck activity during the period 30 minutes prior to the beginning of school and 30 minutes after the end of the school day. 2. The provision of flaggers at all on-site locations where construction trucks and construction worker vehicles conflict with school vehicle, bicycle, or pedestrian traffic. 3. Preservation of emergency vehicle access. 4. Identification of approved truck routes in communication with the County. 5. Location of staging areas and the location of construction worker parking. 6. Identification of the means and locations of the separation (i.e. fencing) of construction areas. 7. Provision of a point of contact for incorporated and unincorporated Sonoma County residents to obtain construction information, have questions answered and convey complaints. 8. Identification of the traffic controls and methods proposed during each phase of project construction. Provision of safe and adequate access for vehicles, transit, bicycles, and pedestrians. Traffic controls and methods employed during construction shall be in accordance with the requirements of the Manual of Uniform Traffic Control Devices (Federal Highway Administration, 2009 Manual on Uniform Traffic Control Devices with Revisions 1 and 2, May 2012). 9. Provision of notice to relevant emergency services, thereby avoiding interference with adopted emergency plans, emergency vehicle access, or emergency evacuation plans. 10. Maintenance of bicycle and pedestrian access along the project's driveway for the duration of project construction.	The County shall review and approve the Construction Traffic Management Plan provided by the applicant.	Prior to construction	Once	Permit Sonoma			
Tribal Cultural Resources							
TCR-1: Tribal Cultural Resources Consultation							
If during the implementation of Mitigation Measure CUL-1, archival research results in the identification of an association between a historical built-environment resource and a local (traditionally and culturally affiliated) California Native American tribe, the qualified architectural historian or historian shall confer with the local California Native American tribe(s) on the implementation of Mitigation Measure CUL-2. Throughout the implementation of Mitigation Measures CUL-3 through CUL-9, the qualified archaeologist retained to implement the measures shall confer with local California Native American tribe(s) on the identification and treatment of tribal cultural resources and/or resources of Native American origin not yet determined to be tribal cultural resources through AB 52 consultation. If, during the implementation of Mitigation Measures CUL-3 through CUL-9, a resource of Native American origin is identified, the County shall be notified immediately in order to open consultation with the appropriate local California Native American tribe(s) to discuss whether the resource meets the definition of a tribal cultural resource.	If, during the implementation of Mitigation Measures CUL-3 through CUL-9, a resource of Native American origin is identified, the County shall open consultation with the appropriate local California Native American tribe(s) to discuss whether the resource meets the definition of a tribal cultural resource.	When the County is notified of a resource of Native American origin on the project site.	Once	Permit Sonoma, Planning Division			
TCR-2: Avoidance of Tribal Cultural Resources							
Development facilitated by the project on Rezoning Sites shall be designed to avoid known tribal cultural resources. Any tribal cultural resource within 60 feet of planned construction activities shall be fenced off to ensure avoidance. The feasibility of avoidance of tribal cultural resources shall be determined by the County and applicant in consultation with local (traditionally and culturally affiliated) California Native American tribe(s).	The County shall consult with local (traditionally and culturally affiliated) California Native American Tribes.	Prior to construction	Once	Permit Sonoma, Planning Division			
TCR-3: Tribal Cultural Resources Plan							
A tribal cultural resources Plan shall be required for Rezoning Sites identified as potentially sensitive for tribal cultural resources during consultation with local (traditionally and culturally affiliated) California Native American tribe(s) during the implementation of TCR-1 and/or by the qualified archaeologist during the implementation of CUL-3 through CUL-9. Prior to any development facilitated by the project that would include ground disturbance, the project applicant or its consultant shall prepare a tribal cultural resources treatment plan to be implemented in the event an unanticipated archaeological resource that may be considered a tribal cultural resource is identified during construction. The plan shall include any necessary monitoring requirements, suspension of all earth-disturbing work in the vicinity of the find, avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the local Native Americans and, if applicable, a qualified archaeologist. Examples of appropriate treatment for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, and heritage recovery. As appropriate, the tribal cultural resources treatment plan may be combined with any Extended Phase I, Phase II, and/or Phase III work plans or archaeological monitoring plans prepared for work carried out during the implementation of Mitigation Measures CUL-4, CUL-6, CUL-7, or CUL-8. The plan shall be reviewed and approved by the County and the appropriate local California Native American tribe(s) prior to construction to confirm compliance with this measure.	The County and the appropriate local California Native American tribe(s) shall review and approve the tribal cultural resources plan for Rezoning Sites identified as potentially sensitive for tribal cultural resources during consultation with local (traditionally and culturally affiliated) California Native American tribe(s) during the implementation of TCR-1 and/or by the qualified archaeologist during the implementation of CUL-3 through CUL-9.	Prior to construction	Once	Permit Sonoma, Planning Division			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
TCR-4: Native American Monitoring							
For Rezoning Sites identified as potentially sensitive for tribal cultural resources through consultation with local California Native American tribe(s) during the implementation of TCR-1, and/or identified as sensitive for cultural resources of Native American origin by the qualified archaeologist during the implementation of CUL-3 through CUL-9, the project applicant shall retain a traditionally and culturally affiliated Native American monitor to observe all ground disturbance, including archaeological excavation, associated with development facilitated by the project. Monitoring methods and requirements shall be outlined in a tribal cultural resources treatment plan prepared under Mitigation Measure TCR-3. In the event of a discovery of tribal cultural resources, the steps identified in the tribal cultural resources plan prepared under Mitigation Measure TCR-3 shall be implemented.	The County shall verify that the applicant has retained a traditionally and culturally affiliated Native American monitor to observe all ground disturbance, including archaeological excavation, associated with development facilitated by the project for development on rezoning sites identified as potentially sensitive for tribal cultural resources through consultation with local California Native American tribe(s) during the implementation of TCR-1, and/or identified as sensitive for cultural resources of Native American origin by the qualified archaeologist during the implementation of CUL-3 through CUL-9.	Prior to issuance of construction permit	Once	Permit Sonoma, Planning Division			
TCR-5: Sensitive Location of Human Remains							
For any development facilitated by the project on Rezoning Sites where human remains are expected to be present based on the results of tribal consultation during the implementation of TCR-1 and/or as identified by the qualified archaeologist, the County shall consult with local California Native American tribe(s) on the decision to employ a canine forensics team. If appropriate, the County shall require the use of a canine forensics team to attempt to identify human remains in a noninvasive way (e.g., non-excavation) for the purpose of avoidance, if avoidance is feasible (see Mitigation Measure TCR-2). Any requirements for the use of a canine forensics team shall be documented in the tribal cultural resources treatment plan prepared under Mitigation Measure TCR-3. Pending the results of any canine investigations, the tribal cultural resources treatment plan may require revision or an addendum to reflect additional recommendations or requirements if human remains are present.	The County shall consult with local California Native American tribe(s) on the decision to employ a canine forensics team for any development facilitated by the project where human remains are expected to be present based on the results of tribal consultation. If appropriate, the County shall require the use of a canine forensics team to attempt to identify human remains in a noninvasive way.	Prior to construction permit approval	Once	Permit Sonoma, Planning Division			
Utilities							
UTIL-1: Water and Wastewater Provider Capacity							
Future development proposed on the following sites shall be required to demonstrate that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary improvements to serve a Rezoning Site will be made prior to occupancy: 1. Rezoning Sites that need to demonstrate capacity from the applicable water service provider: GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4. 2. Rezoning Sites that need to demonstrate capacity from the applicable wastewater service provider GEY-1, GUE-2, GUE-3, LAR-1 through LAR-8, FOR-1, FOR-2, FOR-6, GRA-4, SAN-6, SAN-7, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4. 3. Rezoning Site GRA-4 shall be annexed into the Graton Community Services District prior to development of the site. The required documentation shall be provided to the County during the plan review and permit approval process for projects on the above-listed Rezoning Sites.	The County shall review and approve documentation that demonstrates sufficient water and wastewater capacity for rezoning sites which require this documentation.	During the plan review and permit approval process	Once	Permit Sonoma, Planning and Building Divisions			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Wildfire							
WFR-1: Construction Wildfire Risk Reduction							
The County of Sonoma shall require the following measures during project construction on Rezoning Sites: 1. Construction activities with potential to ignite wildfires shall be prohibited during red-flag warnings issued by the National Weather Service for the site. Example activities include welding and grinding outside of enclosed buildings. 2. Fire extinguishers shall be available onsite during project construction. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher. 3. Construction equipment powered by internal combustion engines shall be equipped with spark arresters. The spark arresters shall be maintained pursuant to manufacturer recommendations to ensure adequate performance. At the County's discretion, additional wildfire risk reduction requirements may be required during construction. The County shall review and approve the project-specific methods to be employed prior to building permit approval.	The County shall require wildfire risk reduction mechanisms during construction. The County shall review and approve the project-specific methods to be employed to reduce construction wildfire risk.	Prior to building permit approval	Once	Permit Sonoma, Fire Prevention and Planning Divisions			
WFR-2: Landscape Plan Wildfire Risk Reduction							
Project landscape plans for projects on Rezoning Sites shall include fire-resistant vegetation native to Sonoma County and/or the local microclimate of the site and prohibit the use of fire-prone species, especially non-native, invasive species**.**	The County shall verify that project landscape plans include fire- resistant vegetation native to Sonoma County and shall prohibit the use of fire-prone species, especially non-native, invasive species.	Prior to issuance of construction permit	Once	Permit Sonoma, Planning Division			
WFR-3: New Structure Locations.							
Prior to finalizing site plans, proposed structure locations shall, to the extent feasible given site constraints, meet the following criteria: 1. Located outside of known landslide-susceptible areas; and 2. Located at least 50 feet from sloped hillsides. If the location meets the above criteria, no additional measures are necessary. If the location is within a known landslide area or within 50 feet of a sloped hillside, structural engineering features shall be incorporated into the design of the structure to reduce the risk of damage to the structure from post-fire slope instability resulting in landslides or flooding. These features shall be recommended by a qualified engineer and approved by the County prior to the building permit approval.	The County shall approve structural engineering features intended to reduce risk of damage to the structure from post-fire slope instability resulting in landslides or flooding for all structures that are not either outside areas of known landslide susceptibility or located at least 50 feet from sloped hillsides.	Prior to building permit approval	Once	Permit Sonoma, Planning Division			

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EXHIBIT 1C

CEQA Findings of Fact

for

Sonoma County Housing Element Update

Pursuant to CEQA Sections 15091 and 15093 and Public Resources Code Section 21081

The Final Environmental Impact Report (Final EIR) prepared by the County of Sonoma (County) for the Sonoma County Housing Element Update ("the project") consists of the Draft EIR and Response to Comments on the Draft EIR. The Final EIR identifies significant environmental impacts that will result from implementation of the project. The County finds that the inclusion of certain mitigation measures as part of project approval will reduce all but the following significant impacts to levels that are less than significant: aesthetics, cultural resources, greenhouse gas emissions, hazards and hazardous materials, transportation and traffic, utilities and service systems, and wildfire. No feasible mitigation measures have been identified to reduce these impacts to a less-than-significant level or mitigation measures have been identified but would not reduce impacts to a level of less than significant; these impacts will remain significant unavoidable impacts of the project. These impacts will be overridden due to specific considerations that are described within this document.

As required by the California Environmental Quality Act (CEQA), the County, in adopting these CEQA Findings and Statement of Overriding Considerations, also adopts a Mitigation Monitoring and Reporting Program (MMRP) for the project. The County finds that the MMRP, which is incorporated by reference, meets the requirements of Public Resources Code Section 21081.6 by providing for the implementation and monitoring of measures intended to mitigate potentially significant effects of the project. In accordance with CEQA and the *CEQA Guidelines*, the County adopts these findings as part of the project approval. Pursuant to Public Resources Code Section 21082.1(c)(3), the County also finds that the Final EIR reflects the County's independent judgment as the lead agency for the project.

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1 Introduction

The purpose of these findings is to satisfy the requirements of Sections 15091 and 15092 of the California Environmental Quality Act (CEQA) Guidelines, associated with approval of the Sonoma County Housing Element Update. A statement of overriding considerations, found at the end of this document, consistent with Section 15093 is adopted separately. The CEQA statute (Public Resources Code Sections 21000 et seq.) and State CEQA Guidelines (Title 14, California Code of Regulations Sections 15000, et seq.) state that if it has been determined that a project may or will have significant impacts on the environment, then an Environmental Impact Report (EIR) must be prepared. Prior to approval of the project, the EIR must be certified pursuant to Section 15090 of the State CEQA Guidelines. When a certified Final EIR identifies one or more significant environmental impacts, the approving agency must make one or more of the following findings, accompanied by a brief explanation of the rationale for each identified significant impact (Section 15091 of the CEQA Guidelines).

- Changes or alterations have been required in, or incorporated into, such project that avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- 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.
- 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 EIR.

No findings are required for impacts that are less than significant and require no mitigation.

Section 15092 of the State CEQA Guidelines states that after consideration of a Final EIR, and in conjunction with making the Section 15091 findings identified above, the lead agency may decide whether to approve the project. A project that would result in a significant environmental impact can be approved only if the agency has eliminated or substantially lessened all significant effects on the environment where feasible.

Only when specific economic, legal, social, technological, or other considerations outweigh the unavoidable adverse environmental effects, can a project with unmitigated significant impacts be approved. Section 15093 requires the lead agency to document and substantiate any such determination in a Statement of Overriding Considerations. A Statement of Overriding Considerations is being adopted separately from these findings.

2 Project Description and Objectives

2.1 Project Description

The proposed project would update Sonoma County's current Housing Element, including goals, objectives, policies, and implementing programs. The Housing Element Update would rezone 59 urban sites located in designated Urban Service Areas throughout unincorporated Sonoma County, listed in Table 2-1 of the EIR, for by-right, high-density housing. In addition, 25 additional inventory sites do not require rezoning. The project would also add these sites to the County's Housing Element site inventory to comply with new inventory requirements in Housing Element law. All Rezoning Sites near incorporated areas are within or adjacent to voter-approved Urban Growth Boundaries. Current designations of the sites include agricultural, residential, commercial, and industrial uses. The sites include both undeveloped and developed parcels. A full list of sites, their addresses, their corresponding zoning and land use designations can be found in Table 2-2 of Section 2.0, Project Description, of the EIR.

The project includes 1) an update to the Sonoma County Housing Element; (2) a General Plan Map amendment as necessary and, where applicable, area plan amendments to change land uses and allowable densities on identified sites; (3) rezoning of sites to match new General Plan land uses or densities, or to add the Workforce Housing (WH) Combining District; and (4) this Program EIR to evaluate the potential environmental impacts of the project. The project is intended to facilitate and encourage housing development that could be developed over an 8-year period, commencing in 2023 and ending in 2031.

2.2 Project Characteristics

The proposed project would identify sites to be added to the County's General Plan Housing Element site inventory to comply with State law. The project would implement existing General Plan Policies and Programs that require the County to identify urban sites near jobs and transit which may appropriately accommodate additional housing. The project would also identify appropriate sites on which to place the WH Combining District, which would allow the development of jobs and/or housing on the same site or within walking distance from one another. The WH Combining District is an overlay added to sites with non-residential base zoning to allow for housing to be built on sites containing or adjacent to jobs.

Rezoning Sites analyzed for rezoning to R3 (High-Density Residential), with a base density of 20 units per acre, were assumed to be rezoned to allow a density of 20 to 22 units per acre, respectively, which represents the maximum buildout potential utilizing the County's Rental Housing Opportunity Area program, which automatically doubles a site's density for projects that include at least 40 percent of units as affordable to lower income households. Sites analyzed for rezoning to add the WH Combining District were assumed to allow a density of 20-24 units per acre, the maximum allowed in the WH Combining District. If all 59 sites were chosen to move forward in the rezoning project studied under this Program EIR, project implementation could increase the housing availability in the County to accommodate up to 3,312 additional dwelling units and approximately 8,246 additional people.

2.3 Project Objectives

1. Meet the State required RHNA for 6th Cycle Housing Element planning period of 2023-2031
2. Bring the General Plan into conformance with recently enacted State housing law
3. Identify housing policies and programs that enable the development of additional units and the preservation of existing units, that reduce governmental constraints to building housing, and that affirmatively further fair housing
4. Identify housing sites with a collective capacity to meet the County's RHNA, with buffer capacity
5. Encourage the development of higher-density housing in the County, increasing the overall availability of housing
6. Provide housing development opportunities throughout the urban areas of the Unincorporated County near jobs, transit, services, and schools
7. Implement existing goals, objectives, and policies of the Sonoma County General Plan that focus growth in established Urban Service Areas and encourage the development of infill sites to prevent sprawl and protect agricultural land and open space

3 Final Environmental Impact Report

The Final EIR consists of the Draft EIR, comments on the Draft EIR, and the responses to those comments including all appendices thereto. The Final EIR also includes the revisions made in response to comments on the Draft EIR and errata reflecting those text corrections made for purposes of clarity. The Final EIR is a single document; its contents supersede those of the Draft EIR on which it is based.

3.1 EIR Process

Based on the nature and scope of the Sonoma County Housing Element Update, State Clearinghouse No. 2022060323, the Sonoma County Board of Supervisors determined, based on substantial evidence, that the Sonoma County Housing Element Update may have a significant effect on the environment and prepared an EIR. The EIR was prepared, noticed, published, circulated, reviewed and completed in full compliance with the CEQA Public Resources Code Sections 21000 et seq. CEQA and the CEQA Guidelines (14 California Code of Regulations Sections 15000 et. Seq.), as follows:

- **Notice of Preparation and Initial Study**. After deciding that an EIR is required, the lead agency (the County) must file a Notice of Preparation soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (CEQA Guidelines Section 15082; Public Resources Code [PRC] Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. The NOP may be accompanied by an Initial Study that identifies the issue areas for which the project could create significant environmental impacts. The County prepared an NOP of the Draft EIR for a 45-day agency and public review period commencing June 15, 2022. Public comment closed on July 30, 2022.
- **Draft EIR Prepared.** The Draft EIR must contain a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing, and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; h) discussion of irreversible changes, and i) any identified areas of controversy. The County prepared a Draft EIR and circulated the draft for public review for a 47-day comment period that began on December 28, 2022 and ended on February 13, 2023. A corresponding Notice of Availability (NOA) was published to provide notification when the Draft EIR became available for public review.
- **Notice of Completion.** The lead agency must file a Notice of Completion with the State Clearinghouse when it completes a Draft EIR and prepare an NOA. The lead agency must place the Notice of Completion in the County Clerk's office for 30 days (PRC Section 21092) and send a copy of the notice of completion to anyone requesting it (CEQA Guidelines Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following methods: a) publication in a newspaper of general circulation; b) physical signage posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (PRC Sections 21104 and 21253). An NOC was prepared and submitted to the State Clearinghouse with the Draft EIR on December 28, 2022.
- **Final EIR.** A Final EIR must include a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments. The County prepared a Final EIR, which was published in July 2023.

- **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project (CEQA Guidelines Section 15090).
- **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (CEQA Guidelines sections 15042 and 15043).
- **Findings/Statement of Overriding Considerations**. For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (CEQA Guidelines Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
- **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures adopted or made conditions of project approval to mitigate significant effects.
- **Notice of Determination.** The lead agency must file a Notice of Determination (NOD) after deciding to approve a project for which an EIR is prepared (CEQA Guidelines Section 15094). A local agency must file the NOD with the county clerk. The NOD must be posted for 30 days and sent to anyone requesting notice previously. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (PRC Section 21167[c]).

3.2 Record of Proceedings

For the purposes of CEQA and the findings hereinafter set forth, the administrative record consists of those items listed in Section 21167.6(e) of the Public Resources Code. Pursuant to the requirements of State CEQA Guidelines Section 15091(e), the location and custodian of the documents and other materials that constitute the record of proceedings upon which these decisions are presented below.

County of Sonoma
Clerk of the Board
575 Administration Drive, Room 100 A
Santa Rosa, CA 95403
County of Sonoma
2550 Ventura Ave
Santa Rosa, CA 95403
Contact: Ross Markey, Comprehensive Planning Manager
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4 Findings

Public Resources Code section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]” The same statute states that the procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” Section 21002 goes on to state that “in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.” The mandates and principles announced in Public Resources Code section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which an EIR is required. (See Pub. Resources Code, § 21081, subd. (a); CEQA Guidelines, § 15091, subd. (a).) For each significant environmental effect identified in an EIR for a proposed project, the approving agency must issue a written finding, supported by substantial evidence, reaching one or more of three permissible conclusions.

The first such finding is that "[c]hanges 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." (CEQA Guidelines, § 15091, subd. (a)(1).)

The second permissible finding is that "[s]uch 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." (CEQA Guidelines, § 15091, subd. (a)(2).)

The third potential conclusion is that "[s]pecific 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." (CEQA Guidelines, § 15091, subd. (a)(3).)

Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors."

CEQA Guidelines section 15364 adds another factor: "legal" considerations. (See also *Citizens of Goleta Valley v. Board of Supervisors* ("Goleta II") (1990) 52 Cal.3d 553, 565.) The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417.) “‘[F]easibility’ under CEQA encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (Ibid.; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715; *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1507-1508 (the failure to meet project objectives can be sufficient evidence demonstrating infeasibility of an alternative).)

The CEQA Guidelines do not define the difference between "avoiding" a significant environmental effect and merely "substantially lessening" such an effect. The County must therefore glean the

meaning of these terms from the other contexts in which the terms are used. Public Resources Code section 21081, on which CEQA Guidelines section 15091 is based, uses the term "mitigate" rather than "substantially lessen." The CEQA Guidelines therefore equate "mitigating" with "substantially lessening." Such an understanding of the statutory term is consistent with the policies underlying CEQA, which include the policy that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." (Pub. Resources Code, § 21002.)

For purposes of these findings, the term "avoid" refers to the effectiveness of one or more mitigation measures to reduce an otherwise significant effect to a less-than-significant level. In contrast, the term "substantially lessen" refers to the effectiveness of such measure or measures to substantially reduce the severity of a significant effect, but not to reduce that effect to a less-than-significant level.

These interpretations are mandated by the holding in Laurel Hills Homeowners Association v. City Council (1978) 83 Cal.App.3d 515, 519-521, where the court of appeal held that an agency had satisfied its obligation to substantially lessen or avoid significant effects by adopting numerous mitigation measures, not all of which rendered the significant impacts in question to a less-than significant level.

CEQA Guidelines section 15091 requires only that approving agencies specify that a particular significant effect is "avoid[ed] or substantially lessen[ed]." The findings, for purposes of clarity, in each case will specify whether the effect in question has been reduced to a less-than-significant level or has simply been substantially lessened but remains significant. Moreover, although section 15091, read literally, does not require findings to address environmental effects that an EIR identifies as merely "potentially significant," these findings will nevertheless fully account for all such effects identified in the EIR.

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required; however, where such changes are infeasible or where the responsibility for modifying the project lies with some other agency. (CEQA Guidelines, § 15091, subd. (a), (b).)

In seeking to effectuate the substantive policy of CEQA to substantially lessen or avoid significant environmental effects to the extent feasible, an agency, in adopting findings, need not necessarily address the feasibility of both mitigation measures and environmentally superior alternatives when contemplating approval of a proposed project with significant impacts. Where a significant impact can be mitigated to an “acceptable” level solely by the adoption of feasible mitigation measures, the agency, in drafting its findings, has no obligation to consider the feasibility of any environmentally superior alternative that could also substantially lessen or avoid that same impact – even if the alternative would render the impact less severe than would the proposed project as mitigated. (*Laurel Hills Homeowners Ass’n v. City Council* (1978) 83 Cal.App.3d 515, 521; see also *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 730-731; and *Laurel Heights Improvement Ass’n v. Regents of the University of California* (“Laurel Heights I”) (1988) 47 Cal.3d 376, 400-403.)

In these Findings, the County explains that mitigation measures have been incorporated into the Draft EIR that would substantially lessen or avoid the project’s significant environmental effects The County also addresses the extent to which alternatives described in the EIR are (i) environmentally superior with respect to that effect and (ii)“feasible” within the meaning of CEQA.

These findings satisfy the requirements of Sections 15091, 15092, and 15093 of the State CEQA Guidelines and, along with the Final EIR, constitute the County's evidentiary and policy bases for its decision to approve the project in a manner consistent with the requirements of CEQA. In doing so, they disclose the final disposition of the significant impacts identified in the Final EIR and the reasons for not adopting the project alternative. The County also incorporates by reference all of the policies, programs and conditions of approval from the Housing Element Update that avoid or lessen environmental impacts. Adoption of the statement of overriding considerations allows the Board of Supervisors to approve the project, even though it would result in significant and unavoidable impacts.

4.1 Findings on Alternatives

In accordance with State CEQA Guidelines Section 15126.6, the Draft EIR analyzed a Reduced Development Alternative with fewer rezone sites, a Reduced Development Alternative that involves amending the zoning code that would allow for the placement of the WH Combining District on all the Rezoning Site, and a No Project Alternative. The Draft EIR conducted a comparative impact assessment of each of these Alternatives. See Section 6 of the Draft EIR.

Overall, the No Project Alternative is the environmentally superior alternative, although the No Project Alternative would still result in significant and unavoidable transportation, cultural resources, and wildfire impacts. Additionally, this alternative would not support key project objectives as it would not update the County's General Plan Housing Element or increase the opportunities for housing development in the County.

Alternative 1: No Project Alternative

The No Project Alternative is described in Section 6 of the Draft EIR and considers a scenario in which the 79 identified sites would not be incorporated into the Housing Element site inventory, and there would be no change in zoning or General Plan land use designations for the parcels identified for rezoning. Current uses on the Rezoning Sites would continue under this alternative, with future full buildout of the Rezoning Sites limited by the existing zoning and General Plan designations.

Finding

As described in Chapter 6 of the Draft EIR, this alternative would not accomplish the project objectives to update the General Plan's Housing Element in compliance with State-mandated housing requirements, including achieving the County's RHNA, nor would this alternative provide more housing development opportunities in urban service areas or encourage the development of additional high-density housing. As a consequence of non-compliance with State-mandated requirements, it is reasonable to assume that some housing projects in the County may proceed through use of the "builder's remedy," other Housing Accountability Act tools, or court orders. Development based on these tools rather than a certified Housing Element may result in numerous inconsistencies with the General Plan and potentially undesirable patterns of development, such as lower than ideal housing densities in areas served by water and sewer utilities.

Alternative 2: Workforce Housing Combining District

The Workforce Housing Combining District Alternative is described in chapter 6 of the Draft EIR and considers a project that would combine both commercial and residential uses on all 59 rezone sites.

It is assumed that this alternative would result in approximately 2,557 new dwelling units and approximately 6,281 new residents. This would result in approximately 2,203 new dwelling units and approximately 5,361 new residents more than would be developed under existing zoning.

Finding

As described in Section 6 of the Draft EIR, this alternative would not meet project objectives because no sites would be zoned exclusively for housing. Thus, this alternative would not meet sufficient project objectives and would not achieve the underlying project purpose. The Board of Supervisors therefore rejects the Workforce Housing Combining District Alternative as undesirable and infeasible and declines to adopt this alternative pursuant to the standards in CEQA and the CEQA Guidelines.

Alternative 3: Fewer Rezoning Sites

The Fewer Rezoning Sites Alternative is described in chapter 6 of the Draft EIR and considers a project that would remove the following sites from the sites inventory: FOR-1, FOR-2, SON-1, SON-2, SON-3, and SON-4. It is assumed that this alternative would result in approximately 2,898 new dwelling units and approximately 7,535 new residents. This would add approximately 2,599 new dwelling units and approximately 6,795 new residents more than development that occurs under existing zoning.

Finding

As described in Section 6 of the Draft EIR, this alternative would meet the project objectives to a lesser extent than the proposed project, as it would rezone fewer sites for increased housing development opportunities.

4.2 Less than Significant Impacts or Areas of No Impact

Although not require by CEQA, the Board of Supervisors hereby finds, based on the evidence in the record and as set forth in the Final EIR that the Project will not result in significant environmental project level or cumulative impacts in the following topical areas:

Agriculture and Forestry Resources

Impact AG-1

None of the Rezoning Sites occur on land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, development facilitated by the project would not convert these types of lands to non-agricultural use. None of the lands are under Williamson Act Contract and thus, these lands under this protection would not be converted to nonagricultural use.

Impact AG-2

None of the Rezoning Sites are situated in areas zoned for timberland production (TPZ) and, therefore, development facilitated by the project would not conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production. Development facilitated by the project would not result in the loss of forest land or conversion of forest land to non-forest use.

Air Quality

Impact AQ-1

The project would support the primary goals of the 2017 Clean Air Plan, would implement applicable control measures for the 2017 Clean Air Plan, and would not disrupt or hinder implementation of any 2017 Clean Air Plan control measures. The project's VMT increase would be less than the population increase.

Impact AQ-3

Development facilitated by the project would not expose sensitive receptors to substantial pollutant concentrations from CO hotspots or TACs. In addition, development facilitated by the project would not site new sensitive land uses near substantial pollutant generating land uses.

Impact AQ-4

Implementation of the project would not create objectionable odors that could affect a substantial number of people.

Biological Resources

Impact BIO-4

Development facilitated by the project would not impact wildlife movement due to the location of the Rezoning Sites in areas of existing development.

Impact BIO-5

Development facilitated by the project would be subject to the County's ordinances and requirements protecting biological resources, such as trees.

Cultural Resources

Impact CUL-3

The discovery of human remains is always a possibility during ground disturbing activities. Ground disturbance associated with development facilitated by the project may disturb or damage known or unknown human remains. This impact would be less than significant with adherence to existing regulations.

Energy

Impact ENR-1

Development facilitated by the project would not result in a significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources.

Impact ENR-2

Development facilitated by the project would not conflict with or obstruct an applicable renewable energy or energy efficiency plan.

Geology and Soils

Impact GEO-1

No Rezoning Sites are located in Alquist-Priolo Earthquake Fault Zone, and therefore development facilitated by the project would not directly or indirectly cause substantial adverse effects involving rupture of a known earthquake fault.

Impact GEO-2

Development facilitated by the project could result in exposure of people or structures to a risk of loss, injury, or death from seismic events. Development facilitated by the project could be located on a geologic unit or soil that is unstable or could become unstable resulting in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. This impact would be less than significant with compliance with applicable laws and regulations.

Impact GEO-3

Development facilitated by the project would include ground disturbance such as excavation and grading that would result in loose or exposed soil. This disturbed soil could be eroded by wind or during a storm event, which would result in the loss of topsoil. Adherence to existing permit requirements and County regulations would ensure this impact is less than significant.

Impact GEO-4

Development facilitated by the project may result in the construction of structures on expansive soils, which could create a substantial risk to life or property. This impact would be less than significant with compliance with the requirements of the California Building Code.

Impact GEO-5

Development facilitated by the project would not include septic tanks or alternative wastewater disposal systems on soils incapable of supporting such systems.

Hazards and Hazardous Materials

Impact HAZ-1

Development facilitated by the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, nor through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Impact HAZ-2

Development facilitated by the project could result in development on sites contaminated with hazardous materials. However, compliance with applicable regulations relating to site remediation would minimize impacts from development on contaminated sites.

Impact HAZ-3

The Rezoning Sites are not located within two miles of an airport. Development facilitated by the project would not result in a safety hazard or excessive noise for people residing or working in or near the Rezoning Sites.

Impact HAZ-4

Development facilitated by the project would not result in any physical changes that could interfere with or impair emergency response or evacuation. Therefore, the project would not result in interference with these types of adopted plans.

Hydrology and Water Quality

Impact HWQ-1

Development facilitated by the project would not violate water quality standards or Waste Discharge Requirements, or otherwise substantially degrade surface or groundwater quality.

Impact HWQ-2

Development facilitated by the project would not interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of local groundwater basins.

Impact HWQ-3

Development facilitated by the project would alter drainage patterns and increase runoff in the Rezoning Sites, but would not result in substantial erosion or siltation on or off site, result in increased flooding on or off site, exceed the capacity of existing or planned stormwater drainage systems, or generate substantial additional polluted runoff.

Impact HWQ-4

Development facilitated by the project would alter drainage patterns on and increase runoff from the Rezoning Sites. The Rezoning Sites within an area at risk from inundation by flood hazard would be required to comply with applicable General Plan goals and policies.

Impact HWQ-5

The Rezoning Sites are not within an area at risk from inundation by seiche or tsunami, and therefore would not be at risk of release of pollutants due to project inundation.

Impact HWQ-6

Development facilitated by the project would comply with adopted water quality control plans and sustainable groundwater management plans applicable to the Rezoning Sites.

Land Use and Planning

Impact LU-1

Project implementation would provide for orderly development in the unincorporated County and would not physically divide an established community.

Impact LU-2

The project would not result in a significant environmental impact due to a conflict with any land use plan and policy.

Mineral Resources

Impact MIN-1

Although mineral extraction sites occur throughout the County, none are within the Rezoning Sites.

Noise

Impact NOI-3

There are no Rezoning Sites within two miles of an airstrip or airport or within the noise contours for an airstrip or airport, and no impacts would occur from exposing residents or workers to excessive aircraft noise levels.

Population and Housing

Impact PH-1

Implementation of the project would accommodate an additional 8,246 new residents and 3,312 new housing units in the County. This would exceed population and housing forecasts established in the existing General Plan, but would be consistent with the ABAG population forecasts and the 6th cycle RHNA allocation housing requirements for the 2023- 2031 planning period.

Public Services and Recreation

Impact PS-1

Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered fire facilities to maintain acceptable service ratio response times or other objectives.

Impact PS-2

Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered police facilities to maintain acceptable service ratio response times or other objectives.

Impact PS-3

Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered school facilities, and pursuant to State law, payment of impact fees to mitigate demand on school facilities would be required.

Impact PS-4

Development facilitated by the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other objectives and would not increase the use of existing neighborhood and regional parks such that substantial physical deterioration of the facility would occur or be accelerated.

Impact PS-5

Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered library or other public facilities to maintain acceptable service ratios, response times, or other objectives, and the payment of property taxes funding library or other public facilities would be required.

Transportation and Traffic

Impact TRA-2

The proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact TRA-3

The proposed project would not result in inadequate emergency access.

Utilities and Service Systems

Impact UTIL-2

The project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, including the Central Disposal Site. The project would not impair the attainment of solid waste reduction goals and would comply with federal, State, and local statutes and regulations related to solid waste.

Wildfire

Impact WFR-1

The project includes Rezoning Sites that are in or near an SRA or Very High FHSZs, but development facilitated by the project would not substantially impair an adopted emergency response or evacuation plan.

4.3 Potentially Significant Impacts Mitigated to a Less Than Significant Level

These topical areas contain impacts of the Sonoma County Housing Element Update that are reduced to a less-than-significant level through the implementation of mitigation measures. Pursuant to California Public Resources Code Section 21081(a)(1) and CEQA Section 15091(a)(1), as to each impact, the County, based on the evidence in the record before it, finds that changes or alterations incorporated into the Sonoma County Housing Element Update mitigate, avoid, or substantially lessen to a level of insignificance these environmental impacts of the Project. The basis for the finding for each impact is set forth below.

Aesthetics

Impact AES-4

Development facilitated by the project would create new sources of light or glare that could adversely affect the visual environment.

Finding

The County finds that with incorporation of Mitigation Measure AES-2, which would set exterior lighting requirements to reduce impacts related to light and glare. Impacts related to light and glare would be mitigated to less than significant levels. Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, The Sonoma County Housing

Element Update that avoid or substantially lessen the significant environmental effect to the extent feasible.

Agriculture and Forestry Resources

Impact AG-3

The project would rezone some sites that are adjacent to agricultural uses, and may indirectly impact those uses.

Finding

The County finds that with incorporation of Mitigation Measure AG-1, which would require agricultural buffers to be put into place for development adjacent to active agricultural operations, impacts related to adjacent agriculture sites would be mitigated to less than significant levels. Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, The Sonoma County Housing Element Update that avoid or substantially lessen the significant environmental effect to the extent feasible.

Air Quality

Impact AQ-2

Project construction would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution levels or air quality nuisances.

Finding

The County finds that with incorporation of Mitigation Measure AQ-1 and AQ-2, which would require BAAQMD's basic construction and additional construction mitigation measures to be implemented into projects facilitated by the Housing Element Update, impacts related to air quality during construction would be mitigated to less than significant levels. Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, The Sonoma County Housing Element Update that avoid or substantially lessen the significant environmental effect to the extent feasible.

Biological Resources

Impact BIO-1

Future development facilitated by the project could impact special status species and their habitat during construction and/or operation.

Finding

The County finds that with incorporation of Mitigation Measures BIO-1 through BIO-12, which would require biological resource screening and assessment, special-status plant species surveys, avoidance of endangered/threatened species and special status plant species, avoidance of non-listed special status animal species, avoidance of the Western Pond Turtle and the American Badger, pre-construction surveys for nesting birds, a worker environmental awareness program, and an invasive weed prevention and management program, impacts related to special status species and their habitat would be mitigated to less than significant levels. Pursuant to CEQA Guidelines Section

15091 (a)(1), changes or alterations have been required in, or incorporated into, The Sonoma County Housing Element Update that avoid or substantially lessen the significant environmental effect to the extent feasible.

Impact BIO-2

Future development facilitated by the project could impact riparian habitat or sensitive natural communities during construction and/or operation.

Finding

The County finds that with incorporation of Mitigation Measures BIO-13 and BIO-14 , which would require development facilitated by the Housing Element Update to avoid sensitive natural communities and complete restoration for any impacts to sensitive natural communities, impacts to riparian habitat or sensitive natural communities would be mitigated to less than significant levels. Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, The Sonoma County Housing Element Update that avoid or substantially lessen the significant environmental effect to the extent feasible.

Impact BIO-3

Future development facilitated by the project could impact jurisdictional state or federally protected wetlands during construction and/or operation.

Finding

The County finds that with incorporation of Mitigation Measures BIO-15 and BIO-16, which would require jurisdictional delineation and general avoidance and minimization measures to protect jurisdictional wetlands, impacts to protected wetlands would be mitigated to less than significant levels. Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, The Sonoma County Housing Element Update that avoid or substantially lessen the significant environmental effect to the extent feasible.

Impact BIO-6

Development facilitated by the project within the Santa Rosa Plain Conservation Strategy Area could conflict with the Plan.

Finding

The County finds that with incorporation of Mitigation Measures BIO-17, which would require development facilitated by the Housing Element Update to incorporate the mitigation measures included in Chapter 5 of the Santa Rosa Plain Conservation Strategy, impacts related to a conflict between the project and the Santa Rosa Plan Conservation Strategy would be mitigated to less than significant levels. Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, The Sonoma County Housing Element Update that avoid or substantially lessen the significant environmental effect to the extent feasible.

Cultural Resources

Impact CUL-2

Development facilitated by the project has the potential to cause a substantial adverse change in the significance of an archaeological resource, including those that qualify as historical resources.

Finding

The County finds that with incorporation of Mitigation Measure CUL-3 through CUL-9, which would require architectural history evaluation and mitigation, Phase I studies for all projects that include ground disturbing activities, additional XPI, Phase II, and Phase III studies when deemed necessary by a Phase I study , archeological site avoidance, cultural resources monitoring, and the cessation of any work on site in the event that archaeological resources are uncovered on site while the resources are evaluated, impacts to archaeological and historic resources would be mitigated to less than significant levels. Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, The Sonoma County Housing Element Update that avoid or substantially lessen the significant environmental effect to the extent feasible.

Geology and Soils

Impact GEO-6

Development facilitated by the project may directly or indirectly destroy a unique paleontological resource or site or unique geologic feature during ground disturbing activities.

Finding

The County finds that with incorporation of Mitigation Measure GEO-1 through GEO-6, which would require paleontological review of project plans, incorporation of a Paleontological Resources Mitigation and Monitoring Program if deemed necessary by paleontological review, incorporation of a Paleontological Worker Environmental Awareness Program, paleontological monitoring, fossil curation, and creation of a Final Paleontological Mitigation Report, impacts related to paleontological resources would be mitigated to less than significant levels. Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, The Sonoma County Housing Element Update that avoid or substantially lessen the significant environmental effect to the extent feasible.

Noise

Impact NOI-1

Construction activities associated with development facilitated by the project could result in noise level increases that would exceed applicable construction noise standards at nearby noise sensitive receivers. Operational noise impacts from HVAC units and generators would potentially exceed County standards if located near noise-sensitive land uses. These would be significant impacts and mitigation measures would be required.

Finding

The County finds that with incorporation of Mitigation Measure NOI-1 through NOI-6, which would require noise reduction measures for construction activity, pile drivers, vibration, breakers, blasting,

HVACs, and generators, impacts related to construction and operational noise would be mitigated to less than significant levels. Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, The Sonoma County Housing Element Update that avoid or substantially lessen the significant environmental effect to the extent feasible.

Impact NOI-2

If pile driving or blasting is performed during construction, vibration from this equipment may exceed applicable standards.

Finding

The County finds that with incorporation of Mitigation Measures NOI-2 and NOI-4, which would require noise reduction measures for breakers, blasting, and HVACs, impacts related to vibration from pile driving or blasting would be mitigated to less than significant levels. Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, The Sonoma County Housing Element Update that avoid or substantially lessen the significant environmental effect to the extent feasible.

Impact NOI-4

Rezoning Sites located near industrial sources, within the 60 and 65 dB Ldn contours of nearby roadways, and/or located near railroad line/crossing may exceed the County's acceptable noise levels of 60 dB Ldn or less in outdoor activity areas and interior noise levels of 45 dB Ldn or less with windows and doors closed.

Finding

The County finds that with incorporation of Mitigation Measure NOI-7, which would require compliance with the County's noise standards, impacts related to noise from industrial uses and/or roadways would be mitigated to less than significant levels. Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, The Sonoma County Housing Element Update that avoid or substantially lessen the significant environmental effect to the extent feasible.

Population and Housing

Impact PH-2

Development facilitated by the project could displace existing housing or people, necessitating the construction of replacement housing elsewhere.

Finding

The County finds that with incorporation of Mitigation Measure PH-1, which would require the creation of a relocation plan, impacts related to displacing existing housing or people would be mitigated to less than significant levels. Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, The Sonoma County Housing Element Update that avoid or substantially lessen the significant environmental effect to the extent feasible.

Tribal Cultural Resources

Impact TCR-1

Development facilitated by the project has the potential to impact tribal cultural resources.

Finding

The County finds that with incorporation of Mitigation Measures TCR-1 through TCR-5, which would require tribal cultural resource consultation, avoidance of tribal cultural resources, the creation of a tribal cultural resources plan to be implemented in the event that an unanticipated archaeological resource is uncovered on site, Native American monitoring, and consultation with local California Native American tribe(s) on the decision to employ a canine forensics team for any development on project sites expected to contain human remains, impacts related to tribal cultural resources would be mitigated to less than significant levels. Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, The Sonoma County Housing Element Update that avoid or substantially lessen the significant environmental effect to the extent feasible.

4.4 Significant Impacts

The following impacts are described in detail in the EIR under the titles listed below. The EIR's descriptive discussions of each of these impacts and policies, and programs from the Sonoma County General Plan and Housing Element that avoid or lessen environmental impacts are incorporated by reference. The analysis of impacts compares the existing environment to the level of development that is anticipated to be built during the period from 2023 to 2031, the Housing Element Update's planning horizon.

Aesthetics

Impact AES-1

The proposed project would facilitate development on four sites (GEY-1, SAN-4, PEN-2, and PEN-7) where public views of scenic vistas are afforded. Full buildout of these sites could block public views or obstruct them.

There are no feasible mitigation measures which would reduce this impact.

Finding

The County finds that there are no feasible mitigation measures to reduce impacts to public views of scenic vistas as development facilitated by the project cannot be made to comply with subjective design guidelines to ensure preservation of public views of surrounding hillsides, forested lands, and areas near scenic vistas. Existing County Code design regulations will apply to the extent that they are objective. Thus, this impact would remain significant and unavoidable.

Impact AES-2

Rezoning Sites in Forestville and Graton border a State scenic highway, and Rezoning Sites in Guerneville and Glen Ellen are proximate to State scenic highways (GUE-1, FOR-1, FOR-3, FOR-5,

GRA-3, GRA-5, GLE-1, GLE-2, AGU-1, and AGU-2). Therefore, scenic resources could be affected if individual projects are visible from these roadways.

There are no feasible mitigation measures which would reduce this impact.

Finding

The County finds that there are no feasible mitigation measures to reduce impacts to public views of State scenic highways as development facilitated by the project cannot be made to comply with subjective design guidelines, and thus it cannot be guaranteed that projects on these ten sites would not remove or damage scenic resources within a State-designated highway, particularly by changing the character of visual resources. Thus, this impact would remain significant and unavoidable.

Impact AES-3

Individual projects implemented on 25 Rezoning Sites with high site sensitivity and where development would be dominant or co-dominant have the potential to adversely affect public views and community aesthetic character (GEY-1, GUE-4, LAR-7, FOR-1, FOR-2, FOR-3, FOR-4, FOR-5, FOR-6, GRA-3, GRA-5, GLE-1, GLE-2, PEN-1, PEN-2, PEN-3, PEN-4, PEN-5, PEN-7, PEN-8, PEN-9, PET-1, PET-2, PET-3, and PET-4).

Finding

The County finds that with incorporation of Mitigation Measure AES-1, which would require screening vegetation to be incorporated into project landscape plans, impacts on public views and community aesthetic character would be reduced. However, because development facilitated by the project cannot be made to comply with subjective design guidelines, it cannot be guaranteed that projects on these 25 sites would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.. No additional mitigation measures to reduce this impact to less than significant levels are feasible. This impact would be significant and unavoidable.

Cultural Resources

Impact CUL-1

The project has the potential to cause a significant impact on a historic resource if development facilitated by the project would cause a substantial adverse change in the significance of that resource.

Finding

The County finds that with incorporation of Mitigation Measure CUL-1 and CUL-2, which would require architectural history evaluation and mitigation, impacts to historic resources would be reduced. However, it is possible that development facilitated by the project may not be able to avoid impacts to a historical resource. Should a future project result in the demolition or substantial alteration of a historical resource, it would have the potential to materially impair the resource. Therefore, even with mitigation such as the Historic American Building Survey report, impacts may not be reduced to a less than significant level, and the impact would remain significant and unavoidable. No additional mitigation measures to reduce this impact to less than significant levels are feasible.

Greenhouse Gas Emissions

Impact GHG-1

Development facilitated by the Housing Element Update would not meet State GHG goals for 2030 or 2045.

Finding

The County finds that with incorporation of Mitigation Measure GHG-1, which would require projects facilitated by the Housing Element Update to comply with BAAQMD project-level land use thresholds, impacts related to greenhouse gas emissions would be reduced. However, due to the nature of residential development, there is no feasible mitigation available to reduce GHG emissions from fuel consumption associated with light-duty vehicles to a less than significant level, and therefore some projects may not comply with the thresholds. Thus, this impact would remain significant and unavoidable. No additional mitigation measures to reduce this impact to less than significant levels are feasible.

Hazards and Hazardous Materials

Impact HAZ-5

Development facilitated by the project could expose people or structures to risk of loss, injury, or death involving wildland fires.

Finding

The County finds that with incorporation of Mitigation Measures WFR-1 through WFR-3, which would require wildfire risk reduction measures to be incorporated into construction activities and landscape plans for projects and the incorporation of site constraints to limit wildfire risk, impacts related to wildland fires would be reduced. However, it is not possible to prevent a significant risk of wildfires or fully protect people and structures from the risks of wildfires. Thus, this impact would remain significant and unavoidable. No additional mitigation measures to reduce this impact to less than significant levels are feasible. This impact would be significant and unavoidable.

Transportation and Traffic

Impact TRA-1

The addition of vehicle miles traveled (VMT) by drivers coming from development facilitated by the project would result in an exceedance of VMT thresholds and conflict with policies seeking to reduce VMT in Sonoma County.

Finding

The County finds that with incorporation of Mitigation Measures TRA-1 and TRA-2, which would require a transportation demand management program and a construction traffic management plan to be created for all development facilitated by the Housing Element Update, impacts related to VMT would be reduced. Mitigation Measure TRA-1 would reduce home based VMT per resident. However, the reduction would not be sufficient to reduce impacts to less than significant.[2] TDM effectiveness research indicates that the implementation of all feasible TDM measures in suburban and rural environments would result in a maximum effectiveness of 10 percent (CAPCOA 2010).

Implementation of Mitigation Measure TRA-1 would reduce impacts, but not below the significance threshold, and therefore impacts would remain significant and unavoidable. No additional mitigation measures to reduce this impact to less than significant levels are feasible.

Utilities and Service Systems

Impact UTIL-1

Impacts related to stormwater drainage, electric power, natural gas, and telecommunication infrastructure would be less than significant. Impacts related to water and wastewater facilities would be significant due to Rezoning Sites that are not located adjacent to existing wastewater collection infrastructure; impacts would be less than significant with implementation of mitigation measures. However, water supply impacts would be significant and unavoidable, even with implementation of mitigation measures.

Finding

The County finds that with incorporation of Mitigation Measure UTIL-1, which would require documentation of water and wastewater provider capacity for select sites, With implementation of Mitigation Measure UTIL-1, development on Rezoning Sites GUE-1, GUE-2, FOR-1, FOR-2, FOR-4, FOR-6, GRA-1 through GRA-5, LAR-1 through LAR-8, PEN-2, PEN-4, PEN-9, PET-1, SAN-1, SAN-3, SAN-5 through SAN-8, SAN-10, and SON-1 through SON-4 would be adequately served by water and wastewater service providers. However, there is not substantial evidence to determine that development on Rezoning Sites GEY-1 through GEY-4 would be adequately served by California American Water – Geyserville. Therefore, impacts would be significant and unavoidable. No additional mitigation measures to reduce this impact to less than significant levels are feasible.
Wildfire

Impact WFR-2

The project includes Rezoning Sites that are in or near Moderate, High, and Very High FHSZs. Development facilitated by the project would expose project occupants and structures to wildfire risks for sites located in or near (within 2 miles of) SRAs or Very High FHSZs.

Finding

The County finds that with incorporation of Mitigation Measures WFR-1 through WFR-3, which would require wildfire risk reduction measures to be incorporated into construction activities and landscape plans for projects and the incorporation of site constraints to limit wildfire risk, impacts related to wildfire would be reduced. However, it is not possible to prevent a significant risk of wildfires or fully protect people and structures from the risks of wildfires,. Thus, this impact would remain significant and unavoidable. No additional mitigation measures to reduce this impact to less than significant levels are feasible. This impact would be significant and unavoidable.

5 Recirculation Not Required

The revisions made to the Draft EIR, and Housing Element policies are intended to reflect comments made by the public or the Planning Commission to enhance resource protection, and clarify plan policies or EIR analysis. No overall change in program, land uses, or infrastructure or other development not previously included in the Public Review Draft Housing Element Update has been made. These do not result in substantive changes that would rise to the level of "significant new information" requiring recirculation. Under Section 15088.5 of the CEQA Guidelines, recirculation of an EIR is required when "significant new information" is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. The term "information" can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. Pursuant to CEQA Guidelines § 15088.5, "significant new information" requiring recirculation includes, for example, a disclosure showing that:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The above standard is "not intend[ed] to promote endless rounds of revision and recirculation of EIRs." (*Laurel Heights Improvement Assn. v. Regents of the University of California* (1993) 6 Cal. 4th 1112, 1132.) "Recirculation was intended to be an exception, rather than the general rule." (Ibid.) CEQA case law emphasizes that "'[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new, and unforeseen insights may emerge during investigation, evoking revision of the original proposal.'" (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 736-737; see also *River Valley Preservation Project v. Metropolitan Transit Development Bd*. (1995) 37 Cal.App.4th 154, 168, fn. 11.) "'CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process.' In short, a project must be open for public discussion and subject to agency modification during the CEQA process." (*Concerned Citizens of Costa Mesa, Inc. v. 33rd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 936.) Here, the changes to the Draft EIR are exactly the kind of revisions that the case law recognizes as legitimate and proper

because they offer clarifying information to the reader and do not result in an exacerbation of existing impacts or create new impacts for the reasons set forth in Final EIR.

Exhibit 1D: Statement of Overriding Considerations

According to CEQA Guidelines 15021 (d), "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian. An agency shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing of competing public objectives when the agency decides to approve a project that will cause one or more significant effects on the environment."

This statement of overriding considerations describes the project benefits that outweigh its environmental impacts. It is adopted in accordance with Public Resources Code section 21081(b) and CEQA Guidelines Section 15093:

A. CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

B. When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record. The EIR for the Housing Element Update the changes to the existing environment that would occur as development facilitated by the Housing Element Update is built-out over time to the 2031 planning horizon. The significant, unavoidable impacts are described below. These are detailed in the respective sections of the Draft EIR.

   - Aesthetics
   - Cultural Resources
   - Greenhouse Gas Emissions
   - Hazards and Hazardous Materials
   - Transportation and Traffic
   - Utilities and Service Systems
   - Wildfire

These impacts are outweighed individually and collectively by the following benefits of the Sonoma County Housing Element Update.

- Through numerous legislative actions in the past several years, the State of California has identified the lack of housing as a significant area of public concern, leading to an unsustainable lack of housing affordability, increased homelessness, social stress related to increased poverty and a reduction in economic prosperity for many state residents. In the current RHNA cycle, Sonoma County has been allocated 3,824 units between 2023 and 2031. The 3,312 units estimated in the Housing Element Update provide for development of the RHNA units and creates an important level of flexibility to allow market forces to efficiently develop the required units.

- Under State law, the County must adopt a Housing Element Update which meets its assigned RHNA requirement and allow for future growth and development.
- The project creates the regulatory framework to improve and develop households of various sizes to meet the needs of residents at different income levels. To meet the targets set by Regional Housing Needs Assessment (RHNA), the County must accommodate the production of abundant and affordable new housing in a wide diversity of forms.
- The proposed project would preserve existing housing and prevent displacement through policies that would help to prevent displacement of lower-income households and increase the availability of affordable housing.

6 Conclusion

After balancing the specific economic, legal, social, technological, and other benefits of the proposed project, the Board of Supervisors of the County of Sonoma find that the significant unavoidable impacts may be considered "acceptable" due to the specific considerations listed herein, which outweigh the impacts.

The Board of Supervisors has considered the information presented in the EIR, as well as public testimony, and the record of proceedings in which the SDC Specific Plan was considered.

Recognizing that significant unavoidable impacts exist in aesthetics, cultural resources, greenhouse gas emissions, hazards and hazardous materials, transportation and traffic, utilities and service systems, and wildfire, the Board nevertheless finds that the b:enefits of the Sonoma County Housing Element Update outweigh the impacts of the Project. Having included all feasible mitigation measures in the Draft EIR, and recognized all unavoidable significant impacts, the Board hereby finds that each of the separate benefits of the Specific Plan, as stated herein, are determined to be unto themselves separated overriding considerations, independent of other benefits, and warrant adoption of the Sonoma County Housing Element Update.

Based on the foregoing findings, the Board of Supervisors hereby determines that:

1. All significant environmental impacts due to the adoption of the Sonoma County Housing Element Update have been eliminated or substantially lessened where feasible.
2. There are no feasible alternatives to the Project which would mitigate or substantially lessen the impacts while attaining most or all of the Project objectives.
3. Any remaining unavoidable significant environmental impacts are acceptable due to the factors stated herein, with adoption for a Statement of Overriding Considerations.

EXHIBIT 1C

CEQA Statement of Overriding Considerations

for

Sonoma County Housing Element Update

Pursuant to CEQA Sections 15091 and 15093 and Public Resources Code Section 21081

The following Statement of Overriding Considerations is made in connection with the approval of the Sonoma County Housing Element Update (hereafter referred to as the "Proposed Project"), to allow for the rezoning of 59 housing inventory sites in order to allow the County to meet their 2023-2031 RHNA requirement.

The Board of Supervisors of the County of Sonoma finds that the economic, social and other benefits of the Proposed Project outweigh the significant and unavoidable environmental impacts identified in the EIR and in the record. In making this finding, the Board of Supervisors has balanced the benefits of the Proposed Project against its significant and unavoidable environmental impacts in the following areas, which are further described in the FEIR and Findings of Fact:

1. Aesthetics:
    a. Impact AES-1:The proposed project would facilitate development on four sites where public views of scenic vistas are afforded. Full buildout of these sites could block public views or obstruct them.
    b. Impact AES-2: Rezoning Sites in Forestville and Graton border a State scenic highway, and Rezoning Sites in Guerneville and Glen Ellen are proximate to State scenic highways. Therefore, scenic resources could be affected if individual projects are visible from these roadways.
    c. Impact AES-3: Individual projects implemented on 25 Rezoning Sites have the potential to adversely affect public views and community aesthetic character.
2. Cultural Resources:
    a. Impact CUL-1: The project has the potential to cause a significant impact on a historic resource if development facilitated by the project would cause a substantial adverse change in the significance of that resource.
3. Greenhouse Gas Emissions:
    a. Impact GHG-1: Development facilitated by the Housing Element Update would not meet State GHG goals for 2030 or 2045.
4. Hazards and Hazardous Materials:
    a. Impact HAZ-5: Development facilitated by the project could expose people or structures to risk of loss, injury, or death involving wildland fires.

5. Transportation and Traffic
    a. Impact TRA-1: The addition of vehicle miles traveled (VMT) by drivers coming from development facilitated by the project would result in an exceedance of VMT thresholds and conflict with policies seeking to reduce VMT in Sonoma County.
6. Utilities and Service Systems
    a. Impact UTIL-1: Impacts related to stormwater drainage, electric power, natural gas, and telecommunication infrastructure would be less than significant. Impacts related to water and wastewater facilities would be significant due to Rezoning Sites that are not located adjacent to existing wastewater collection infrastructure; impacts would be less than significant with implementation of mitigation measures. However, water supply impacts would be significant and unavoidable, even with implementation of mitigation measures.
7. Wildfire
    a. Impact WFR-2: The project includes Rezoning Sites that are in or near Moderate, High, and Very High FHSZs. Development facilitated by the project would expose project occupants and structures to wildfire risks for sites located in or near (within 2 miles of) SRAs or Very High FHSZs.

The Board of Supervisors finds that each one of the following benefits of the Proposed Project independently warrant approval of the Proposed Project notwithstanding the unavoidable environmental impacts of the Proposed Project.

1. Through numerous legislative actions in the past several years, the State of California has identified the lack of housing as a significant area of public concern, leading to an unsustainable lack of housing affordability, increased homelessness, social stress related to increased poverty and a reduction in economic prosperity for many state residents. In the current RHNA cycle, Sonoma County has been allocated 3,824 units between 2023 and 2031. The 3,312 units estimated in the Housing Element Update provide for development of the RHNA units and creates an important level of flexibility to allow market forces to efficiently develop the required units.
2. Under State law, the County must adopt a Housing Element Update which meets its assigned RHNA requirement and allow for future growth and development.
3. The project creates the regulatory framework to improve and develop households of various sizes to meet the needs of residents at different income levels. To meet the targets set by Regional Housing Needs Assessment (RHNA), the County must accommodate the production of abundant and affordable new housing in a wide diversity of forms.
4. The proposed project would preserve existing housing and prevent displacement through policies that would help to prevent displacement of lower-income households and increase the availability of affordable housing.