


# Occidental Wastewater Transport and Treatment Project

## RECIRCULATED INITIAL STUDY/ PROPOSED MITIGATED NEGATIVE DECLARATION

## SCH NO. 2019119006

GRATON
community services district

March 2021

**Recirculated Initial Study/**
**Proposed Mitigated Negative Declaration**

# Graton Community Services District
# Occidental Wastewater Transport and Treatment Project

**Prepared for:**

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March 2021

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# 1. Introduction

## 1.1 Introduction and CEQA Process

The Graton Community Services District (Graton CSD), serving as the California Environmental Quality Act (CEQA) Lead Agency, has prepared this Recirculated Initial Study to provide the public, responsible agencies, and trustee agencies with information about the potential environmental effects of the Graton CSD Occidental Wastewater Transport and Treatment Project (project). Graton CSD is a local government agency that manages the public sewer system in the unincorporated community of Graton in Sonoma County. Graton CSD serves about 1,700 rural residents, as well as businesses. Graton CSD also provides reclaimed water to several agricultural producers in the Graton area. Graton CSD is governed by an elected, five-member Board of Directors.

Sonoma Water (formerly known as Sonoma County Water Agency) is a special district that provides flood protection and water supply services to Sonoma and Marin Counties and manages several sanitation zones and districts in Sonoma County. The sanitation zones include Airport/Larkfield/Wikiup, Geyserville, Penngrove, and Sea Ranch. The sanitation districts include the Occidental, Russian River, Sonoma Valley, and South Park County Sanitation Districts.

Graton CSD and Sonoma Water are proposing a project that would provide transport, treatment, storage, and disposal of dry weather wastewater from the Occidental County Sanitation District to the Graton CSD for a 10-year period. The project involves vehicle transport of wastewater from Occidental to Graton and construction of a new receiving station, concrete driveway pullout, retaining wall, and sewer lateral connection within and adjacent to Green Valley Road. Graton CSD would also enter into a 10-year agreement with Sonoma Water for the proposed transport, treatment, storage, and disposal of wastewater from Occidental.

A previous Initial Study/Proposed Mitigated Negative Declaration (IS/MND) was prepared in 2019 for the project that envisioned a proposal to construct a wastewater receiving station at 4115 North Gravenstein Highway. The IS/MND was circulated for a 30 day public review, from November 6, 2019 to December 5, 2019, to allow the public and agencies the opportunity to review and comment on the document. In accordance with the requirements of CEQA, Graton CSD provided a *Notice of Intent to Adopt a Mitigated Negative Declaration* to the public, responsible agencies, and the Sonoma County clerk. Graton CSD published a notice in the Press Democrat, a newspaper of general circulation in the area affected by the proposed project, and the notice was posted at the Sonoma County clerk's office for a period of at least 30 days. The IS/MND was submitted to the State Clearinghouse for review by state agencies, and to responsible and trustee agencies with jurisdiction by law over resources affected by the project. The IS/MND was made available for public review at the Graton CSD Administration Office, at the Forestville Library, as well as online at graton.org. Comments were received from five agencies during the 30-day comment period, as well as from individuals, including letters and verbal comments at a public meeting held on November 18, 2019.

Subsequent to the public review period and prior to considering adoption of the MND, Graton CSD determined that the property at 4115 North Gravenstein Highway would no longer be a viable site for a proposed wastewater receiving station. Therefore, Graton CSD is proposing to revise the wastewater receiving site, transport route, and associated sewer line improvements. Those revisions are evaluated in this Recirculated IS/MND.

The CEQA lead agency for the project is the Graton CSD. The Graton CSD contact person for the project is:

Jose Ortiz, PE, General Manager
Graton Community Services District
250 Ross Lane
Sebastopol, CA 95472
Phone: (707) 330-3542

## 1.2 Summary of Changes to the Project as Evaluated Under the 2019 IS/MND

The modified project includes construction of a wastewater receiving station, concrete driveway pullout, retaining wall, and sewer lateral connection on previously disturbed and developed lands within and adjacent to Green Valley Road. The modified project includes a new location for the proposed wastewater receiving station, elimination of the previously proposed new sewer main in Green Valley Road, and changes to the proposed wastewater transport route. This Recirculated IS/MND analyzes the revised project and the environmental impacts of these proposed changes.

### 1.2.1 Changes to Wastewater Receiving Station

The project evaluated in the 2019 IS/MND included installation of a wastewater receiving station on the east side of the Bridgeway Gas Station property at 4115 North Gravenstein Highway. Under the previously proposed project, Graton CSD would have obtained a 10-year temporary easement with the owner of the property at 4115 North Gravenstein Highway for operation of the wastewater receiving station. Graton CSD would have applied for a change to its service area boundary in order to include the property located at 4115 North Gravenstein Highway, and the Bridgeway Gas Station would have been connected to Graton CSD's sanitation system, which would have allowed for closure of the existing septic system on the property.

Under the modified project, Graton CSD proposes to install the wastewater receiving station adjacent to Green Valley Road west of Highway 116 (see Section 2 for a description). The modified project would not include improvements to the property at 4115 North Gravenstein Highway, and no temporary easement with the property owner of 4115 North Gravenstein Highway is proposed. The modified project would not include connection of the Bridgeway Gas Station to the Graton CSD sanitation system, closure of the existing septic system on the property, or a change to Graton CSD's service area boundary.

### 1.2.2 Changes to Sewer Main

The project evaluated in the 2019 IS/MND included installation of approximately 300 feet of new 6-inch sewer main within Green Valley Road connecting to an existing manhole in Green Valley Road near Hicks Road. The sewer main would have been installed across Highway 116, and would have utilized trenchless pipeline construction methods, such as jack-and-bore, requiring excavating sending and receiving pits at either end of the pipe segment. The 2019 IS/MND presumed that Caltrans may have required nighttime construction for the trenchless Highway 116 undercrossing. Anticipated nighttime work hours were assumed to be 7:00 p.m. to 7:00 a.m. Construction was estimated to require up to 5 nighttime work periods for the Highway 116 undercrossing.

The modified project would not include installation of a new sewer main within Green Valley Road. Instead, an approximately 85-foot lateral connection would be installed within a portion of Green Valley Road to connect the proposed wastewater receiving station to an existing manhole in Green

Valley Road. The modified project would not require installation of a sewer main across Highway 116. Trenchless pipeline construction methods, such as jack-and-bore, would not be required for the modified project, and no nighttime construction is anticipated for the modified project.

### 1.2.3 Changes to Wastewater Transport Route

Under the project evaluated in the 2019 IS/MND, transport trucks would have turned right (east) onto Green Valley Road from Highway 116 in order to access the previously proposed wastewater receiving station on the property at 4115 North Gravenstein Highway. Trucks would have exited the receiving station and travelled west on Green Valley Road to Highway 116.

Under the modified project, transport trucks would turn left (north) onto Ross Road from Graton Road, then right (east) onto Green Valley Road to access a proposed roadside receiving station (see Figure 3, Proposed Wastewater Transportation Route). Trucks leaving the station would turn right onto Highway 116, then right onto Mueller Road, then right onto Graton Road in route back to the Occidental Lift Station on Occidental-Camp Meeker Road.

## 1.3 Recirculated IS/MND CEQA Process

Pursuant to Section 15073.5 of the CEQA Guidelines, because the changes to the project are considered "substantial revisions" and the 2019 IS/MND had not been adopted by the Graton CSD, a Recirculated IS/MND has been prepared to disclose the revised project description and analyze the environmental impacts of the modified project.

Section 15073.5 of the CEQA Guidelines states:

> (a) A lead agency is required to recirculate a negative declaration when the document must be substantially revised after public notice of its availability has previously been given pursuant to Section 15072, but prior to its adoption. Notice of recirculation shall comply with Sections 15072 and 15073.
>
> (b) A "substantial revision" of the negative declaration shall mean: (1) A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or (2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.

Because the changes to the project include a new off-site location within public right-of-way contiguous to privately owned property, and new mitigation measures have been identified to address potential environmental impacts of the modified project, the District considers such changes to be "substantial revisions" pursuant to Section 15073.5 of the State CEQA Guidelines. Therefore, the Graton CSD, as the Lead Agency, has prepared this Recirculated IS/MND and has reviewed and revised to reflect its independent judgment, as required by Section 21082.1 of CEQA.

# 2. Project Background and Description

## 2.1 Project Background

The Occidental County Sanitation District (Occidental CSD) is managed by Sonoma Water. Historically, Occidental CSD discharged secondary treated recycled water into a pond located at the headwaters of Dutch Bill Creek in Occidental during the summer and to Dutch Bill Creek during the winter. A 1997 Cease and Desist Order (CDO) from the North Coast Regional Water Quality Control Board (NCRWQCB) directed the Occidental CSD to end discharges of secondary treated recycled water to Dutch Bill Creek by January 31, 2018. The 1997 CDO mandated the implementation of short-term solutions until a long-term capital improvement program to avoid continuous violation of waste discharge requirements is developed. Although short-term solutions are in place and the Occidental CSD is now in compliance with all regulatory requirements, Sonoma Water continues to work towards finding the most economical means of continuing to provide sanitary sewer services to the Occidental CSD while complying with the Waste Discharge Requirements adopted in Order R1-2012-0101 and CDO No. R1-2012-0102.

A series of potential alternatives presented over the course of two decades failed to gain community support or provide a viable economic option. After analyzing costs for facility modifications associated with wastewater transport compared to costs associated with treatment upgrade alternatives, Sonoma Water determined that annual operations and maintenance costs of wastewater transport to other sanitation facilities for treatment, storage, and disposal would be lower than operations and maintenance costs for facility upgrades. In addition, it was determined that there would be a lesser environmental impact with transporting wastewater compared to upgrading facilities. Therefore, in 2018, Sonoma Water decommissioned the Occidental CSD wastewater treatment facilities, constructed a truck fill/transfer station at the Occidental CSD's Lift Station on Occidental-Camp Meeker Road, and began trucking Occidental CSD's untreated wastewater 18 miles to the Airport-Larkfield-Wikiup Sanitation Zone (ALWSZ) wastewater treatment facility (WWTF) near the Town of Windsor. During heavy rainfall events when inflow to the Occidental CSD's Lift Station exceeds the storage capacity of the lift station, untreated wastewater is stored at the Occidental CSD's former wastewater treatment facility. As a result, untreated wastewater from the Occidental CSD is also transported, though less frequently, from the Occidental CSD's wastewater treatment facility located on Lu Dan Road to the ALWSZ WWTF.

Graton CSD, in partnership with Sonoma Water, is now proposing to provide treatment, storage, and disposal of wastewater from Sonoma Water's Occidental CSD over a 10-year agreement period. Whereas the Occidental CSD and ALWSZ are managed by Sonoma Water, the Graton CSD is a separate, independent, local government agency responsible for operating and maintaining wastewater treatment facilities in the unincorporated community of Graton. The proposed project would serve to reduce transport costs and mobile source air emissions by reducing the overall distance of wastewater transportation trips, and would help the Graton CSD solve a number of financial challenges including unstable rates, servicing a small customer base, high fixed costs for wastewater collection and treatment, and lack of revenue for future large projects.

## 2.2 Project Location and Surrounding Land Uses

The proposed wastewater receiving station site is located in the unincorporated community of Graton in western Sonoma County. The proposed improvements would be located within Graton CSD's service area boundary, within and adjacent to a portion of Green Valley Road west of Highway 116 (see Figure 1, Regional Location Map). The improvements would occur within the County of Sonoma's road right-of-way for Green Valley Road (See Figure 2, Proposed GCSD Improvements).

The proposed wastewater receiving station would occupy an approximately 1,400-square-foot area on the south side of Green Valley Road west of Highway 116 and Hicks Road. Contiguous land uses include single-family residences to the north and south of Green Valley Road. Additional land uses in the project vicinity include a private vineyard and orchard along Green Valley Road, residences along Hicks Road, and Bridgeway Gas Station, Blue Spruce Lodge (mobile home community), and Dutton Estate Winery and tasting room east of Highway 116.

Wastewater transport would primarily occur between the existing Occidental CSD Lift Station at Occidental-Camp Meeker Road and the proposed new wastewater receiving station that would be located adjacent to Green Valley Road (see Figure 3, Proposed Wastewater Transportation Routes). At certain times, wastewater would continue to be transported from the Occidental CSD Lift Station to the ALWSZ WWTF near the Town of Windsor using existing established routes (see Figure 3, Proposed Wastewater Transportation Routes).

## 2.3 Project Description

The Project Description is organized as follows:

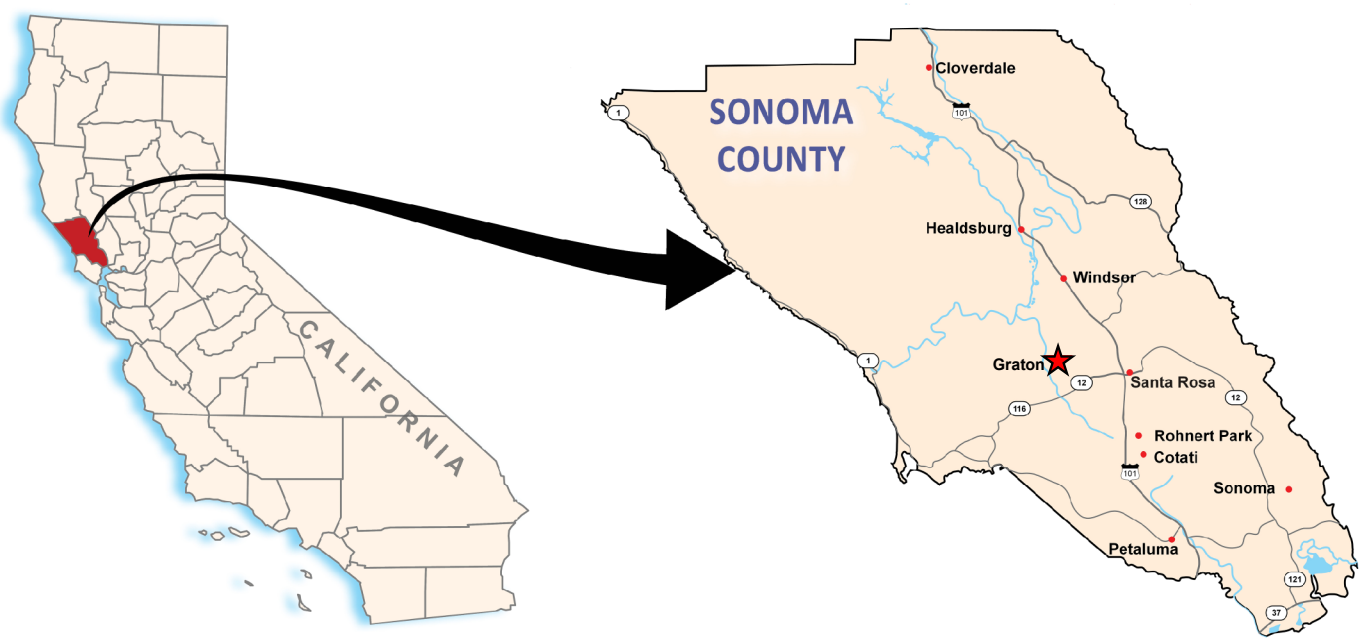
- Section 2.3.1 – Proposed Improvements
- Section 2.3.2 – Project Operations and Maintenance
- Section 2.3.3 – Project Construction

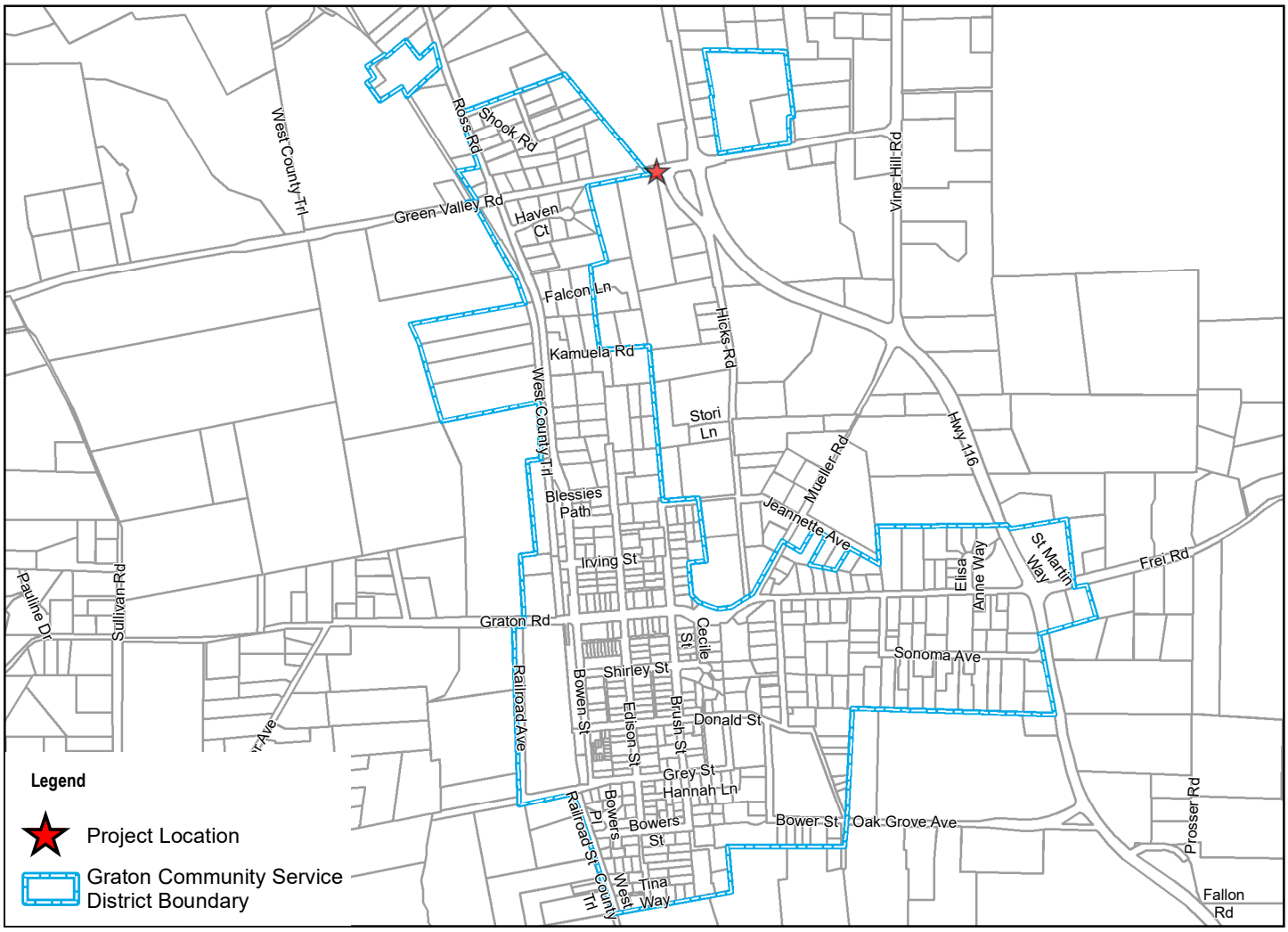
### 2.3.1 Proposed Improvements

#### New Graton CSD Wastewater Receiving Station and Sewer Connection

The proposed project would include the construction of a wastewater receiving station, concrete driveway pullout, new traffic striping, and sewer lateral connection on previously disturbed lands within and adjacent to Green Valley Road (see Figure 2, Proposed GCSD Improvements). Improvements associated with the wastewater receiving station would include a retaining wall, above- and below-ground piping and appurtenances, including valves, pipeline, electrical control panels, and signage.

A new approximately 20-foot wide and 70-foot long concrete driveway pullout would be installed on the south side of Green Valley Road, which would be accessed by wastewater transport trucks heading eastbound on Green Valley Road. An aboveground control box housing electrical controls and plumbing connections would measure approximately six feet in height, six feet in width, and approximately two feet in depth. If required, an existing below ground storm drain would be reconstructed beneath the concrete driveway pad. The existing storm drain conveys storm water to a roadside drainage ditch west of the proposed receiving station. The concrete pad would be graded to avoid runoff to adjacent properties, and runoff would be directed to a drain, which will discharge to the sanitary sewer system.

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Feet

Map Projection: Lambert Conformal Conic
Horizontal Datum: North American 1983
Grid: NAD 1983 StatePlane California II FIPS 0402 Feet

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GHD

**Occidental Wastewater Transport and Treatment Project**

## Regional Location Map

Project No. **11185760**
Revision No.
Date **Feb 2021**

# FIGURE 1

\\ghdnet\ghd\US\Santa Rosa\Projects\111\11185760 GCSD Occidental WW Treatment\08-GIS\Maps\Deliverables\Regional Location Map.mxd
Print date: 23 Feb 2021 - 11:54

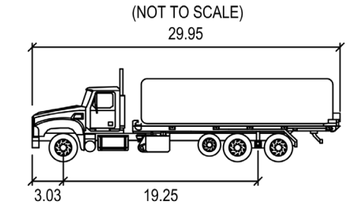
Data source: . Created by: mremillard




## NOTE

1. Typical dimensions of vac tank truck are shown below.

(NOT TO SCALE)




VAC TANK TRUCK
TRUCK DRIVEN @ 6MPH
1.0' MIRROR CLEARANCE INCLUDED

| | feet |
|---|---|
| WIDTH | : 7.87 |
| TRACK | : 8.04 |
| LOCK TO LOCK TIME | : 6.0 |
| STEERING ANGLE | : 35.4 |


View of Existing ALWSZ Receiving Station

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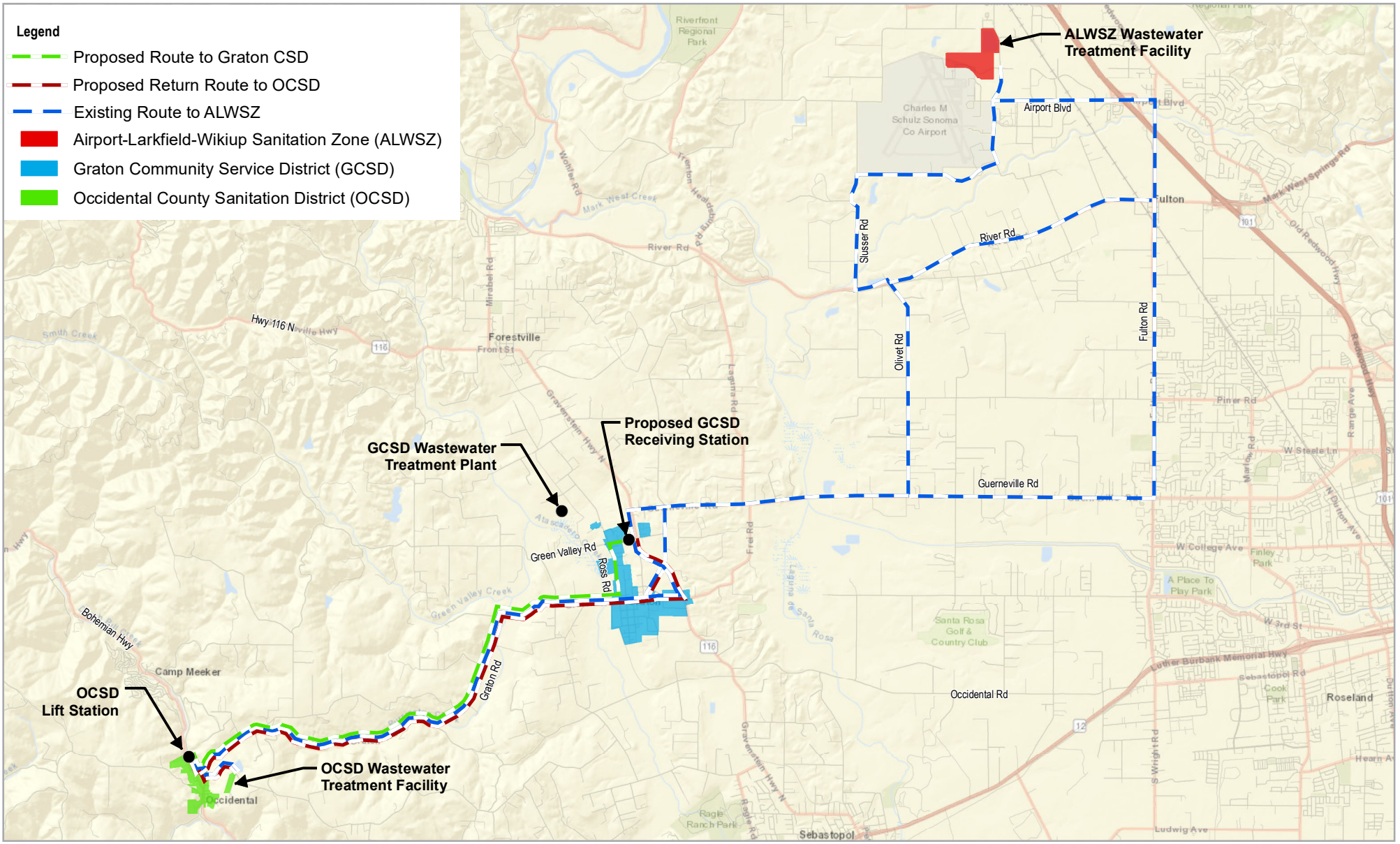
Occidental Wastewater Transport and Treatment Project

Proposed GCSD Improvements

Project No. 11185760
Revision No.
Date Feb 2021

FIGURE 2

Print date: February 24, 2021 1:35 PM




Paper Size ANSI A

0 0.7 1.4

Miles

Map Projection: Lambert Conformal Conic
Horizontal Datum: North American 1983
Grid: NAD 1983 StatePlane California II FIPS 0402 Feet

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**Occidental Wastewater Transport and Treatment Project**

**Proposed Wastewater Transportation Routes**

Project No. **11185760**
Revision No.
Date **Feb 2021**

**FIGURE 3**

\\ghdnet\ghd\US\Santa Rosa\Projects\111\11185760 GCSD Occidental WW Treatment\08-GIS\Maps\Deliverables\Proposed WW Trans Route.mxd
Print date: 24 Feb 2021 - 14:26

Data source: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community. Created by: rmremillard

Transport trucks would access the receiving station driveway from Green Valley Road, and would pull into the driveway and then connect to new receiving station control valves that would transfer the wastewater through a closed system to an existing sewer main within Green Valley Road. The process of transferring wastewater would include connecting the truck to the proposed receiving station with hoses and sealed control valves through a closed system. Wastewater would not be exposed to open air during the transfer process. Graton CSD would require drivers to be fully trained on operation of the transport trucks and the proposed receiving station. Standard operating procedures to eliminate the potential for leakage during the transfer process would be required, including full drainage of connecting hoses prior to disconnection.

While the use of new trucks, training of staff, and operation of transfers in accordance with standard operating procedures would minimize the potential for a leak or spill, the possibility of a spill or leak cannot be discounted. Therefore, the receiving station would include concrete curbing and drainage to contain any potential spill and would direct runoff into the wastewater collection system. Potable water would be available in secured containers to provide flush water, if needed. Bollards and a receiving station enclosure would be installed to protect the new control box. The receiving station would not require a new pump station or new lighting, as booster pumps on the transport trucks would provide pumping under pressure, and the receiving station would be utilized only during daytime hours.

The proposed driveway would be designed to be of sufficient length such that a 30-foot long transport truck would not obstruct the sight distance from turning movements at Hicks Road during offloading operations. The driveway would be required to comply with current County standards for stopping sight distance or driveway radii, or a design exception from the County would be required through an encroachment permit process.

A new 6-inch diameter sewer lateral would be installed to connect the wastewater receiving station to an existing Graton CSD 6-inch sewer main within Green Valley Road. The proposed sewer lateral would be installed at a depth of approximately 4 to 5-feet below ground surface.

Beyond the improvements described above, no additional modifications to Graton CSD's wastewater treatment facilities would be required for treatment, storage, and disposal of Occidental CSD's wastewater flows.

### 2.3.2 Project Operation and Maintenance

#### Agreement Between Sonoma Water and Graton CSD

The proposed project would include a 10-year agreement between Sonoma Water and Graton CSD for transferring of trucking operations to the Graton CSD and treatment and disposal of Occidental CSD's average daily dry weather wastewater flows. The average daily dry weather flows that would be transported and treated is 17,000 gallons per day. The agreement would include Sonoma Water providing as-needed services during the operational agreement term, including training of Graton CSD staff on hauling and transferring procedures.

#### Wastewater Transport

The project would include transport of wastewater from the Occidental CSD to the Graton CSD for treatment, storage, and disposal. The proposed transport route is shown on Figure 3 (Proposed Wastewater Transportation Routes). Wastewater transport currently occurs along Highway 116 under existing conditions, as transport trucks travel from the Occidental CSD through the Highway 116 and Green Valley Road intersection in route to the ALWSZ wastewater treatment facility. The

proposed project would not increase the number of haul trucks comparative to existing conditions.

Transport trucks would be filled with wastewater at the Occidental CSD Lift Station. A truck would travel south on Occidental-Camp Meeker Road to Graton Road, then east on Graton Road to Ross Road, north on Ross Road to Green Valley Road, and finally east on Green Valley Road to the project site. Return trips would travel east on Green Valley Road to Highway 116, then right onto Mueller Road, and right onto Graton Road.

The proposed transport route would be approximately 7 miles in length for a one-way trip. Under existing conditions, transport trucks currently travel approximately 18 vehicle miles for a one-way trip to the ALWSZ wastewater treatment facility. Reducing one-way haul trip lengths from 18 miles to 7 miles would reduce mobile source air emissions associated with transport by more than 50 percent.

The transport trucks to be utilized would be 4-axle trucks with a 4,200-gallon vacuum tank and 500 cubic feet per minute pumping system with pressure relief valves. The trucks would be 30 feet in length and approximately 15,914 pounds. The trucks would have 2017 EPA emission engines and back up alarms. The process of transferring wastewater from a transport truck to the proposed Graton CSD receiving station would require approximately 10 to 15 minutes per truck. During this time, a truck may potentially idle for approximately 5 minutes in order to pump wastewater under pressure. Otherwise, the truck engine would be turned off during the transfer process.

Transport of wastewater from the Occidental CSD to the proposed new Graton CSD receiving station would be scheduled to occur on a weekday (Monday through Friday) between 7 a.m. and 5 p.m. It is anticipated that transport to the proposed Graton CSD receiving station would occur approximately 3 to 5 days per week. On a day when wastewater transport occurs, approximately 5 to 10 trips would typically occur, however, there could be additional daily trips to reduce the number of transport days during a week, or during wet weather events. On average, 30 trips per week would occur during dry periods. Transport of wastewater to the proposed Graton CSD receiving station would not be scheduled on weekends or after 5 p.m. on a weekday.

When transport of wastewater is required outside of scheduled hours, or during peak wet weather periods when flows exceed Graton CSD's capacity to treat, wastewater would be transported to Sonoma Water's ALWSZ WWTF located near the Town of Windsor. During an average rainy season and year, it is anticipated that hauling to the ALWSZ WWTF would be required on less than 30 days of the year. Such days would typically occur when daily average inflow to the Graton CSD WWTP is greater than 200-300 gallons per minute (gpm).

The existing wastewater transportation route from the Occidental CSD to the ALWSZ is approximately 18 miles for a one-way trip. Therefore, once completed, the project would reduce one-way trip lengths by 11 miles compared to baseline conditions.

### Operation and Maintenance of Graton CSD WWTP

The Graton CSD operates in accordance with Waste Discharge Requirements and NPDES Permit No. CA0023639 established by Order No. R1-2018-0001 and currently treats wastewater to Title 22 disinfected tertiary recycled water standards as its primary treatment mode. During the wet season (October 1 through May 14), the Graton CSD discharges treated effluent to Atascadero Creek at rates not exceeding one percent of the creek flow. During the dry season (May 15 through September 30), the recycled water is used for agricultural irrigation whenever possible or disposed of by irrigation on a 21-acre Graton CSD-owned parcel.

The proposed project would include a 10-year agreement between Sonoma Water and Graton CSD for transferring of trucking operations to the Graton CSD and treatment and disposal of Occidental

CSD's average dry weather wastewater flows (ADFW). The ADFW that would be transported and treated is 17,000 gallons per day (gpd). Graton CSD's treatment facilities are designed to treat 140,000 gpd. In comparison, Graton CSD's ADWF for 2019 and 2020 was 86,000 gpd. The 54,000 gpd of ADWF unused capacity is sufficient for accommodating Occidental CSD's ADWF and for growth in Graton in terms of the District annual limit of 12 equivalent single-family dwelling units allowed per calendar year.

The project would not require any modifications to Graton CSD's wastewater treatment facilities. Routine operation and maintenance of the treatment, storage, and disposal facilities at Graton CSD's wastewater treatment, reclamation, and disposal facility would remain similar to current levels. Routine operation and maintenance of the new Graton CSD receiving station would occur on an annual or as needed basis. Vehicles utilized for the transport of wastewater would be staged and maintained at the Graton CSD WWTP when not in use. The project is anticipated to create the equivalent of up to 1 new full-time Graton CSD employment opportunity for a truck driver.

#### Operations and Maintenance of Occidental CSD Lift Station and Former WWTP

Operational activities would include the continued collection and storage of untreated wastewater at the Occidental CSD Lift Station and former wastewater treatment facility, including aeration at the former wastewater treatment facility to prevent odors. The existing Occidental CSD Lift Station would continue to function as a collection and short-term storage system and would have operations and maintenance activities similar to existing activities. Sonoma Water would continue to perform operation and maintenance activities at these facilities.

Maintenance activities would include continued routine maintenance of the plumbing and electrical systems associated with the collection and storage facilities. Maintenance would also include routine management and maintenance of the plumbing and electrical systems associated with the truck filling and receiving activities.

### 2.3.3 Project Construction

#### Construction Schedule

Construction of the project is expected to begin in Summer or Fall of 2021 and require approximately 3 months to complete. Construction activities would generally occur between 7:00 a.m. and 5:00 p.m. on weekdays.

#### Construction Staging and Equipment

Prior to construction, the contractor would mobilize resources to a staging area that would be located adjacent to Green Valley Road or Hicks Road (See Figure 2, Proposed GCSD Improvements). A variety of construction equipment would be used to build the project, including a backhoe, mini-excavator/excavator, dump truck(s), sweeper, saw cutter, concrete truck, a 20-yard asphalt end dump truck, and stump grinder, and power hand tools including a pavement saw and jack hammer.

Site preparation would require the removal and off-haul of materials. This would include, but not necessarily be limited to, vegetation, concrete, asphalt and fill. The proposed new 6-inch diameter sewer lateral connection within Green Valley Road would be installed using conventional open-trench methods. Open-trench methods would include excavating a trench, preparing and installing the lateral pipeline components, backfilling the trench with non-expansive fills, and restoring and re-paving the pipeline alignment.

The primary construction-related vehicle and haul truck route to the project site is anticipated to be Highway 116 to Green Valley Road. The number of construction-related vehicles traveling to and from the project areas would vary on a daily basis. It is anticipated that up to 8 haul truck trips could occur during peak construction periods. In addition, it is anticipated that construction crew trips would require up to 8 vehicle trips per day.

Construction activities would not require temporary or long-term closure of existing driveways to adjacent single-family residences, and would not close Green Valley Road or adjacent driveways in a manner that would impair emergency access or response timing of first responders.

### Construction Traffic Control

Construction activities would take place within a County of Sonoma right-of-way, requiring an encroachment permit and potentially a partial lane closure during construction hours. As part of the encroachment permit process, Graton CSD and its construction contractor would be required to prepare traffic control plans for review and acceptance of planned work within the County right-of-way. This would include information on the lengths and widths of work zones, tapers and sign spacing, and all lanes to be used, reduced, or left open. The development and implementation of traffic control plans may also include, but not necessarily be limited to:

- Traffic controls, signs, and flaggers required for conformance with the current California Manual of Uniform Traffic Control Devices;
- Pedestrian and bicycle control devices;
- Notifications/arrangements for any driveway access restrictions;
- Notifications to emergency responders and public transit agencies;
- Scheduling of major lane closures during off-peak hours; and
- Detour routes, if needed.

### Groundwater Dewatering (If Required)

If needed, temporary groundwater dewatering would be conducted to provide a dry work area during construction-related excavations. Dewatering would involve pumping water out of a trench into a Baker tank (or other similar type of settling tank). Following the settling process provided by a tank, groundwater would typically be pumped to a bag and cartridge filter system (or similar system) before being discharged to the sanitary sewer system.

## 2.4 Required Agency Approvals

The following discretionary actions and other approvals from the Graton CSD may be required for the project:

- Sonoma Water Agreement: The proposed project would include a 10-year agreement between Graton CSD and Sonoma Water for transferring of trucking operations and treatment and disposal of Occidental's CSD's wastewater.

Table 2-1 lists other regulatory agencies that may have permitting or approval authority over certain aspects of the project.

**Table 2-1 Required Permits and Authorizations**

| Agency | Requirement | Trigger |
|---|---|---|
| Sonoma Water | 10-year Agreement for Transfer of Trucking Operations | Operating agreement with Graton CSD |
| County of Sonoma | Encroachment Permit | Improvements made within a County right-of-way along Green Valley Road |

## 2.5 Tribal Consultation

Graton CSD has not received requests for notification of proposed projects from California Native American tribes pursuant to Public Resources Code Section 21080.3.1. Graton CSD nevertheless initiated contact with Native American tribes as part of preparing the 2019 IS/MND, and the modified project is located within the project area that was previously evaluated and discussed with California Native American tribes. See Section 4.18, Tribal Cultural Resources, for additional information.

# 3. Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages. Where checked below, the topic with a potentially significant impact will be addressed in an environmental impact report:

| | | |
|---|---|---|
| ☐ Aesthetics | ☐ Greenhouse Gas Emissions | ☐ Public Services |
| ☐ Agricultural & Forestry Resources | ☐ Hazards & Hazardous Materials | ☐ Recreation |
| ☐ Air Quality | ☐ Hydrology/Water Quality | ☐ Transportation |
| ☐ Energy | ☐ Land Use/Planning | ☐ Tribal Cultural Resources |
| ☐ Biological Resources | ☐ Mineral Resources | ☐ Utilities/Service Systems |
| ☐ Cultural Resources | ☐ Noise | ☐ Wildfire |
| ☐ Geology/Soils | ☐ Population/Housing | ☐ Mandatory Findings of Significance |

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

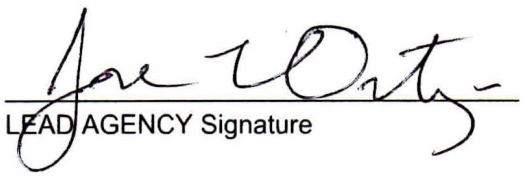
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION would be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there would not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION would be prepared.

☐ I find that the proposed MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect: (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect: (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



LEAD AGENCY Signature

3/8/2021

Date

# 4. Environmental Analysis

## 4.1 Aesthetics

| | Potentially Significant Impact | Less-than-Significant with Mitigation Incorporated | Less-than-Significant Impact | No Impact |
|---|---|---|---|---|
| Except as provided in Public Resources Code Section 21099, would the project: | | | | |
| a) Have a substantial adverse effect on a scenic vista? | | | | ✓ |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | | | ✓ | |
| c) In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surroundings? | | | ✓ | |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | | | | ✓ |

**a) Have a substantial adverse effect on a scenic vista? (No Impact)**

The Sonoma County General Plan does not explicitly identify scenic vistas (Sonoma County 2008). The proposed aboveground project improvements would be approximately 70-feet in length and would be located along the south side of Green Valley Road, west of Highway 116 - a designated scenic corridor (see response to item c below). The aboveground improvements that would be constructed as part of the project would be limited to an approximately 1,400-square-foot concrete driveway pullout and a 6-foot-tall and 6-foot-wide aboveground control box. Such improvements would not be visible from a designated scenic vista, therefore, no impact would result.

**b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (Less than Significant)**

Highway 116 (Gravenstein Highway) in the project vicinity is an officially designated State scenic highway. The *Sonoma 116 Scenic Highway Corridor Study* identifies several contributing elements to the scenic quality of Highway 116, including stands of trees, the Russian River and its associated vegetation, varied and undulating terrain, and small-scale man-made structures (Caltrans 1988). The project site is located approximately 250 west of Highway 116, just west of Hicks Road.

The proposed improvements would be set back approximately 250 feet from Highway 116 and would not be out of character with the design and appearance of the existing Green Valley Road setting. No trees, rock outcroppings, or historic buildings along the Highway 116 corridor would be removed or altered for the project. No placement of new signs or sub re-grading along Highway 116 would occur. Existing views of the project site from Highway 116 would not substantially change. The impact would be less than significant.

**c) In non-urbanized areas, substantially degrade the 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? (Less than Significant)**

Utilizing the Sonoma County Permit and Resource Management Department (PRMD) *Visual Assessment Guidelines*, the site sensitivity of the project site would be high, which is a category applied to sites with land use or zoning designation protecting scenic or natural resources, such as General Plan designated scenic landscape units and scenic corridors. Green Valley Road west of Highway 116 is a designated scenic corridor. Green Valley Road is also adjacent to a designated scenic landscape unit north of the roadway.

The project site includes roadside adjacent lands with ruderal grasses, an overhead electrical pole, and a Sonoma County Transit bus stop. Further south is private wooden fencing associated with single family residences. To the north side of Green Valley Road is a drainage feature located between the paved section of Green Valley Road and an adjacent single-family residence with a wooden property fence.

The proposed aboveground improvements would include a new 20-foot wide and 70-foot long concrete driveway pullout along the south side of Green Valley Road, which would be accessed by transport trucks heading eastbound on Green Valley Road. An aboveground control box housing electrical controls and plumbing connections would measure approximately six feet in height, six feet in width, and approximately two feet in depth (see Figure 2).

Construction activities would result in temporary changes in the visual character of the immediate project area for approximately 3 months. Construction activities would include the presence of construction equipment, trucks, staging and laydown areas, and associated fugitive dust adjacent to the Highway 116 corridor. However, given the temporary nature and short duration (3 months) of project construction activities, the impact of such activities would be less than significant.

Following construction, the project improvements would be minimally visible from public views, limited to views from Green Valley Road and Hicks Road in the immediate project area. The project site is not located on a ridgeline, and there are no adjacent public use areas or pedestrian sidewalk facilities near the project site. The proposed improvements would be located at grade with Green Valley Road and immediately adjacent to the paved roadway. In this way, the project elements would generally repeat the shape, geometry and orientation of existing Green Valley Road. The project would not result in new night lighting in the project area. Overall, the project contrasts would be weak. Utilizing the Sonoma County PRMD Visual Assessment Guidelines, the visual dominance of the project would be subordinate. Therefore, the project would have a less than significant impact on the existing visual character and quality of public views of the site and its surroundings.

**d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (No Impact)**

Nighttime construction would not be required for the project. Therefore, no nighttime exterior lighting would be required during construction. The existing project area is currently lighted through existing street lights on Green Valley Road near Hicks Road. The proposed project does not propose any new additional lighting. No impact would result.

## 4.2 Agricultural and Forestry Resources

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

**a-e) Convert farmland or forest land? (No Impact)**

The project would not be located on lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide importance (CDC, 2018), or on land under a Williamson Act contract (County of Sonoma, 2018). The project would not be constructed on land zoned for agricultural or forestland uses. Thus, the project would not convert Important Farmland, land under a Williamson Act contract, or forest land to other uses, nor conflict with zoning for agricultural or forestry uses. No impact to agriculture or forestry resources would result.

## 4.3 Air Quality

| | Potentially Significant Impact | Less-Than-Significant With Mitigation Incorporation | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project: | | | | |
| a) Conflict with or obstruct implementation of the applicable air quality plan? | | | | ✓ |
| b) Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? | | | ✓ | |
| c) Expose sensitive receptors to substantial pollutant concentrations? | | | ✓ | |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | | | ✓ | |

**a) Conflict with or obstruct implementation of the applicable air quality plan? (No Impact)**

The project site and a portion of the proposed wastewater transportation route are located within the North Coast Air Basin and within the jurisdiction of the Northern Sonoma County Air Pollution Control District (NSCAPCD). The North Coast Air Basin is in attainment for all criteria air pollutants, and no applicable air quality plan exists for the project area (Personal Communication, NSCAPCD 2019).

An approximately 4-mile segment of the wastewater transportation route between the Occidental CSD Lift Station and the proposed Graton CSD receiving station would be within the San Francisco Bay Area Air Basin and within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). Under California standards, the San Francisco Bay Area Air Basin is currently designated as a nonattainment area for particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), particulate matter 10 microns or less in diameter ($PM_{10}$), and ozone. Under national standards, the San Francisco Bay Area Air Basin is currently designated as nonattainment for $PM_{2.5}$ and 8-hour ozone. The Air Basin is in attainment (or unclassified) for all other air pollutants. (BAAQMD 2020)

The BAAQMD's 2017 Clean Air Plan (BAAQMD 2017a) is the applicable air quality plan for the San Francisco Bay Area Air Basin. The 2017 Clean Air Plan contains 85 individual control measures in nine economic sectors: stationary (industrial) sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Many of these control measures require action on the part of the BAAQMD, the California Air Resources Board (CARB), or local communities, and are not directly related to the actions undertaken for an individual development project. The project would not prevent the BAAQMD from implementing these actions and none apply directly to the project. As a result, the project would not conflict with or obstruct implementation of the 2017 Clean Air Plan. No impact would result.

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

The project site and a portion of the proposed wastewater transportation route is located in an area that is in attainment for all criteria air pollutants. By its nature, air pollution is largely a cumulative impact, in that individual projects are rarely sufficient in size to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions may contribute to cumulative adverse air quality impacts.

Construction activities are anticipated to take approximately 3 months to complete. The types of air pollutants generated by construction activities are typically nitrogen oxides and particulate matter, such as dust and exhaust. Construction activities could temporarily increase levels of $PM_{2.5}$ and $PM_{10}$ downwind of construction activity. These are temporary emissions that vary considerably from day-to-day and by the type of equipment and weather. In addition, CO and reactive organic gases are emitted during operation of gas and diesel-powered construction-equipment.

Construction-related air pollutant emissions were estimated for the project using the California Emissions Estimator Model (CalEEMod). The results were then compared to the NSCAPCD and BAAQMD thresholds of significance for criteria pollutants. As shown in Table 4.3-1 (Construction Air Emissions Associated with Project), the estimated construction-related emissions are less than the thresholds of significance adopted by the NSCAPCD and the BAAQMD. Therefore, the impact from construction related emissions would be less than significant.

**Table 4.3-1 Construction Air Emissions Associated with Project**

| Project Construction Emissions | CO | $NO_x$ / VOCs | $PM_{10}$ | $PM_{2.5}$ |
|---|---|---|---|---|
| 2021 Construction Emissions | 0.26 tons/yr | 0.27 tons/yr<br>*13.27 lbs/day* | 0.05 tons/yr<br>*0.61 lbs/day* | 0.03 tons/yr<br>*0.57 lbs/day* |
| *NSCAPCD Thresholds* | *100 tons/yr* | *40 tons/yr* | *15 tons/yr* | *10 tons/yr* |
| *BAAQMD Thresholds* | *NA* | *54 lbs/day* | *82 lbs/day* | *54 lbs/day* |

Following construction, the project would not result in new stationary sources of criteria air pollutants. Trucks transporting wastewater from the Occidental CSD to the proposed Graton CSD receiving station would travel approximately 7 vehicle miles for a one-way trip. Under existing conditions, trucks transporting wastewater from the Occidental CSD to the ALWSZ WWTF travel approximately 18 vehicle miles for a one-way trip. Reducing haul trip lengths from 18 miles to 7 miles would reduce

mobile source air emissions by more than 50 percent, resulting in a beneficial air qualify effect. No operational impact would result.

**c) Expose sensitive receptors to substantial pollutant concentrations? (Less than Significant)**

Sensitive receptors are members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. No schools, hospitals, child care centers, or other similar facilities are located adjacent to the project site. The nearest schools, Oak Grove Elementary and Acorn Preschool, are located approximately 0.9 mile to the south of the project site. The nearest sensitive receptor to the project site is a single family residence located approximately 175 feet to the southwest. The Blue Spruce Lodge mobile home community, which includes senior housing for residents 55 and older, is located approximately 500 feet to the east of the project site at its nearest point.

### Construction

Air quality modeling was conducted for the project, which included consideration of fugitive dust and emissions from heavy machinery that would occur during construction. The results were then compared to the Air Quality District thresholds of significance for criteria pollutants. As summarized in Impact "b" above, the estimated construction-related fugitive dust and other emission types were well below the thresholds of significance adopted by the local Air Quality Districts. As required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]), construction contractors would be required to minimize idling times for trucks and equipment to five minutes, as well as ensuring that construction equipment is maintained in accordance with manufacturer's specifications. Given the short construction period (3 months), prolonged exposure of sensitive receptors to substantial pollutant concentrations would not occur. Therefore, the impact of construction-related emissions on sensitive receptors would be less than significant.

### Operation

The CARB has made the reduction of the public's exposure to diesel particulate matter (DPM) one of its highest priorities, with an aggressive plan to require cleaner diesel fuel and cleaner diesel engines and vehicles. CARB has implemented an On-Road Heavy-Duty Vehicle Program, which includes Title 13, Section 2485 that applies to diesel-fueled commercial motor vehicles. CARB regulations of diesel engines and fuels have had a dramatic effect on DPM concentrations, decreasing statewide ambient DPM levels by 68 percent since 1990.

Potential for health risk from DPM is a complex interaction of pollutant type, concentration, exposure pathways, and exposure duration. CARB's *Air Quality and Land Use Handbook - A Community Health Perspective* includes recommended separation distances for various land uses that are based on relatively conservative estimations of emissions based on source-specific information. For example, a separation distance of 500 feet from rural roads with 50,000 vehicles/day is recommended. Comparatively, in 2017, the average daily traffic recorded along Green Valley Road in the project vicinity was 3,477 vehicles/day (less than 7 percent of the 50,000 vehicles/day designation). On a day when wastewater transport would occur, approximately 5 to 10 trips would typically occur along Green Valley Road, and on average, 30 trips per week would occur during dry periods. The proposed number of trips would not substantially increase the vehicles/day along Green Valley Road.

The transport trucks to be utilized would be 4-axle trucks, with 2017 EPA emission engines. Under existing conditions, transport trucks currently travel approximately 18 vehicle miles for a one-way trip

from Occidental to the Airport-Larkfield-Wikiup Sanitation Zone wastewater treatment facility. Under the proposed project, transport trucks would travel approximately 7 vehicle miles from Occidental to the proposed receiving station site. Reducing haul trip lengths from 18 miles to 7 miles would reduce overall mobile source air emissions by more than 50 percent compared to baseline emissions, resulting in a beneficial air qualify effect. The project would require periodic idling of transport vehicles at the proposed receiving station site. However, idling of vehicles during the wastewater transfer process would be non-continuous, occurring in approximately 5-minute increments 3 to 5 days per week. The project would not result in a new stationary source of criteria air pollutants. The operational impact on sensitive receptors to substantial pollutant concentrations would be less than significant.

**d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (Less than Significant)**

The process of transferring wastewater would include connecting the truck to the proposed receiving station with hoses and sealed control valves through a closed system directly to an underground sewer main. Wastewater would not be exposed to open air during the transfer process. Graton CSD would require drivers to be fully trained on operation of the transport trucks and the proposed receiving station. Standard operating procedures to eliminate the potential for leakage during the transfer process would be required, including full drainage of connecting hoses prior to disconnection. Trucks would pull into the proposed driveway and connect to the proposed receiving station control valves. The closed system would prevent odors from emanating from the transfer process and the collection system. The receiving station would include concrete curbing, drainage, and a potable water connection to ensure that any accidental spills would be discharged to the wastewater collection system. Therefore, the impact related to odor emissions would be less than significant.

## 4.4 Biological Resources

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

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

An evaluation of the existing biological setting on and near the project site was conducted to determine the potential for any special-status plants or animal species to occur. A reconnaissance-

level site visit was also conducted by a qualified biologist to evaluate on-site and adjacent habitat types. Information on special-status species was compiled through a review of the literature and database searches. The following sources were reviewed to determine which special-status plant and wildlife species have been documented in the vicinity of the project site:

- California Department of Fish and Wildlife Natural Diversity Database (CNDDB)
- California Native Plant Society (CNPS) Rare and Endangered Plant Inventory
- United States Fish and Wildlife (USFWS) Information for Planning and Conservation (IPaC)

The project would include improvements to an approximately 1,400 sf portion of previously disturbed and developed lands within and adjacent to Green Valley Road, and a new sewer main lateral connection within an existing asphalted section of Green Valley Road. The improvements would occur within the County of Sonoma's road right-of-way for Green Valley Road, within the shoulder of the roadway which includes roadside adjacent lands with ruderal grasses, an overhead electrical pole, and a Sonoma County Transit bus stop. Ruderal non-native grassland occurs along the southern shoulder of Green Valley Road that are part of the project study area. These areas are dominated by weedy herbaceous species and non-native grasses.

Two plant species, golden larkspur (*Delphinium luteum*) and Pitkin marsh lily (*Lilium pardalinum ssp. Pitkinense*), are shown in CNDDB records as having the potential to occur within the project vicinity. Both golden larkspur and Pitkin marsh lily are endangered (Rank 1B.1) plant species. Habitat requirements for golden larkspur includes chaparral, coastal prairie, coastal scrub, and north-facing rocky slopes. Habitat requirements for Pitkin marsh lily include cismontane woodland, freshwater marsh, meadows and seeps, and marshes and swamps. No special-status plant species were identified on the project site. The grasses within the project site appear to be mowed as part of annual roadway maintenance, and the potential for special-status plant species to occur within the project area is considered low because habitat in the project area is absent or marginal for these species. Therefore, based on literature review, habitat disturbance, and on-site survey observations, no impact to special-status plants would result from implementation of the project.

No occurrences of special-status wildlife species have been recorded on the project site, and none were identified during a site reconnaissance. The project would not require the removal of trees that would support nesting or roosting habitat for passerines, raptors, or bats. The project site is mapped as a noise impacted segment in Sonoma County (Sonoma County 2012), and estimated construction noise levels in the project area would be temporary and moderate and not expected to substantially effect potential nesting in off-site trees. However, if nesting passerines or raptors or roosting special-status bats were present in surrounding trees, then construction activities would have the potential to impact the species. The impact is considered significant.

### Mitigation

With implementation of Mitigation Measures BIO-1, the potential impact to nesting birds would be reduced to a less-than-significant level by locating any potential active nests before the start of construction and establishing buffers and avoiding nests, if found, during construction

#### Mitigation Measure BIO-1: Avoid Impacts to Nesting Birds

To the extent possible, Graton CSD shall require its contractors to conduct grading or removal of any vegetation outside the nesting season. The nesting season occurs between approximately February 1 and August 31. No preconstruction nesting bird survey is required for work conducted outside this period. If grading or vegetation removal between

August 31 and February 1 is infeasible and work must occur within the nesting season, Graton CSD shall require performance of a pre-construction nesting bird (both passerine and raptor) survey of the landscaped areas and trees by a qualified biologist within 7 days of ground breaking. If no nesting birds are observed, no further action is required and work shall occur within one week of the survey to prevent impacts to individual birds that could begin nesting after the survey. If bird nests (either passerine and/or raptor) are observed during the pre-construction survey, Graton CSD shall require a disturbance-free buffer zone be established around the nest tree(s) until the young have fledged, as determined by a qualified biologist.

**b,c) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service, including wetlands? (No Impact)**

The project site is comprised of roadside adjacent lands with ruderal grasses, an overhead electrical pole, and a Sonoma County Transit bus stop. An existing belowground storm drain conveys storm water to a roadside drainage ditch west of the proposed receiving station. Ruderal non-native grassland occurs along the southern shoulder of Green Valley Road that are part of the project site. These areas are dominated by weedy herbaceous species and non-native grasses.

The U. S. Army Corps of Engineers (USACE) issued the new Navigable Waters Protection Rule published in the Federal Register on April 21, 2020. Part 328 and Part 120 defines jurisdictional waters as being the territorial seas, tributaries, lands and ponds and impoundments of jurisdictional waters and adjacent wetlands. Non-jurisdictional waters include ditches that are not waters as identified under the jurisdictional waters definition and are not wetlands.

The project site does not include riparian habitat or other sensitive natural communities, such as grasslands or wetlands (including marsh or vernal pools). An ephemeral roadside ditch is located along the north side of Green Valley Road which has an eventual downstream hydrologic connection to Atascadero Creek, located approximately 0.5 mile to the west of the project area. However, the project would not result in any impact to the roadside drainage on the north side of Green Valley Road. No impact would result.

**d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (No Impact)**

The project site does not include waterways or other sensitive natural communities that provide wildlife movement corridors. The project site and general vicinity does not provide high quality wildlife habitat and is limited to rural residential neighborhoods and wineries. Above-ground physical changes to the project area would be minimal and limited to the proposed wastewater receiving station. Given the location of the project and its small footprint, the project would not interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or nursery sites. No impact would result.

**e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (No Impact)**

The *Sonoma County General Plan 2020* includes goals to protect and enhance the County's natural habitats and diverse plant and animal communities (Goal OSRC-7), and to protect and enhance riparian corridors and functions (Goal OSRC-8). The project site is not located within a resource protection zone as defined by the Sonoma County General Plan, or an area designated as a protected area by the Riparian Corridor Ordinance. Additionally, the project would not remove trees that are protected by the Tree Protection Ordinance listed in the Sonoma County Code (Chapter 26, Article 88 Sec. 26-08-010). Therefore, the project would not conflict with local policies or ordinances. No impact would result.

**f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (No Impact)**

The project site is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As such, the project would not conflict with the provisions of an adopted habitat conservation plan. No impact would result.

## 4.5 Cultural Resources

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

An *Archaeological Resources Study* was prepared for the project by the Sonoma State University Anthropological Studies Center (ASC 2019). The study assessed the potential for surficial and/or buried archaeological resources in the proposed improvement area through the completion of the following:

- Records and literature search at the Northwest Information Center (NWIC) of the California Historical Resources Information Center (CHRIS);
- Further literature review of publications, files, and maps for ethnographic, historic-era, and prehistoric resources and background information;
- Communication with the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File and contact information for the appropriate tribal communities;
- Contact with the appropriate local Native American Tribes; and
- Pedestrian archaeological survey of the project area.

Since completion of the 2019 Archaeological Resources Study, the proposed location of the wastewater receiving station was modified. However, the new proposed location of the receiving station south of Green Valley Road remains within the overall project area that was previously evaluated in the 2019 Archaeological Resources Study, including the area in which an archaeological pedestrian survey was conducted. The study results are used as a technical basis for evaluating potential impacts to historic and cultural resources under CEQA.

**a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (No Impact)**

The project would include improvements to an approximately 1,400 sf portion of previously disturbed and developed lands within and adjacent to Green Valley Road, and a new sewer main lateral connection within an existing asphalted section of Green Valley Road. There are no listed historical resources, including historic properties, present within the project area (ASC 2019), and the existing property and surrounding properties would not meet any of the context types required for establishment of historic significance. No impact would result.

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? (Less than Significant with Mitigation)**

The *Archaeological Resources Study* conducted for the project found no previously recorded cultural resources located within the proposed improvement area. A pedestrian archaeological survey of the project site also identified no archaeological resources. Two cultural resources studies have previously been conducted over the majority of the project area, and no cultural resources were recorded within one-quarter mile. The study concluded that the sensitivity of the overall project area for buried archaeological resources is low (ASC 2019). Although no known archaeological resources were identified within the project area, the potential exists for encountering previously undiscovered archaeological resources during project construction. Therefore, the impact is considered potentially significant.

### Mitigation

Implementation of Mitigation Measure CR-1 would reduce the potential impact to previously undiscovered archaeological resources by outlining procedures to be taken in the event of inadvertent discovery.

**Mitigation Measure CR-1: Minimize Impacts to Unknown Archaeological Resources**

In the event that any subsurface archaeological features or deposits, including locally darkened midden soil, are discovered during construction-related earth-moving activities, Graton CSD shall ensure that all ground-disturbing activity in the vicinity of the resource shall be halted, that a qualified professional archaeologist is retained to evaluate the find, and the appropriate tribal representative(s) are notified. If the find qualifies as a historical resource or unique archaeological resource as defined by CEQA, Graton CSD and a qualified archaeologist shall develop appropriate measures to protect the integrity of the resource and ensure that no additional resources are affected. In considering any suggested measures proposed by the consulting archaeologist in order to mitigate impacts to historical resources or unique archaeological resources, the Graton CSD shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project while mitigation for unique archaeological resources is being carried out.

**c) Disturb any human remains, including those interred outside of formal cemeteries? (Less than Significant with Mitigation)**

No human remains are known to exist within the project area. However, there is potential for earthwork and grading to result in the disturbance of previously unrecorded human remains, if present. Therefore, the impact is considered potentially significant.

### Mitigation

Implementation of Mitigation Measure CR-2 would reduce the potential impact by outlining procedures to be taken in the event of inadvertent discovery of human remains.

### Mitigation Measure CR-2: Protect Human Remains if Encountered

If human remains, associated grave goods, or items of cultural patrimony are encountered during construction, Graton CSD shall ensure that all work is halted in the vicinity of the find and the County Coroner shall be notified immediately. The following procedures shall be followed as required by Public Resources Code § 5097.9 and Health and Safety Code § 7050.5. If the human remains are determined to be of Native American origin, the Coroner shall notify the Native American Heritage Commission within 24 hours of the determination. The Native American Heritage Commission shall then notify the Most Likely Descendant (MLD), who has 48 hours to make recommendations to the landowner for the disposition of the remains. A qualified archaeologist, the Graton CSD and the MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of any human remains and associated or unassociated funerary objects. The agreement would take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, and final disposition of the human remains and associated or unassociated funerary objects.

## 4.6 Energy

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

**a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Less than Significant)**

Construction of the project would involve grading, excavation and use of heavy machinery as discussed under Section 4.3 (Air Quality). Construction would require the use of fuels, primarily gas, diesel, and motor oil. The precise amount of construction-related energy consumption that would occur is uncertain. However, construction would not require a large amount of fuel or energy usage because of the moderate number of construction vehicles and equipment, worker trips, and truck trips that would be required for a project of this scale. Construction equipment would remain staged in the project area once mobilized. Use of fuels would not be wasteful or unnecessary because their use is necessary to complete the project. Excessive idling and other inefficient site operations would be prohibited. Equipment idling times would be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes or less (as required by the California airborne toxics control measure (Title 13, Section 2485 of the CCR). Therefore, construction would not result in the use of large amounts of fuel and energy in a wasteful manner, and the impact would be less than significant.

Following construction, trucks transporting wastewater from the Occidental CSD to the proposed Graton CSD receiving station would travel approximately 7 vehicle miles for a one-way trip. Under existing conditions, trucks transporting wastewater from the Occidental CSD to the ALWSZ WWTF travel approximately 18 vehicle miles for a one-way trip. Reducing haul trip lengths from 18 miles to 7 miles would result in substantial long-term operational energy savings. The energy required to treat Occidental's wastewater at the Graton CSD WWTP would be offset by the reduction in energy at the ALWSZ WWTP. Therefore, the project would result in a net reduction in energy consumption. No operational impact would result.

**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (No Impact)**

In 2003, the California Energy Commission (CEC), the California Power Authority (CPA), and the California Public Utilities Commission (CPUC) jointly adopted an Energy Action Plan (EAP) that listed goals for California's energy future and set forth a commitment to achieve these goals through specific

actions (CEC 2003). In 2005, the CPUC and the CEC jointly prepared the EAP II to identify the further actions necessary to meet California's future energy needs. Additionally, the CEC prepared the State Alternative Fuels Plan in partnership with the California Air Resources Board and in consultation with the other state, federal, and local agencies. The alternative fuels plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production (CEC 2007).

Locally, the *Sonoma County 2020 General Plan* includes goals to promote energy conservation in the County (Goal OSRC-14) and to increase use of renewable energy resources (OSRC-15).

Construction and operation of the project would not conflict with or obstruct implementation of either the EAP, EAP II, the State Alternative Fuels Plan or local County general plan goals. Project construction would not require a large amount of fuel or energy usage because of the limited extent and nature of the proposed improvements and the minimal number of construction vehicles and equipment, worker trips, and truck trips that would be required for a project of this small scale. Project operation would result in a net reduction in energy consumption by substantially reducing existing vehicle miles travelled for wastewater transportation. No conflicts with a state or local plan for renewable energy or energy efficiency have been identified. Therefore, no impact would result.

## 4.7 Geology and Soils

| | Potentially Significant Impact | Less-than-Significant with Mitigation Incorporated | Less-than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42? | | | | ✓ |
| ii) Strong seismic ground shaking? | | | ✓ | |
| iii) Seismic-related ground failure, including liquefaction? | | | ✓ | |
| iv) Landslides? | | | | ✓ |
| b) Result in substantial soil erosion or the loss of topsoil? | | | ✓ | |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on, or off, site landslide, lateral spreading, subsidence, liquefaction or collapse? | | | ✓ | |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? | | | ✓ | |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | | | | ✓ |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | | ✓ | | |

**a, i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. (No Impact)**

The project site is not located within a designated Alquist-Priolo Earthquake Fault Zone or near a known active fault. The nearest active fault is the Rodgers Creek Fault located approximately eight miles west of the site (ABAG 2019). The project would not change the exposure of people of structures to risk of loss, injury, or death from fault rupture. Thus, no impact would result.

**a, ii) Strong seismic ground shaking? (Less than Significant)**

The project site is expected to experience strong seismic groundshaking over the life of the project, with strong shaking (Modified Mercalli Intensity 7) predicted at the site if a large earthquake occurs along the Berryessa, Maacama, or Rodgers Creek Faults, or the northern segments of the San Andreas Fault (ABAG 2019). The proposed project would not alter the seismic environment or affect the risk of seismically-induce groundshaking. Therefore, there would be no change regarding the exposure of people or structures to substantial adverse effects related to the risk of property loss, injury, or death due to seismically-induced groundshaking compared to existing conditions. If strong seismic groundshaking were to damage the proposed facilities, it is unlikely that human lives would be put at risk because the project does not involve the construction of habitable structures. The project would be constructed to the seismic standards of the most recent California Building Code, as applicable. Therefore, the impact to people and structures from strong seismic groundshaking would be less than significant.

**a.iii) Seismic related ground failure, including liquefaction? (Less than Significant)**

The project site and surrounding properties are located in an area mapped as having Very Low to Low Susceptibility to liquefaction (Permit Sonoma GIS 2019). The project would not alter the seismic environment or affect the risk of seismically-induced ground failure, including liquefaction. There would be no change regarding the exposure of people or structures related to the risk of property loss, injury, or death due to seismically-induced ground failure compared to existing conditions. Therefore, the impact related to seismic-related liquefaction would be less than significant.

**a.iv) Landslides? (No Impact)**

The proposed improvements would be located on relatively level, previously developed and/or paved land. The project site and surrounding properties are located in an area mapped as having few landslides (Permit Sonoma 2019). The project site is not located within a deep-seated landslide hazard area (Sonoma County 2008), or on a mapped landslide complex or debris flow source area (USGS 1997; USGS 1998). No impact would result.

**b) Result in substantial soil erosion or the loss of topsoil? (Less than Significant)**

Areas to be disturbed during construction would consist predominantly of underlying soils that have been altered from their original, natural state. As a result, the project would result in little disturbance to native soils.

The project includes grading, cuts, and fills that have the potential to cause erosion. Erosion and sediment control provisions of the County Construction Grading and Drainage Ordinance (Municipal

Code Chapter 11) and Storm Water Quality Ordinance (Municipal Code Chapter 11A) require submission of an Erosion and Sediment Control Plan and implementation of best management practices to reduce erosion. These mandatory ordinance requirements and adopted best management practices are designed to maintain potential water quantity impacts at a less than significant level during and post construction. Therefore, the potential soil erosion impact would be less than significant.

**c, d) Be located on a geologic unit or soil that is unstable or expansive? (Less than Significant)**

Based on results of a prior geotechnical field exploration (GHD 2019), subsurface materials within Green Valley Road generally consist of very loose to medium dense silty sand. The project would include the use of on-site soils or imported material that meets engineered fill specifications. The project would not otherwise alter the properties of the soils at the project site nor cause or worsen the risks associated with unstable or expansive soils. There would be no change regarding substantial risks to life or property due to expansive or corrosive soils compared to existing conditions. The impact would be less than significant.

**e) 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? (No Impact)**

No new septic tanks or alternative wastewater disposal systems requiring infiltration to soils would be constructed. No impact would result.

**f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Less than Significant with Mitigation)**

The proposed improvements would not require modification of any unique geologic features. Excavation and earthmoving activities would primarily occur within highly disturbed areas that are underlain by engineered soils and/or fill. Geologic materials underlying the project area are mapped as Miocene to Pleistocene aged marine rocks. Because project excavations would primarily occur in previously disturbed sites and soils, the sensitivity of the project area for buried paleontological resources is considered to be low. However, older alluvium has yielded vertebrate fossils in Sonoma County and throughout California. Therefore, although it is unlikely that project construction would impact paleontological resources, the potential exists for encountering previously undiscovered resources during project construction. The impact is considered potentially significant.

### Mitigation

Mitigation Measure GEO-1 would reduce the impact of construction activities on unknown paleontological resources to a less-than-significant level by addressing discovery of any unanticipated buried resources and preserving and/or recording those resources consistent with appropriate laws and requirements.

#### Mitigation Measure GEO-1: Protect Paleontological Resources during Construction

In the event that fossils are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), Graton CSD shall ensure that

construction activities are diverted away from the discovery within 50 feet of the find, and Graton CSD shall notify a professional paleontologist to document the discovery as needed, to evaluate the potential resource, and to assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the material, if it is determined that the find cannot be avoided. The paleontologist shall make recommendations for any necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permanent scientific institution where they will be properly curated and preserved.

## 4.8 Greenhouse Gas Emissions

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

**a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Less than Significant)**

No applicable standard or significance threshold has been established pertaining to construction-related greenhouse gas emissions. Therefore, this review uses a qualitative approach to construction emissions in accordance with Section 15064.4(a)(2) of the CEQA Guidelines. Project construction activities would result in a temporary increase in GHG emissions, including exhaust emissions from on-road trucks, worker commute vehicles, and off-road heavy-duty machinery. Construction would require clearing, earthmoving, and delivery equipment, as used for similar projects, and which have been accounted for in the State's emission inventory and reduction strategy for both on and off-road vehicles. Project construction activities are limited in scope and duration (3 months), and would not involve construction activities associated with higher-level greenhouse gas emissions such as use of a significant amount of heavy construction equipment, substantial earth-moving activities, or import/export of a substantial amount of material. Project construction activities would not impede the State in meeting the AB 32 greenhouse gas reduction goals. Therefore, impacts from the project's construction emissions would be less than significant.

Following construction, trucks transporting wastewater from the Occidental CSD to the proposed Graton CSD receiving station would travel approximately 7 vehicle miles for a one-way trip. Under existing conditions, trucks transporting wastewater from the Occidental CSD to the ALWSZ WWTF travel approximately 18 vehicle miles for a one-way trip. Therefore, the project would reduce haul one-way trip lengths from 18 miles to 7 miles, which would reduce long-term operational greenhouse gas emissions. The increased energy required to treat Occidental's wastewater at the Graton CSD WWTP would be offset by a reduction in energy at the ALWSZ WWTP. Therefore, the project would result in a net reduction in energy consumption and greenhouse gas emissions. No operational impact would result.

**b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (No Impact)**

This analysis uses the California Air Resources Board (CARB) *2017 Climate Change Scoping Plan* as the applicable greenhouse gas reduction strategy (CARB 2017). The Sonoma County Regional Climate Protection Authority's Climate Action Plan is not used as a qualified greenhouse gas reduction strategy for CEQA purposes due to a court settlement.

The 2017 Climate Change Scoping Plan provides strategies for meeting the mid-term 2030 greenhouse gas reduction target set by Senate Bill (SB) 32. The 2017 Climate Change Scoping Plan also identifies how the State can substantially advance toward the 2050 greenhouse gas reduction target of Executive Order S-3-05, which consists of reducing greenhouse gas emissions to 80 percent below 1990 levels. The recommendations cover several key sectors, including: energy and industry; transportation; natural and working lands; waste management; and water. The recommended measures in the 2017 Scoping Plan are broad policy and regulatory initiatives that will be implemented at the State level and do not relate to the construction and operation of individual projects. The project would not impede the State developing or implementing the greenhouse gas reduction measures identified in the Scoping Plan. Therefore, the project would not conflict with AB 32 or the 2017 Climate Change Scoping Plan. No impact would result.

The County's Climate Change Action Resolution (May 8, 2018) resolved to reduce GHG emissions by 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050 and noted twenty strategies for reducing GHG emissions, including increasing carbon sequestration, increasing renewable energy use, and reducing emissions from the consumption of good and services. Project operation would result in a net reduction in energy consumption by substantially reducing existing vehicle miles travelled for wastewater transportation. The project would not conflict with the County's Climate Change Action Resolution. No impact would result.

## 4.9 Hazards and Hazardous Materials

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

**a, b) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (Less than Significant)**

Small amounts of common hazardous materials such as fuel, solvents, and lubricants would be used during construction of the project. During construction activities, any on-site hazardous materials that may be used, stored, or transported would be required to follow standard protocols (as determined by the U.S. EPA, California Department of Health and Safety, and Sonoma County) for maintaining health and safety. Caltrans and the California Highway Patrol regulate the transportation of hazardous materials and wastes, including container types and packaging requirements, as well as licensing and training for truck operators, chemical handlers, and hazardous waste haulers. The California Division of Occupational Safety and Health (Cal-OSHA) also enforces hazard communication program regulations which contain worker safety training and hazard information requirements, such as procedures for identifying and labeling hazardous substances, communicating hazard information related to hazardous substances and their handling, and preparation of health and safety plans to protect workers and employees. Because the Graton CSD and its contractors would be required to comply with existing and future hazardous materials laws and regulations and applicable best management practices addressing the transport, storage, use, and disposal of hazardous materials, the potential to create a significant hazard to the public or the environment during construction of the project would be less than significant.

Following construction, operation of the project would include ongoing and regulator transport of wastewater, which would require fuel. Fueling and other haul truck vehicle maintenance that may require use of common hazardous materials (e.g. lubricants or oil) would not occur on site. The operational impact would be less than significant.

**c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (No Impact)**

Oak Grove Elementary and Acorn Preschool are the nearest schools to the proposed construction area, located approximately 0.9 mile to the south. The schools are also located approximately one-quarter mile south of Graton Road, which is currently utilized as the wastewater transportation route for transport of wastewater from Occidental CSD to the ALWSZ WWTP. The project would not result in a change in the number of transport trucks that would travel along Graton Road north of the schools. No impact would result.

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

The provisions in Government Code Section 65962.5 are commonly referred to as the "Cortese List." A search of the Cortese List search (CalEPA 2021) was completed to determine if any known hazardous waste sites have been recorded on or adjacent to the project construction area, including review of:

- Department of Toxic Substances Control EnviroStor database;
- List of Leaking Underground Storage Tank Sites from the Water Board GeoTracker database;
- List of solid waste disposal sites identified by the Water Board with waste constituents above hazardous waste levels;
- List of "active" Cease and Desist Orders and Cleanup and Abatement Orders from the Water Board;
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.

The project site is not included on any of the above-mentioned hazardous waste lists.

The site at 4115 North Gravenstein Highway on the east side of the intersection of Green Valley Road and North Gravenstein Highway is the current location of the Bridgeway Gas Station and is included on a list of active leaking underground storage tank (LUST) sites (Site No. T0609700188). The cleanup status is listed as open-remediation, with the potential contaminant of concern identified as gasoline. A review of the electronic submittals available on the State Geotracker database indicates that several underground storage tanks have been previously removed from the site in 1991 and 1998 (CalEPA 2019). Since 1993, monitoring and remediation wells have been installed and regularly monitored at the site. Remediation activities have included soil vapor extraction and ozone injection.

According to the *Fourth Quarter 2018 and First Quarter 2019 Groundwater Monitoring and Remediation Status Update Report* (Stratus 2019), depth to groundwater at the site ranged from 17.20 to 20.77 feet bgs in shallow screened wells and 19.26 to 22.59 feet bgs in deep screened wells. The groundwater flow direction was identified as northwest, north, northeast for the shallow screened wells, and northeast for the deep screened wells. Historical monitoring reports also indicate that groundwater flow directions at the project site range to the west and southwest.

The project would include improvements to an approximately 1,400 sf portion of the existing property on the south side of Green Valley Road, and a new sewer lateral connection within an existing asphalted section of Green Valley Road, approximately 350 feet west of the Bridgeway Gas Station. The deepest excavations anticipated for construction would be approximately 5 to 7 feet. Given the relatively shallow depth of excavation and the deeper underlying groundwater table, project construction activities are not anticipated to encounter groundwater. The project would not result in a change in the groundwater flow pathways or the spread of contaminated groundwater associated with the Bridgeway Gas Station site.

In July 2019, discrete soil samples were collected at depths of 5-feet and 13.5-feet bgs from the eastern portion of the property at 4115 North Gravenstein Highway. Composite soil samples were also collected from four borings located within Green Valley Road in the project vicinity. Laboratory results indicated that the tested soil was below the reportable detection limits for total petroleum hydrocarbons (TPH) as gasoline, benzene, toluene, ethylbenzene, and xylenes (AAL 2019). Based on the results of the soil samples and the isolated nature of the contamination at the Bridgeway Gas Station site, construction activities including utility trenching is not anticipated to encounter residual concentrations of hydrocarbons or other hazardous wastes in the soil. The impact would be less than significant.

**e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? (No Impact)**

The project site is not located within an Airport Referral Area as designated by the Sonoma County Comprehensive Airport Land Use Plan or within two miles of a public use airport. No impact would result.

**f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (No Impact)**

The project would not impair or physically interfere with implementation of Sonoma County's adopted emergency operations plan. The project would not generate new traffic, would not require temporary or permanent roadway closures, and would not affect emergency response routes. No impact would result.

**g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (Less than Significant)**

The project site is not located within a Fire Hazard Severity Zone (Sonoma County 2014 & 2017, Cal Fire 2008), but is located in an area mapped as a fire-threatened community for wildland fires (ABAG 2019). The project site is comprised of existing hardscapes and immediate roadside adjacent areas with ruderal grasses. The potential for construction activities to result in fires would be low. The project would not otherwise increase exposure to wildland fire above existing conditions. The impact would be less than significant.

## 4.10 Hydrology and Water Quality

| | Potentially Significant Impact | Less-than-Significant with Mitigation Incorporated | Less-than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | | | ✓ | |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | | | | ✓ |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: | | | | |
| i) Result in substantial erosion or siltation on- or off-site? | | | | ✓ |
| ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | | | | ✓ |
| iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | | | | ✓ |
| iv) Impede or redirect flood flows? | | | | ✓ |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | | | | ✓ |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | | | | ✓ |

**a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? (Less than Significant)**

Areas to be disturbed during construction would consist predominantly of underlying soils that have been highly altered from their original, natural state. The proposed concrete driveway pullout would be installed on the south side of Green Valley Road in an area currently occupied by roadside adjacent lands with ruderal grasses, an overhead electrical pole, and a Sonoma County Transit bus stop. If required, an existing below ground storm drain would be reconstructed beneath the concrete driveway pad. The existing storm drain conveys storm water to a roadside drainage ditch west of the

proposed receiving station. The concrete pad would be graded to avoid runoff to adjacent properties, and runoff would be directed to a drain, which will discharge to the sanitary sewer system.

During construction, the project would include grading, cuts, and fills that have the potential to cause erosion. Project construction activities could also be a source of chemical contamination from use of alkaline construction materials (e.g., concrete) and hazardous or toxic materials (e.g., fuels, solvents, asphalt, and paints). Erosion and sediment control provisions of the County Construction Grading and Drainage Ordinance (Municipal Code Chapter 11) and Storm Water Quality Ordinance (Municipal Code Chapter 11A) require submission of an Erosion and Sediment Control Plan and implementation of best management practices to reduce erosion. These mandatory ordinance requirements and adopted best management practices are designed to maintain potential water quantity impacts at a less than significant level during and post construction. Therefore, the potential impact would be less than significant.

**b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (No Impact)**

The proposed project improvements would be located in the Wilson Grove Formation Highlands groundwater basin (1-059). The 2019 priority ranking for this groundwater basin was low and the basin is not critically over drafted (DWR 2019). Project excavations would be shallower than the underlying groundwater table, however, if excavations encounter shallow groundwater, temporary dewatering would be required to provide a dry work area. Such temporary dewatering would have, at most, a very small effect on localized water levels in the immediate vicinity of the excavation, and no substantial deficit in aquifer volume or lowering of water levels would occur. Following construction, the project would not require a substantial demand for potable water, and would not utilize groundwater. No impact would result.

**c, i-iv) 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? (No Impact)**

The proposed concrete driveway pullout would be installed on the south side of Green Valley Road in an area currently occupied roadside adjacent lands with ruderal grasses, an overhead electrical pole, and a Sonoma County Transit bus stop. If required, an existing below ground storm drain would be reconstructed beneath the concrete driveway pad. The existing storm drain conveys storm water to a roadside drainage ditch west of the proposed receiving station. The project would result in approximately 1,400 square feet of new impervious surfaces, which is less than the 10,000 square feet regulatory standard for requiring low impact development requirements as contained in the Sonoma County's municipal storm water permit (Order No. R1-2015-0030). Additionally, the concrete pad would be graded to avoid runoff to adjacent properties, with runoff to be directed to a drain which will discharge to the sanitary sewer system. The project would not alter the course of a drainage channel, would not substantially increase surface runoff, or create substantial additional sources of polluted runoff. The receiving station would include concrete curbing and drainage to contain potential spills and would direct all spills and runoff into the wastewater collection system. No impact to drainage would result.

**d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (No Impact)**

The project site is not located within a 100-year flood zone (FEMA 2008), a tsunami inundation area (Cal EMA 2009), or near a large body of water that may be affected by a seiche. No impact would result.

**e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (No Impact)**

The North Coast Regional Water Quality Control Board Basin Plan establishes thresholds for key water resource protection objectives for both surface waters and groundwater. Erosion control BMPs would be required to be implemented during construction to prevent erosion and to protect overall water quality. The project is located within a low priority groundwater basin (No. 1-059), and the project would not utilize groundwater beyond minimal construction dewatering (if required). No conflicts with an existing or foreseeable sustainable groundwater management plan have been identified. No impact would result.

## 4.11 Land Use and Planning

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

**a) Physically divide an established community? (No Impact)**

The project would include construction of a wastewater receiving station, concrete driveway pullout, retaining wall, and sewer lateral connection on previously disturbed and developed lands within and adjacent to Green Valley Road. The proposed improvements would be located within the public right of way, but outside of the existing path of travel for Green Valley Road. The project does not include new features that would physically divide an established community. No impact would result.

**b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (No Impact)**

The project would be located entirely within the existing public right of way associated with Green Valley Road. The Sonoma County General Plan identifies Green Valley Road as a main arterial.

Specific Sonoma County General Plan policies adopted for the purpose of avoiding environmental effects are evaluated in this document under the corresponding issue areas; for example, policies related to noise are evaluated in Section 4.13, Noise. No conflicts with land use plans, policies, or regulations have been identified and no exceptions or reductions to standards would be necessary to approve the project. Therefore, the project would not conflict with any applicable requirements adopted for the purpose of avoiding or mitigating an environmental effect. No impact would result.

## 4.12 Mineral Resources

| | Potentially Significant Impact | Less-than-Significant with Mitigation Incorporated | Less-than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| f) 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? | | | | ✓ |
| g) 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? | | | | ✓ |

**a, b) 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 locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (No Impact)**

The project site is not located within a designated mineral resource deposit area (Sonoma County 2010), or within an area classified as MRZ-2 in the California Geologic Survey Special Report 205 (CGS 2013). No locally-important mineral resources are known to occur at the site. No impact would result.

## 4.13 Noise

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

**a) Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Less than Significant)**

The Sonoma County General Plan includes policies to avoid noise sensitive land uses in noise impacted areas (Policy NE-1b), to control non-transportation related noise from new projects (Policy NE-1c), and to require projects to include noise mitigation measures to maintain levels compatible with activities planned for a project site and vicinity (Policy NE-1f). Sonoma County's General Plan and municipal code do not establish construction-related noise standards. Therefore, construction activities would not generate noise levels in excess of applicable standards, and the construction-related impact would be less than significant.

Following construction, the project would not result in the siting of a new noise sensitive land use and would not result in new non-transportation related noise. Therefore, noise standards established in General Plan Policy NE-1b and NE-1c would not be applicable to the project. Noise that would occur as part of project operation would be transportation related. Neither the County of Sonoma or the State of California define the traffic noise level increase that is considered substantial. A standard industry threshold used for project generated traffic is whether traffic were to result in a permanent noise level increase of 3 dBA Ldn or greater in a residential area where the resulting noise

environment would exceed or continue to exceed 60 dBA Ldn. Ldn is defined as the average A-weighted noise level during a 24-hour day, obtained after addition of 10 decibels to levels measured in the night between 10:00 pm and 7:00 am. Highway 116 in the project area is mapped as a noise impacted segment in Sonoma County (Sonoma County 2012), which extends to residential areas along Green Valley Road. Therefore, the above threshold of a permanent noise level increase of 3 dBA Ldn or greater is utilized for the evaluation of transportation related noise increases for the project.

The project would not result in an increase in vehicle trips along Graton Road and Highway 116 as wastewater is currently transported along the same route as proposed by the project. The change that would occur is that transport trucks traveling to the site would travel along Ross Road and Green Valley Road, and then pull into the proposed new driveway on the south side of Green Valley Road. A truck would then connect to the proposed new receiving station control valves for transfer of wastewater Graton CSD collection system. Each delivery would take approximately 10 to 15 minutes on-site, and may potentially include approximately 5 minutes of truck idling for pressurized pumping. Otherwise, the truck engine would be shut off during the transfer process. When exiting the site, trucks would proceed down Green Valley Road to Highway 116. A back-up beeper would sound during reverse motions of a transport truck for safety purposes.

The transport of wastewater from the Occidental CSD to the proposed new Graton CSD receiving station would be scheduled to occur on a weekday (Monday through Friday) between 7 a.m. and 5 p.m. Transport of wastewater to the proposed Graton CSD receiving station would not be scheduled on weekends or after 5 p.m. on a weekday. It is anticipated that transport to the proposed Graton CSD receiving station would occur approximately 3 to 5 days per week. On a day when wastewater transport occurs, approximately 5 to 10 trips would occur over the course of the day. Given that transportation trips would be isolated to daytime periods and would occur at different short-term (10 to 15 minute) periods of the day, the daily average noise level increases would be less than 1 dBA Ldn along both Ross Road and Green Valley Road. Therefore, the impact of transportation related noise would be less than significant.

**b) Result in generation of excessive groundborne vibration or noise levels? (Less than Significant)**

Caltrans recommends a vibration limit of 0.5 inches/second, peak particle velocity (in/sec PPV) for buildings structurally sound and designed to modern engineering standards, 0.3 in/sec PPV for buildings that are found to be structurally sound but where structural damage is a major concern, and a conservative limit of 0.08 in/sec PPV for ancient buildings or buildings that are documented to be structurally weakened (Caltrans 2004). The proposed construction areas would not be located in the vicinity of fragile structures. Therefore, based on Caltrans guidance, this analysis establishes 0.3 in/sec PPV as the significance threshold for construction vibration to avoid damage to buildings from vibration sources.

The construction equipment that would generate the highest vibration levels include pile drivers and jack hammers. Pile driving is not anticipated to be required for construction of the project. The nearest structure to the construction area is a single family residence located approximately 150 feet to the southwest. At this distance, the vibration levels produced by the proposed construction equipment would be would be well below the 0.3 in/sec PPV threshold (FTA 2006). Therefore, the construction-related impacts to groundborne vibration would be less than significant.

Following construction, the project would not result in exposure of persons to or generation of excessive groundborne vibration levels. The vibration levels associated with a loaded wastewater transport truck would be approximately 0.04 in/sec PPV or less at adjacent residences along Ross Road, and less than 0.01 in/sec PPV at the nearest residence adjacent to the proposed receiving station site. Such levels would be well below the 0.3 in/sec PPV threshold. Therefore, the operational impacts to groundborne vibration would be less than significant.

**c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (No Impact)**

The project site is not located within an Airport Referral Area as designated by the Sonoma County Comprehensive Airport Land Use Plan, or within two miles of a public airport. No Impact would result.

## 4.14 Population and Housing

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

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

The proposed project does not involve the construction of new homes or businesses. The project would not expand or modify the Graton CSD wastewater treatment facilities, regional roadways, highways, water supplies, or otherwise remove an obstacle to population growth. The project would create the equivalent of up to 1 new full-time Graton CSD employment opportunity for a truck driver. The project is not anticipated to induce substantial population growth. The impact would be less than significant.

**b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (No Impact)**

No housing or people would be displaced by the project and no replacement housing would be required. No impact would result.

## 4.15 Public Services

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

**a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public services? (No Impact)**

As discussed in Section 4.14, Population and Housing, implementation of the project would not induce population growth and, therefore, would not require expanded fire or police protection facilities to maintain acceptable service ratios, response times, or other performance objectives. The project would not result in an increase in student population, and therefore, no new or expanded schools would be required. The project would not result in the increased use of existing parks and other public facilities as it would not induce population growth. The project would not require the expansion of recreational facilities to maintain acceptable service ratios in parks, and would not require the expansion of other public facilities. No impact on public services would result.

## 4.16 Recreation

| | Potentially Significant Impact | Less-than-Significant with Mitigation Incorporated | Less-than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | | | | ✓ |
| b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? | | | | ✓ |

**a, b) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or include or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? (No Impact)**

As discussed in Section 4.14, Population and Housing, implementation of the project would not induce population growth. The use of existing neighborhood and regional parks or other recreational facilities would not change as a result of the project. The project would not include construction activities within an existing recreational property or require new or expanded recreational facilities. No impact would result.

## 4.17 Transportation

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

**a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (Less than Significant with Mitigation)**

Sonoma County Transit Route 20 utilizes Green Valley Road in the project area, and an existing Sonoma County Transit in-street bus stop is located within the construction area boundary for the proposed receiving station. The existing bus stop is characterized as a sign stop. The bus stop does not include passenger amenities, such as a bus stop bench or shelter. The stop is located in an area with low land-use density and low ridership.

The bus stop would be impacted by construction and would need to be temporarily relocated. Therefore, the impact on the performance and safety of public transit at this location would be significant. Following construction, the project may potentially result in a beneficial effect on the functionality of the Route 20 bus stop, as the improvements would provide additional roadside pullout space for a bus. However, coordination with Sonoma County Transit would be required, and in the event that a permanent relocation of the bus stop is required, the impact would be considered significant.

The project would not affect bicycle and pedestrian facilities, and would not introduce new users of alternative modes of transportation into the area. No impact to such facilities would result.

### Mitigation

Mitigation Measure TR-1 would reduce the impact of construction on the performance and safety of the eastbound bus stop on Green Valley Road near Hicks Road by requiring coordination with Sonoma County Transit to arrange the temporary and/or permanent relocation of the bus stop, if necessary.

### Mitigation Measure TR-1: Coordinate Transit Controls

Graton CSD shall coordinate with Sonoma County Transit and the County of Sonoma to design and implement the receiving station driveway for compatibility with the existing Route 20 bus stop located along the eastbound lane of Green Valley Road near Hicks Road. Prior to construction activities, the Graton CSD shall work with Sonoma County Transit to temporarily and/or permanently relocate the bus stop located along the eastbound lane of Green Valley Road near Hicks Road or develop design strategies to co-locate the bus stop if desired by Sonoma County Transit. The temporary or permanent bus stop relocation shall be located in an acceptable location that minimizes impacts to bus users and provides safe access and egress for transit passengers in compliance with local transit agency policies and, where applicable, the FHWA Pedestrian Safety Guide for Transit Agencies.

**b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (No Impact)**

As of July 1, 2020 and pursuant to Senate Bill 743, the new metric for identifying significant transportation impacts under CEQA is the measurement of vehicle miles traveled (VMT). VMT refers to the amount and distance of automobile travel attributable to a project. In December 2018, OPR published the Technical Advisory on Evaluating Transportation Impacts in CEQA. The advisory contains recommendations regarding the assessment of VMT impacts under CEQA, including screening thresholds for small projects.

Implementation of the project would result in a reduction in VMT. Trucks transporting wastewater from the Occidental CSD to the proposed Graton CSD receiving station would travel approximately 7 vehicle miles for a one-way trip. Under existing conditions, trucks transporting wastewater from the Occidental CSD to the ALWSZ WWTF travel approximately 18 vehicle miles for a one-way trip. Therefore, the project would reduce one-way trip lengths by 11 miles compared to baseline conditions. No VMT impact would result.

**c,d) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), or result in inadequate emergency access? (Less than Significant with Mitigation)**

#### Construction

Construction of the project would result in a short-term increase in vehicle trips on local roadways, including Highway 116 and Green Valley Road. The addition of construction-related vehicles would not substantially affect congestion on local roadway segments because trips would occur at differing periods of the day and would represent a small percentage of the capacity of the roadways. The temporary impact of increased truck traffic would be less than significant. However, construction of the project also would temporarily alter the normal functionality of Green Valley Road due to the potential need for a temporary partial lane closure and work within and adjacent to the roadway during construction. The temporary construction-related impact would be significant.

#### Operation

Following construction, the project would not result in an increase in vehicle trips along Graton Road and Highway 116 as wastewater is currently transported along the same route as proposed by the project. The change that would occur is that transport trucks traveling to the site would also travel

along Ross Road and Green Valley Road, and would then pull into the proposed new roadside pullout on the south side of Green Valley Road. A change also would occur in the overall distance of wastewater transportation, as the project would reduce the length of a one-way wastewater transportation trip from the existing 18 mile route from Occidental CSD Lift Station to the ALWSZ to a 7 mile route to the proposed Graton CSD receiving station.

The proposed receiving station driveway pullout would be of sufficient length such that a 30-foot long transport truck would not obstruct the sight distance or intersection corner sight distance from turning movements at Hicks Road during offloading operations. The driveway would be required to comply with current County standards for stopping sight distance, intersection corner sight distance and driveway radii. The receiving station would be located along a tangent inclined section of Green Valley Road that provides adequate lines of sight between the site and oncoming drivers. The proposed station is adequately set back from the intersection of Green Valley Road and Hicks Road so as not to be within the corner sight distance for turning traffic from Hicks Road onto Green Valley Road. The proposed site also is located outside of the functional area of the Green Valley Road/Highway 116 intersection. Therefore, the potential for the project to cause speed differentials or increase conflicts on Green Valley Road is considered low. The new pipeline would be located below ground, and existing conditions along the temporarily impacted roads would be restored to pre-existing conditions. The impact would be less than significant.

Transport vehicles would be staged and maintained at the Graton CSD WWTP when not in use. Access to and from the Graton CSD WWTP would be provided from Ross Lane and a 700-foot segment of the West County Regional Trail, both of which are currently utilized by worker vehicles and delivery trucks. The project would not alter the existing alignment of Ross Lane or the West County Regional Trail and would result in approximately two vehicle trips per day on a day when transport is occurring. The trips would not represent an incompatible use with existing vehicle access and deliveries to the Graton CSD WWTP. The impact would be less than significant.

### Mitigation

Mitigation Measure TR-2 would reduce the potential impact of increased traffic safety hazards or inadequate emergency access resulting during construction on Green Valley Road to a less-than-significant level, which would be accomplished by requiring Graton CSD and/or its contractor to implement a traffic control plan to reduce potential impacts on traffic flows and safety hazards. The traffic control plan would minimize the potential impact by providing for continuity of vehicle traffic, ensuring worker and vehicle safety within construction zones, and prescribing traffic detours (if needed) to reduce the potential impacts.

#### Mitigation Measure TR-2: Traffic Control Plan

Prior to construction, the Graton CSD and its contractor(s) shall prepare a traffic control plan for affected roadways and intersections. The traffic control plan shall be submitted to the County of Sonoma and Sonoma County Transit for review as part of the encroachment permit process. The traffic control plan shall include sufficient measures to address the overall project construction, as well as appropriate site-specific measures, including measures to reduce potential impacts on traffic flows on roadways affected by project construction activities. The traffic control plan shall comply with local jurisdiction requirements and be tailored to reflect site-specific traffic and safety concerns, as appropriate. The traffic control plan shall include, but not necessarily be limited to, the following measures as applicable to site-specific conditions:

Traffic Controls

- Circulation and detour plans (if required) shall be developed to minimize impacts on local street circulation. Haul routes that minimize truck traffic on local roadways and residential streets shall be utilized to the extent feasible. Flaggers and/or signage shall be used to guide vehicles through and/or around the construction zone.
- Lane closures shall be limited during peak hours to the extent feasible. In addition, outside of allowed working hours, or when work is not in progress, roads shall be restored to normal operations, with any trenches covered with steel plates.
- Roadside safety protocols shall be implemented, such as advance “Road Work Ahead” warning signs, and speed control (including signs informing drivers of State-legislated double fines for speed infractions in a construction zone) shall be provided to achieve required speed reductions for safe traffic flow through the work zone.
- Roadway rights-of-way outside the footprint of the proposed facility shall be repaired or restored to their general pre-construction condition (or better) upon completion of construction.
- The traffic control plan shall also conform to applicable provisions of the State’s Manual of Traffic Controls for Construction and Maintenance Work Areas.
- Access to driveways and private roads shall be maintained.
- Construction shall be coordinated with administrators of land uses that may be more significantly affected by traffic impacts, such as police and fire stations, transit stations, hospitals, ambulance providers, and schools. Emergency responders, and other more significantly affected facility owners and/or operators shall be notified by the Graton CSD in advance of the timing, location, and duration of construction activities and the locations and durations of any temporary detours and/or lane closures.

## 4.18 Tribal Cultural Resources

| | Potentially Significant Impact | Less-than-Significant with Mitigation Incorporated | Less-than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| a) Cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in Public Resources Code section 5020.1(k)? | | ✓ | | |
| b) Cause a substantial adverse change in the significance of a tribal cultural resource that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe. | | ✓ | | |

An Archaeological Resources Study was prepared for the project by the Sonoma State University Anthropological Studies Center (ASC 2019). The study assessed the potential for surficial and/or buried archaeological resources in the proposed improvement area through the completion of the following:

- Records and literature search at the Northwest Information Center (NWIC) of the California Historical Resources Information Center (CHRIS);
- Further literature review of publications, files, and maps for ethnographic, historic-era, and prehistoric resources and background information;
- Communication with the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File and contact information for the appropriate tribal communities;
- Contact with the appropriate local Native American Tribes; and
- Pedestrian archaeological survey of the project area.

Since completion of the 2019 Archaeological Resources Study, the proposed location of the wastewater receiving station was modified. However, the new proposed location of the receiving station south of Green Valley Road remains within the overall project area that was previously evaluated in the 2019 Archaeological Resources Study, including the area in which an archaeological pedestrian survey was conducted. The study results are used as a supporting basis for evaluating potential impacts to historic and cultural resources under CEQA.

**a,b) Cause a substantial adverse change in the significance of a tribal cultural resource? (Less than Significant with Mitigation)**

CEQA requires lead agencies to determine if a proposed project would have a significant effect on tribal cultural resources. The CEQA Guidelines define tribal cultural resources as: (1) a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or eligible for listing on the California Register of Historical Resources, or on a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant according to the historical register criteria in Public Resources Code Section 5024.1(c), and considering the significance of the resource to a California Native American tribe.

Efforts to identify tribal cultural resources that could be affected by the project included a records search at the Northwest Information Center, literature review, a sacred lands search through the Native American Heritage Commission, contact with appropriate local Native American Tribes, and a pedestrian archaeological survey of the project site. To date, the Graton CSD has not received requests from California Native American tribes for notifications under Assembly Bill 52.

The Native American Heritage Commission Sacred Lands File search noted that a Sacred Site may be located in the project vicinity. On August 23, 2019, the Sonoma State University Anthropological Studies Center contacted California Native American tribes culturally affiliated with the project area in writing. On August 28, 2019, a response was sent by the Federated Indians of Graton Rancheria (FIGR), requesting the results of the archaeological resources study. On August 30, 2019, a response was sent by the Stewarts Point Rancheria Kashia Band of Pomo Indians stating that the project is outside of the Aboriginal Territory of their tribe. On September 9, 2019, the results of the archaeological study were shared with the FIGR, who responded on the same day that the project area has the potential to locate tribal cultural resources that have not been previously recorded. FIGR's Tribal Heritage Preservation Officer recommended that a Tribal cultural monitor be on site during the project to ensure its protection should any resource be identified. Therefore, if tribal cultural resources are encountered during construction, a potentially significant impact could occur.

### Mitigation

Implementation of Mitigation Measure TCR-1 would reduce the potential impact to tribal cultural resources to a less-than-significant level by implementing a construction monitoring procedure to address discovery of any previously unrecorded resources consistent with appropriate laws and requirements.

> **Mitigation Measure TCR-1: Protect Tribal Cultural Resources during Construction Activities**
>
> The Graton CSD shall coordinate with the Federated Indians of the Graton Rancheria regarding their recommendation for monitoring of tribal cultural resources during construction. If a find qualifies as a tribal cultural resource as defined by CEQA, the Graton CSD shall coordinate with the Federated Indians of Graton Rancheria to ensure that appropriate actions to protect the resource are taken and that no additional resources are affected.

## 4.19 Utilities and Service Systems

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

**a, c) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects, or 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? (Less than Significant)**

The proposed project would include a 10-year agreement between Graton CSD and Sonoma Water for transferring of trucking operations and treatment and disposal of Occidental CSD's wastewater. The project would include a new wastewater receiving station on an approximately 1,400 sf portion of the existing property on the south side of Green Valley Road, and a new sewer lateral connection within an existing asphalted section of Green Valley Road. The receiving station would be connected to an existing power line adjacent to the project site.

The Graton CSD operates in accordance with Waste Discharge Requirements and NPDES Permit No. CA0023639 established by Order No. R1-2018-0001 and currently treats wastewater to Title 22

disinfected tertiary recycled water standards as its primary treatment mode. The proposed project would not require modifications to the Graton CSD wastewater treatment facilities. The project would not increase the amount of wastewater generated within the Occidental CSD or increase the capacity of the wastewater treatment facilities within the Graton CSD. The ADFW that would be transported and treated at the Graton CSD WWTP is 17,000 gpd. Graton CSD's treatment facilities are designed to treat 140,000 gpd. Graton CSD's ADWF for 2019 and 2020 was 86,000 gpd. The existing unused capacity is sufficient for accommodating Occidental CSD's ADWF as well as growth in Graton in terms of the District annual limit of 12 equivalent single-family dwelling units allowed per calendar year. When transport of wastewater is required during peak wet weather periods when flows exceed Graton CSD's capacity to treat, wastewater would be transported to Sonoma Water's ALWSZ WWTF located near the Town of Windsor. The project would not impair the ability of the Graton CSD to continue serving existing or foreseeable future commitments. The impact would be less than significant.

The potential environmental impacts associated with construction of the proposed utilities are evaluated as part of this Initial Study. No utility relocation or construction of off-site utilities beyond those identified in the project description and evaluated in this Initial Study would be required that would cause environmental effects.

**b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (No Impact)**

The project would not result in an increase in groundwater use, as the project would not result in an increase in population growth or a new high water demand land use. No new regional water supplies or facilities would be required. No impact would result.

**d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? (Less than Significant)**

Construction of the project would result in a temporary increase in solid waste disposal needs associated with demolition and construction wastes, such as demolished asphalt pavement, concrete, and excavated soils. Construction waste with no practical reuse or that cannot be salvaged or recycled would be disposed of at a local transfer station or solid waste facility. Active permitted regional landfills include the Redwood Sanitary Landfill (26 million cubic yards remaining capacity), Potrero Hills Landfill (13.9 million cubic yards remaining capacity), Vasco Road Landfill (7.4 million cubic yards remaining capacity), and Keller Canyon Landfill (63.4 million cubic yards remaining capacity) (CalRecycle 2016). Solid waste generated by the project would represent a small fraction of the daily permitted tonnage of these facilities, therefore, the project's construction-related solid waste disposal needs would be sufficiently accommodated by existing landfills. The impact would be less than significant. Following construction, project operation would not generate additional solid waste. No operational impact would occur.

**e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (No Impact)**

No applicable federal solid waste regulations would apply to the project. At the State level, the Integrated Waste Management Act mandates a reduction of waste being disposed and establishes

an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. The project would not conflict with or impede implementation of such programs. Following construction, project operation would not generate additional solid waste. No impact would result.

## 4.20 Wildfire

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

**a) Substantially impair an adopted emergency response plan or emergency evacuation plan or exacerbate wildfire risks? (No Impact)**

The project site is not located in or near a State Responsibility Area (SRA) or lands classified as very high fire severity zones. The project is located 2 miles from the nearest SRA and approximately 6 miles from lands classified as a very high fire hazard severity zone (CalFire 2019). Therefore, the CEQA Guidelines Appendix G Checklist section for wildfire is not applicable to the project. No impact would result.

## 4.21 Mandatory Findings of Significance

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

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

Potential project impacts to biological and cultural resources are addressed in Section 4.4, Biological Resources, Section 4.5, Cultural Resources, and Section 4.18, Tribal Cultural Resources, respectively. With implementation of the recommended mitigation measures identified in this IS/MND, the potential for project-related activities to degrade the quality of the environment, including fish or wildlife species or their habitat, plant or animal communities, or important examples of California history or prehistory would be reduced to less-than-significant levels.

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

Cumulative impacts are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355). Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Efforts to identify cumulative projects included contact with the Graton CSD, the Sonoma County PRMD, review of active PRMD construction and planning permits, review of the current Sonoma County Transportation and Public Works Department project list, and review of the Sonoma County General Services Department Capital Improvement Plan for 2019-2024. Projects identified and considered for cumulative impacts include:

- Planned sanitary sewer force main from Occidental CSD to Graton CSD.
- Planned land acquisition and planning for a Class 1 trail paralleling Green Valley Road between Ross Road and Atascadero Creek, located approximately 0.25 mile west of the project site.
- Planned improvements within Green Valley Creek for flood protection and restoration, located approximately 1.2 miles west of the project site.
- Planned capital improvement projects at the Santa Rosa Delta Pond, located approximately 2 miles east of the project site.
- Planned improvements to the intersection of Highway 116 and Mirabel road and shoulder widening of Mirabel Road, located approximately 2.5 miles northwest of the project site.

As summarized in Section 4 of this IS/MND, the project would not result in impacts on agriculture and forestry resources, mineral resources, land use and planning, population and housing, public services, recreational facilities, or wildfire. Therefore, implementation of the project would not contribute to any related cumulative impact on those resources.

The distance between the project site and the identified cumulative projects would prevent the potential for cumulative impacts in the project area related to aesthetics, air quality, biological resources, noise, and traffic. None of the cumulative projects are located adjacent to the project site or the affected project roadways. The nearest identified cumulative project would include acquisition and planning for a future Class 1 trail paralleling Green Valley Road between Ross Road and Atascadero Creek approximately 0.25 mile west of the project site. Based on current schedules, the construction of the cumulative projects would not overlap with the project construction. Given the distance and dissimilarity between the project site and the identified cumulative projects, the project impacts summarized in this IS/MND would not add appreciably to any existing or foreseeable future significant cumulative impact. Incremental impacts, if any, would be very small, and the cumulative impact would be less than significant.

**c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly? (Less than Significant with Mitigation)**

With implementation of the recommended mitigation measures identified in this IS/MND, the potential for project-related activities to cause substantial adverse effects on human beings would be reduced to less-than-significant levels.

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