



Proposed Negative Declaration

Sonoma County Permit and Resource Management Department

2550 Ventura Avenue, Santa Rosa, CA 95403

(707) 565-1900 FAX (707) 565-1103

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State Clearinghouse Number:
Permit Sonoma File Number: **UPE19-0008**
Prepared by: Jennifer Faso
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Pursuant to Section 15071 of the State CEQA Guidelines, this proposed Negative Declaration and the attached Initial Study, constitute the environmental review conducted by the County of Sonoma as lead agency for the proposed project described below:

Project Name: Garden Valley Ranch Use Permit

Project Applicant/Operator: Mavericks Realty LLC/ Jessica Yau

Project Location/Address: 498 Pepper Road, Petaluma

APN: 113-150-011

General Plan Land Use Designation: LEA 60 (Land Extensive Agriculture 60-acre density)

Zoning Designation: LEA (Land Extensive Agriculture District), B6 60 (60-acre density), HD (Historic Combining District), SR (Scenic Resources Combining District)

Decision Making Body: Sonoma County Board of Zoning Adjustments

Appeal Body: Sonoma County Board of Supervisors

Project Description: **See Item III, below**

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” or “Less than Significant with Mitigation” as indicated in the attached Initial Study and in the summary table below.

Table 1. Summary of Topic Areas

Topic Area	Abbreviation	Yes	No
Aesthetics	VIS		X
Agriculture & Forestry Resources	AG		X
Air Quality	AIR		X
Biological Resources	BIO		X
Cultural Resources	CUL		X
Energy	ENERGY		X
Geology and Soils	GEO		X
Greenhouse Gas Emission	GHG		X
Hazards and Hazardous Materials	HAZ		X
Hydrology and Water Quality	HYDRO		X
Land Use and Planning	LU		X
Mineral Resources	MIN		X
Noise	NOISE		X
Population and Housing	POP		X
Public Services	PS		X
Recreation	REC		X
Transportation	TRANS		X
Tribal Cultural Resources	TCR		X
Utilities and Service Systems	UTL		X
Wildfire	FIRE		X
Mandatory Findings of Significance	MFS		X

RESPONSIBLE AND TRUSTEE AGENCIES

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

Table 2

Agency	Activity	Authorization
Sonoma County Environmental Health	Retail Food Facility Permit	Sonoma County Municipal Code, Chapter 14

ENVIRONMENTAL FINDING:

Based on the evaluation in the attached Expanded Initial Study, I find that the project described above will not have a significant adverse impact on the environment.

Jennifer Faso

July 5, 2024

Prepared by:

Date



Expanded Initial Study

Sonoma County Permit and Resource Management Department

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I. INTRODUCTION:

The Garden Valley Ranch/ Jessica Yau requests a Use Permit to allow events at an existing established rose garden. The use permit would allow up to twenty-four (24) event days per year with a maximum of 150 people, using the existing gardens and structures. The request also includes the continued use and legalization of a 550 square foot retail space along with educational farm tours by appointment. A referral letter was sent to the appropriate local, state, and federal agencies and interest groups who may wish to comment on the project.

This report is the Initial Study required by the California Environmental Quality Act (CEQA). The report was prepared by Jennifer Faso, Project Review Planner with the Sonoma County Permit and Resource Management Department, Project Review Division. Information on the project was provided by The Garden Valley Ranch/Jessica Yau. Technical studies were provided by qualified consultants to support the conclusions in this Expanded Initial Study. Technical studies, other reports, documents, and maps referred to in this document are available for review through the Project Planner, or the Permit and Resource Management Department (Permit Sonoma) Records Section.

Please contact Jennifer Faso, Project Planner, at (707) 565-1683, for more information.

II. EXISTING FACILITY

The 5.23-acre subject site is located at 498 Pepper Road, Petaluma, approximately 4 miles outside the city limits of Petaluma in unincorporated Sonoma County (Figures 1 and 2).

The proposed project will utilize the existing 3 acres of rose gardens and existing structures. The site includes a main residence, a barn, a bell tower, and a gazebo with kitchen and bathrooms. Events will take place primarily outdoors. The site contains one well and an existing septic system for wastewater disposal. Access to the site is provided by two driveways off Pepper Road, with the main access to the site via "Eastside Access Road" (Figure 3).

Figure 1: Vicinity Map



Figure 2: Subject Property and Surrounding Areas

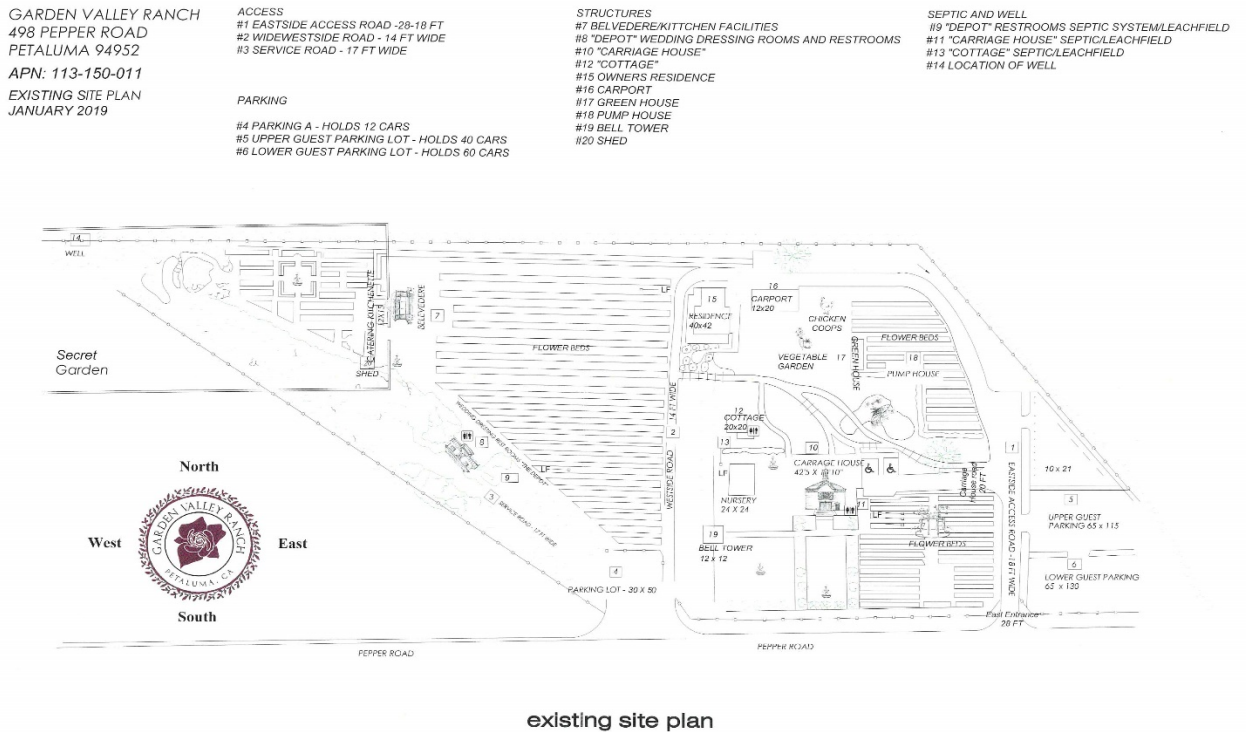


III. PROJECT DESCRIPTION

The project is a request for a Use Permit to allow the following on a developed site that includes a 3 acre rose garden, a main residence, a barn, a bell tower, a gazebo with kitchen and bathrooms. The existing structures will be utilized as part of this use permit. No new construction is proposed.

- 1.) Host up to 24 agricultural promotional special events per year to promote the sale of cut flowers. Events will have a maximum of 150 people.
- 2.) Legalize the existing nursey/farm retail sales operation within an existing 550 square feet structure. The nursey will be open by appointment only, Saturdays and Sundays from mid- February to mid-May.
- 3.) Provide educational farm tours to groups of more than 6 by appointment only, Saturdays and Sundays from mid-February to mid-May.

Figure 3: Garden Valley Ranch Site Plan (See Attachment 1 for full sized plan)



Proposed Food Service:

All food service will be provided by 3rd party professional catering companies. Caterers will only use the Garden Valley Ranch facilities for assembly and warming.

Proposed Hours of Operation:

- Promotional events hours – 10 am-10 pm with all events starting no earlier than 10 am, ending by 9 pm. All guests and vendors will be off the property by 10 pm.
- Retail sales and tours - available Saturdays and Sunday by appointment only from mid-February to mid-May.
- Employees – Garden Valley Ranch is currently operated by the owners with no additional full-time employees. All event staff will be provided by 3rd party caterers.

Summary of Promotional Activities and Events:

Activity	Frequency	Hours of Operation	Max Attendees	Food Service	Use Areas	Amplified Sound
Private Events	Up to 4 event days per year	10am – 10pm (Friday, Saturday or Sunday)	75	3 rd party, professional catering	Belvedere/kitchen and adjacent lawns, Carriage House and adjacent lawns, Secret Garden, Depot	Carriage House interior
Private Events	Up to 5 event days per year	10am – 10pm (Friday, Saturday or Sunday)	100	3 rd party, professional catering	Belvedere/kitchen and adjacent lawns, Carriage House and adjacent lawns, Secret Garden, Depot	Carriage House interior

Activity	Frequency	Hours of Operation	Max Attendees	Food Service	Use Areas	Amplified Sound
Private Events	Up to 5 event days per year	10am – 10pm (Friday, Saturday or Sunday)	130	3 rd party, professional catering	Belvedere/kitchen and adjacent lawns, Carriage House and adjacent lawns, Secret Garden, Depot	Carriage House interior
Private Events	Up to 5 event days per year	10am – 10pm (Friday, Saturday or Sunday)	150	3 rd party, professional catering	Belvedere/kitchen and adjacent lawns, Carriage House and adjacent lawns, Secret Garden, Depot	Carriage House interior
Mother's Day picnic	1 event day in May	10am-2pm (Sunday)	150	None	Belvedere and adjacent lawns	None
Farm Trails - Spring	2 event days in April	10am-4pm (Sat and Sun)		None	Belvedere, Secret Garden, Carriage House	None
Farm Trails - Fall	2 event days in October	10am-4pm (Sat and Sun)	No limit	None	Belvedere, Secret Garden, Carriage House	None
Nursery and farm tours	By appointment only; max of 20 appointments per day	Saturdays and Sundays mid-Feb to mid-May	20	None	Belvedere, Secret Garden, Carriage House	None

Access and Parking:

Main access to the site will be via "Eastside Access Road" with secondary access provided on "Westside Road". Two grass areas will be used for guest parking lots with 100 parking spaces are provided along with an employee parking lot with 12 spaces. The total number of parking spaces provided is 112.

Water, Wastewater and Waste Disposal:

The water supply for the site is provide by an onsite well with capacity to support the project. An on-site septic system will require expansion for the project.

IV. SETTING

The 5.23-acre project site is located 4 miles outside of the City of Petaluma in Unincorporated Sonoma County, approximately a ½ mile from the intersection of Stony Point Road and the Highway 101 southbound on ramp. The site is surrounded by a Dairy farm on three sides and a wholesale nursery on the other side, across Pepper Road. The developed site is flat and contains 3 acres of roses, a main residence, a barn, a bell tower, a gazebo with kitchen and bathrooms.

Surrounding Uses and Zoning

North: Dairy Ranch zoned LEA (Land Extensive Agriculture)
 South: Wholesale Nursey zoned LEA (Land Extensive Agriculture)
 East: Dairy Ranch zoned LEA (Land Extensive Agriculture)
 West: Dairy Ranch zoned LEA (Land Extensive Agriculture)

V. ISSUES RAISED BY THE PUBLIC OR AGENCIES

On July 8, 2019, Permit Sonoma circulated a referral packet to inform and solicit comments from selected relevant local, state and federal agencies, local Tribes, neighbors within 300

feet of the project site; and to special interest groups that were anticipated to take interest in the project. Comments were received from:

- Permit Sonoma Code Enforcement
- Permit Sonoma Fire Division
- Permit Sonoma Natural Resources Division
- Permit Sonoma Grading and Stormwater Division
- Permit Sonoma Health Specialist
- Sonoma County Public Infrastructure, formerly Department of Transportation and Public Works
- Sonoma County Environmental Health

Referral agency comments included standard conditions of approval for the project.

Assembly Bill 52 Project Notifications were sent to the Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria Band of Pomo Indians, Torres Martinez Desert Cahuilla Indians, Mishewal Wappo Tribe of Alexander Valley, Middletown Rancheria Band of Pomo Indians, Lytton Rancheria of California, Kashia Pomos Stewarts Point Rancheria and Federated Indians of Graton Rancheria. No Tribe requested formal consultation on the proposed project.

No Public Comments on the proposed project have been received to date.

VI. EVALUATION OF ENVIRONMENTAL IMPACTS

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

No Impact: The project would not have the impact described. The project may have a beneficial effect, but there is no potential for the project to create or add increment to the impact described.

Less Than Significant Impact: The project would have the impact described, but the impact would not be significant. Mitigation is not required, although the project applicant may choose to modify the project to avoid the impacts.

Less Than Significant with Mitigation Incorporated: The project would have the impact described, and the impact could be significant. One or more mitigation measures have been identified that will reduce the impact to a less than significant level.

Potentially Significant Impact: The project would have the impact described, and the impact could be significant. The impact cannot be reduced to less than significant by incorporating mitigation measures. An environmental impact report must be prepared for this project.

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

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

1. AESTHETICS:

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

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

Comment:

The project site is within the Sonoma County's Scenic Resource Combining District for a Community Separator. All structures located within a Community Separator (CS) are subject to the standards in Zoning Code Section 26-64-020 and General Plan Policy ORSC-2D, which requires that all structures within the CS use natural landforms and existing vegetation to screen them from view from public roads. If necessary, Zoning Code Section 26-64-020 specifies that new landscaping used for screening should be comprised of native, fire resistant plants and trees.

The proposed project will not include any new construction. All existing structures are screened from view by existing landscaping therefore the proposed project will not have a substantial adverse effect on a scenic vista.

Significance Level:

No Impact

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

Comment:

The parcel is not located adjacent to a state scenic highway.

Significance Level:

No Impact

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

Comment:

The character of the site and the surrounding lands is agricultural and rural development. The proposed use permit will not change the visual character of the site because no new construction is proposed with this use permit and the visual character of the site will not change.

Significance Level:

No Impact

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

Comment:

No new structures are proposed with this project that would create new light or glare. Outdoor low level string lights will be used for outdoor events after dark. These lights and all exterior lighting on the site will meet County standards under Article 82 of the Zoning Code (Design Review) ensuring that exterior lighting is designed to prevent glare and preclude the trespass of light on to adjoining properties and in the night sky.

Significance Level:

No Impact

2. AGRICULTURE AND FOREST RESOURCES:

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

Would the project:

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

Comment:

The site currently contains approximately 3 acres of rose gardens on land designated as Farmland of Local Importance on the Sonoma County Important Farmland Map. The proposed project will not remove any of the rose gardens and no new construction is proposed. Therefore, the project will not Convert Prime, Unique of Statewide Important Farmlands.

Significance Level:

No Impact

- b) **Conflict with existing zoning for agricultural use, or Williamson Act Contract?**

Comment:

The project site is zoned LEA (Land Extensive Agriculture) which allows with an approved use permit authorized events that are secondary and incidental to the primary agricultural use of the property and that promote the local production and marketing of agricultural produces grown and process on-site or within Sonoma County. With an approved use permit the proposed project would be consistent with existing zoning.

The project site is not subject to a Williamson Act Contract.

Significance Level:

No Impact

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

Comment:

The project site is not under the TP (Timberland Production) zoning district; therefore, the project will not conflict with, or cause the rezoning of, forested land or timberland zoned Timberland Production.

Significance Level:

No Impact

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

Comment:

The project does not result in a lost of forested land or conversion of forest land to non-forest use as the project site does not contain forest land nor any timber resources.

Significance Level:

No Impact

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

Comment:

The project does not involve other changes in the environment that could result in conversion of farmland to non-agricultural use or forest land to non-forest use. The project site will remain zoned Land Extensive Agriculture (LEA) and the existing rose gardens will remain on site.

Significance Level:

No Impact

3. AIR QUALITY:

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

Would the project:

- a) **Conflict with or obstruct implementation of the applicable air quality plan?**

Comment:

The project is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD) which is currently designated as a nonattainment area for state and federal ozone standards, the state PM 10 standard, and the state and federal PM 2.5 standard. The District has adopted an Ozone Attainment Plan and a Clean Air Plan in compliance with Federal and State Clean Air Acts. These plans include measures to achieve compliance with both ozone standards. The plans deal primarily with emissions of ozone precursors (nitrogen oxides (NOx) and volatile organic compounds, also referred to as Reactive Organic Gases (ROG)). The project will not conflict with the District's air quality plans because the proposed use is well below the emission thresholds for ozone precursors or involve construction of transportation facilities that are not addressed in an adopted transportation plan see discussion in 3 (b) below.

Significance Level:

Less than Significant Impact

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

Comment:

Emissions from traffic accessing the project site will be below the BAAQMD thresholds for net increase and will not obstruct the implementation of the applicable air quality plan. It is estimated that project would result in approximately 60 net new trips average per day.

The BAAQMD's 2022 CEQA Air Quality Guidelines provide screening criteria for determining if a project could result in the generation of operational criteria air pollutants or precursors that exceed thresholds of significance. An outdoor garden with events and small retail is not listed as a land use in

the BAAQMD screening criteria; however, a general comparison can be made to similar land uses. The operational screening size for a city park land use is 175 acres of facilities, which is the closest listed recreational land use. The operational screening size for a convenience market is 11,000 square feet. The project is well below both thresholds as a 5.23-acre site with a 550-square-foot retail space. The BAAQMD screening analysis for a carbon monoxide hotspot is whether a project would increase traffic volumes at a nearby intersection to more than 44,000 vehicles per hour. The project would generate an average of 60 trips on a daily basis. This amount of vehicle trips would not generate significant emissions, and therefore, would not significantly contribute to formation of a carbon monoxide hotspot in the project area. In addition, the project would have no long-term effect on PM2.5 and PM10, as the project involves no construction and operational dust generation would be minimal. The project would be less than the BAAQMD's operational criteria pollutant and precursor screening level and would not result in substantial long-term operational emissions of criteria air pollutants. Therefore, the project's contribution to a cumulative nonattainment criteria pollutant impact would be less than significant.

Significance Level:

Less than Significant Impact

c) Expose sensitive receptors to substantial pollutant concentrations?

Comment:

Sensitive receptors include hospitals, schools, convalescent facilities, and residential areas. The project site is located in a predominantly rural area, away from concentrated residential areas and institutional receptors (the closest school is Liberty Elementary School, located over a 1 mile to the west and the nearest hospital is Petaluma Valley Hospital located 5 miles to the east).

Based on the analysis in Section 3.a and 3.b, the project would not result in substantial pollutant exposure due to operations. The proposed project will not expose sensitive receptors to substantial pollutant concentrations because no new construction is proposed as a result of this project and the proposed activities on site will not result in emissions above BAAQMD screening levels.

Significance Level:

Less than Significant Impact

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

Comment:

The proposed project will not include activities that will result in emission and no new construction is proposed as a result of this project.

Significance Level:

No Impact

4. BIOLOGICAL RESOURCES:

Would the project:

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

Comment:

The project site is located within federally-designated Critical Habitat for California tiger salamander and is also within the boundaries of the Santa Rosa Plain, as mapped by the Santa Rosa Plain Conservation Strategy¹ and the Programmatic Biological Opinion² between the U.S. Fish and Wildlife Service and the Army Corps of Engineers. The 2020 Programmatic Biological Opinion (PBO) replaces all earlier PBOs from 1998, 2007, and 2009; it also incorporates the Conservation Strategy and includes potential impacts to Critical Habitat for California tiger salamander (CTS) within the analysis to provide a comprehensive long-term conservation plan and conservation measures to avoid, minimize, and compensate for adverse effects at project sites and guide the conservation of individuals, seedbank, and habitat within the Santa Rosa Plain. The PBO addresses potential impacts to CTS and three federally-listed wetland plant species: Burke's goldfields, Sebastopol meadowfoam, and Sonoma sunshine.

All areas to be affected directly or indirectly by a project action are included in evaluation of impacts, not merely the immediate area involved in a project action. The Santa Rosa Plain Action Area includes 66,899 acres of land within the Santa Rosa Plain, extending from Windsor south to just north of Petaluma. The southern boundary of the Action Area terminates at Pepper Road (i.e., parcels on the opposite side of Pepper Road from the project area are outside of the regulatory Action Area and outside of Critical Habitat). According to the PBO, the project site is located greater than 2,200 square feet from a known breeding pond (approximately 3,000 feet away estimated by GIS mapping) but is within 1.3 miles from a breeding pond. Sites within 2,200 square feet of breeding habitat are given priority for conservation.

The PBO defines a covered project as one which is not likely to destroy or adversely modify designated critical habitat through habit degradation or modification involving construction or other ground disturbance, including clearing, grubbing, plowing, disking, or tilling with mechanical equipment for non-construction agricultural uses. All minimization measures recommended by the PBO are related to construction or ground-disturbing impacts. Mitigation is required for projects which involve construction or other ground disturbance.

There are no seasonal wetlands or ponds within the project parcel which could provide habitat to listed Santa Rosa Plain plant species or CTS. In addition, because the project does not include any new construction or other ground disturbance which would destroy or modify potential upland habitat for CTS and would not erect any sort of barrier fences to preclude movement of CTS through the parcel, the project is not likely to destroy or adversely modify designated critical habitat or have a significant impact on California tiger salamander or listed plant species.

Significance Level:

Less than Significant Impact

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

Comment:

The project site is not located within a riparian corridor as identified on the County of Sonoma Zoning map and therefore the project will not have an adverse effect on any riparian habitat or other sensitive natural community.

¹ *Santa Rosa Plain Conservation Strategy*. Conservation Strategy Team. December 1, 2005.
<https://www.fws.gov/media/santa-rosa-plain-conservation-strategy-figures-1-through-5>

² *Reinitiation of Formal Consultation on Issuance of Clean Water Act, Section 404 Permits by the U.S. Army Corps of Engineers (Corps) on the Santa Rosa Plain, Sonoma County, California*. U.S. Department of the Interior, Fish and Wildlife Service, Sacramento Office. June 11, 2020.
<https://www.fws.gov/media/santa-rosa-plain-conservation-strategy-appendix-b-biological-opinions>

Significance Level:

No Impact

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

Comment:

The project site does not contain a state or federally protected wetland. The site is fully developed, as confirmed by a County Staff site visit.

Significance Level:

No Impact

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

Comment:

The project site is currently developed, and no new construction is associated with this use permit. Therefore, the natural environment will not change as a result of this project. There is no riparian corridor onsite or nearby which could function as a movement corridor for native wildlife species, and no new fences or other barriers are proposed by the project which could impede wildlife movement across the property. There is no aquatic fish habitat on site.

Significance Level:

Less than Significant Impact

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

Comment:

The project site is not located within an area identified by General Plan policies or ordinances protecting biological resources such as Valley Oak protection or Oak Woodland protection. No trees will be removed as a result of this project.

Significance Level:

No Impact

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

Comment:

Habitat Conservation Plans and Natural Community Conservation Plans are site-specific plans to address effects on sensitive species of plants and animals. The project site is located within the regulatory Santa Rosa Plain. However as described in 4a above, the project does not conflict with conservation goals for the Santa Rosa Plain, as it does not involve any new construction or conversion of habitat.

Significance Level:

No Impact

5. CULTURAL RESOURCES:

Would the project:

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

Comment:

The project site has a combining zoning designation of HD (Historic Combining District). This relates to the existing main residence. It is designated # 102 on Historic Resources Inventory because of the age of the structure and the Queen Anne elegance style of farmhouse. The farmhouse has highly decorated gables, porch and turret. At that time, it was unusual to have such design and elegance for farm buildings. The farmhouse and the other structures on the parcel has been modified over the years however the proposed project will not involve any new construction or exterior changes to the existing structures. Therefore, the project will not cause substantial adverse change in the significant of a historic resource.

The project was referred to the Sonoma County Landmarks Committee; no comments or concerns were received.

Significance Level:

Less than Significant Impact

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

Comment:

There are no known archaeological resources on or near the project site. The project does not include any new construction or ground disturbance that could disturb undiscovered buried archaeological resources. Therefore, no impacts to archaeological resources are anticipated.

Significance Level:

Less than significant Impact

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

Comment:

No burial sites are known in the vicinity of the project, and most of the project site has already been disturbed by past construction. No new construction is proposed.

Significance Level:

Less than Significant Impact

6. ENERGY

Would the project:

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

Comment:

The project will not result in significant environmental impact due to wasteful, inefficient or unnecessary consumption of energy resources, during construction or operation because no new construction is proposed. Some extra lighting and heating energy will be used to host events however this extra will not substantially increase electricity consumption relative to the existing structures.

Significance Level:

Less than Significant Impact

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

Comment:

As noted above no new construction is proposed as part of this project. All existing structures will continue to comply with Building Code Energy Efficiency Standards.

Significance Level:

Less than Significant Impacts

7. GEOLOGY AND SOILS:

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.**

Existing geologic conditions that could affect new development are considered in this analysis. Impacts of the environment on the project are analyzed as a matter of County policy and not because such analysis is required by CEQA.

Comment:

The project site is not located in an Alquist-Priolo fault zone or on a know fault based on the Safety Maps in the Sonoma County General Plan. The Uniform Building Code has been developed to address seismic events in California and development which complies with the code will result in buildings which should withstand the most severe reasonably anticipated seismic event. No new construction is proposed as part of this project.

Significance Level:

Less than Significant Impact

ii. Strong seismic ground shaking?

Comment:

All of Sonoma County is subject to seismic shaking that would result from earthquakes along the San Andreas, Healdsburg-Rodgers Creek, and other faults. By applying geotechnical evaluations techniques and appropriate engineering practices, potential injury and damage from seismic activity can be diminished, thereby exposing fewer people and less property to the effects of a major damaging earthquake. The design and construction of new structures are subject to engineering standards of the California Building Code, which takes into account soil properties, seismic shaking and foundation types. No new construction is proposed as part of this project.

Significance Level:

Less than Significant Impact

iii. Seismic-related ground failure, including liquefaction?

Comment:

Strong ground shaking can result in liquefaction, the sudden loss of shear strength in saturated sandy material, resulting ground failure. Area of Sonoma County most at risk of liquefaction are along the San Pablo Bay and in alluvial valleys. The subject site is not identified on the Safety Element Map as

Vey High, High or Medium Liquefaction hazard Area.

Significance Level:
Less than Significant Impact

iv. Landslides?

Comment:
Steep slopes characterized much of Sonoma County, particularly the northern end and eastern portions of the county. Where these areas are underlain by weak or unconsolidated earth materials landslides are a hazard. The project site is not located in, and area identified on the Safety Element map as an area subject to landslides.

Significance Level:
Less than Significant Impact

b) Result in substantial soil erosion or the loss of topsoil?

Comment:
The project does not include grading, cuts and fills therefore there will be no soil erosion or loss of topsoil.

Significance Level:
No Impact

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?

Comment:
The project site is subject to seismic shaking and other geologic hazards as described in item 6. a.ii, iii, and iv, above.

Significance Level:
Less than Significant Impact

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

Comment:
The project does not involve new construction or grading.

Significance Level:
No Impact.

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

Comment:
The project site is not located in an area served by public sewer and has a compliant on-site septic system and required expansion area.

Significance Level:

No Impact

- f) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

Comment:

The project site has not been identified as having unique paleontological resources or unique geologic features.

Significance Level:

No Impact

8. GREENHOUSE GAS EMISSIONS:

Would the project:

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

Comment:

Section 15064.4 of the State CEQA Guidelines assists lead agencies in determining the significance of the impacts of GHG emissions. Section 15064.4 gives lead agencies the discretion to assess emissions quantitatively or qualitatively. The CEQA Guidelines do not establish a threshold of significance. Lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or other experts, so long as any threshold chosen is supported by substantial evidence.

The Bay Area Air Quality Management District's (BAAQMD) *2022 Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects* acknowledges that evaluating climate impacts under CEQA can be challenging because global climate change is inherently a cumulative problem, rather than the result of a single source of greenhouse gas (GHG) emissions. With that in mind, the BAAQMD has recommended thresholds of significance as to whether a proposed project would have a "cumulatively considerable" contribution to the significant cumulative impact on climate change.

For land use development projects, the BAAQMD recommends using an approach which evaluates a project based on its effect on California's efforts to meet the State's long-term climate goals. Using this approach, a project that is consistent with and would contribute its "fair share" towards achieving those long-term climate goals can be found to have a less-than-significant impact on climate change under CEQA because the project would, in effect, help to solve the problem of global climate change. Applying this approach, the Air District has analyzed what will be required of new land use development projects to achieve California's long-term climate goal of carbon neutrality by 2045.

Because GHG emissions from the land use sector come primarily from building energy use and from transportation, these are the areas that the BAAQMD evaluated to ensure that a project can and will do its fair share to achieve carbon neutrality. With respect to building energy use, the BAAQMD recommends replacing natural gas with electric power and eliminating inefficient or wasteful energy usage. This will support California's transition away from fossil fuel-based energy sources and will bring a project's GHG emissions associated with building energy use down to zero as the state's electric supply becomes 100 percent carbon free. With respect to transportation, the BAAQMD recommends that projects be designed to reduce project-generated Vehicle Miles Travelled (VMT) and to provide sufficient electric vehicle (EV) charging infrastructure to support a shift to EVs over time.

The BAAQMB has found, based on this analysis, that a new land use development project being built today either must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b), or must incorporate the following design elements to achieve its “fair share” of implementing the goal of carbon neutrality by 2045:

- A. Projects must include, at a minimum, the following project design elements:
1. Buildings
 - a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
 - b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
 2. Transportation
 - a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor’s Office of Planning and Research’s (OPR) 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA:
 - i. Residential projects: 15 percent below the existing VMT per capita
 - ii. Office projects: 15 percent below the existing VMT per employee
 - iii. Retail projects: no net increase in existing VMT
 - b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

There is currently no applicable local GHG reduction strategy, such as an adopted Climate Action Plan, for Sonoma County.

The proposed project will not involve new construction and therefore will not include new natural gas appliances or plumbing.

The project does not include new residences or office buildings. However, retail and visitor-serving uses are proposed within existing structures and outdoor garden areas. As discussed in the Transportation Section 17b, VMT refers to the amount and distance of automobile travel attributable to a project. The County of Sonoma has not yet adopted specific VMT policies or thresholds of significance. However, the OPR Technical Advisory includes a screening threshold for small projects that generate or attract fewer than 110 trips per day, stating this level of vehicle activity may generally be assumed to result in a less than significant transportation impact. The maximum average daily vehicle trips associated with the project is 60, well below the threshold.

Because the project does not propose the installation of natural gas, would use minimal energy, does not include new residential or office uses, and would generate low VMT associated with proposed retail and visitor-serving uses, the project will contribute its “fair share” towards achieving the State’s long term climate goals, and therefore, would have a less-than-significant impact on climate change.

Significance Level:

Less than Significant Impact

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

Comment:

The County does not have an adopted Climate Action Plan but has adopted a Climate Change Action Resolution (May 8, 2018) which 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.

All new development is required to evaluate and implement all reasonably feasible measures to reduce greenhouse gas emissions and enhance carbon sequestration. The proposed project will comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in AB 32. The proposed project does not include new development and would not conflict with applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Significance Level:

Less than Significant Impact

9. HAZARDS AND HAZARDOUS MATERIALS:

Would the project:

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

Comment:

The proposed project is a use permit to allow events which does not involve new construction or propose the use of hazardous materials. The use will not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.

Significance Level:

No Impact

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

Comment:

The proposed project will not create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. No new construction is proposed.

Significance Level:

No Impact

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

Comment:

There are no schools within one-quarter mile of the project area. The nearest school, Liberty Elementary School, is over one mile to the south of the project parcel.

Significance Level:

No Impact

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

Comment:

The project site is not identified on, or in the vicinity of any parcels on lists compiled by the California Environmental Protection Agency, Regional Water Quality Board, California Department of Toxic Substances Control, and the CalRecycle Waste Management Board Solid Development Waste

Information System (SWIS). The project area is not included on the list of hazardous materials sites complied pursuant to Government Code Section 65962.5

Significance Level:

No Impact

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

Comment:

The site is not located within the Airport Referral Area as designated by the Sonoma County Comprehensive Airport Land Use Plan (ALUC).

Significance Level:

No Impact

- f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Comment:

The project will not impair implementation of, or physically interfere with the County's adopted emergency operations plan. There is no separate emergency evacuation plan for the County. In any case the project would not change existing circulation patterns significantly and would have no effect on emergency response routes.

Significance Level:

No Impact

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

Comment:

According to the Safety Element of the General Plan, the project site is not located in a high wildland fire hazard area. The proposed project will not include the construction of new structures. Standard conditions of approval include that the facility operator shall develop an emergency response plan consistent with Chapter 4 of the 2013 California Fire Code with safety plans, emergency procedures, and employee training programs; shall provide for safe access for emergency fire apparatus and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during an emergency; shall provide emergency water supply for fire protection and establish defensible space. All of the fire safe conditions of approval will ensure that the project will reduce the exposure of people and property to fire hazards to a degree the risk of injury or damage is less than significant. The project will not expose people to significant risk from wildland fires.

Significance Level:

Less than Significant Impact

10. HYDROLOGY AND WATER QUALITY:

Would the project:

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

Comment:

The proposed project is not located in an area served by public sewer and contains a compliant on-site septic system therefore the project will not violate water quality standards or waste discharge requirements. No new construction is proposed as part of this project.

Significance Level:

No Impact

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

Comment:

The project is located within the Petaluma Groundwater Basin. A Zero Net Use Increase Report was prepared by O'Connor Environmental, Inc to document that the proposed project will not result in a net increase in groundwater use.

Significance Level:

No Impact

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. result in substantial erosion or siltation on- or off-site?

Comment:

The proposed project will not require new construction or grading and as a result there will be no substantial erosion or siltation on-or off site.

Significance Level:

No Impact

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Comment:

The proposed project will not involve new construction or grading therefore the increase of the rate or amount of surface runoff will not increase.

Significance Level:

No Impact

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Comment:

The proposed project will not involve new construction or grading and therefore will not create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Significance Level:

No Impact

iv. Impede or redirect flood flows?

Comment:

The proposed project will not involve new constriction and therefore will not impede or redirect flood flows.

Significance Level:

No Impact

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

Comment:

The County used FEMA Flood Insurance Rate Maps to map flood hazard areas in the General Plan 2020. According to Figure PS-1e of the General Plan the proposed project site is outside of the 100-year Flood Hazard Area. The project site is not located in an area subject to seiche or tsunami.

Significance Level:

Less than Significant Impact

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

Comment:

The project does not involve new construction and will not result in a net increase in groundwater use.

Significance Level:

Less than Significant Impact

11. LAND USE AND PLANNING:

Would the project:

a) Physically divide an established community?

Comment:

The proposed project will not physically divide an established community. It does not involve construction of a physical structure (such as a major transportation facility) or removal of a primary access route (such as a road or a bridge) that would impair mobility within an established community or between a community and outlying area.

Significance Level:

No Impact

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

Comment:

The project would not conflict with any applicable land use plan or policies related uses in agricultural zones, these plans and policies are adopted for the purpose of avoiding or mitigating an environmental effect, including in the Sonoma County General Plan and zoning ordinance.

Significance Level:
Less than Significant Impact

12. MINERAL RESOURCES:

Would the project:

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

Comment:

The project site is not located within a known mineral resource deposit area (Sonoma County Aggregate Resources Management Plan, as amended 2010). Sonoma County has adopted the Aggregate Resources Management Plan that identifies aggregate resources of statewide or regional significance (areas classified as MRZ-2 by the State Geologist). Consult California Geologic Survey Special Report 205, Update of Mineral Land Classification: Aggregate Materials in the North San Francisco Bay Production-consumption region, Sonoma, Napa, Marin, and Southwestern Solano Counties, California (California Geological Survey, 2013).

Significance Level:
No Impact

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

Comment:

The project site is not located within an area of locally-important mineral resource recovery site and the site is not zoned MR (Mineral Resources) (Sonoma County Aggregate Resources Management Plan, as amended 2010 and Sonoma County Zoning Code). No locally-important mineral resources are known to occur at the site.

Significance Level:
No Impact

13. NOISE:

Would the project:

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

Comment:

A Noise and Vibration Assessment was prepared by Illingworth & Rodkin, Inc. dated March 18, 2020 (Attachment 4). The report summarized noise attributable to the proposed project in the project vicinity and found that the primary noise sources associated with the project will be vehicle traffic, parking and on-site vehicle circulation, and events.

The study concluded that project operations would comply with and not exceed Sonoma County noise standards.

Significance Level:
Less than Significant Impact

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

Comment:

The proposed project does not involve new construction therefore no groundborne vibration or groundborne noise is expected.

Significance Level:

No Impact

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

Comment:

The site is not within an airport land use plan as designated by Sonoma County.

Significance Level:

No Impact

14. POPULATION AND HOUSING:

Would the project:

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

Comment:

The project will not include construction of any homes or new business facilities, nor will it generate significant new demand for housing in the area. The project will not generate employees as all event staff will be provided by 3rd party caterers. No new infrastructure is proposed. Therefore, the project would not induce substantial population growth.

Significance Level:

Less than Significant Impact

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

Comment:

No housing will be displaced by the project and no replacement housing is proposed to be constructed.

Significance Level:

No Impact

15. PUBLIC SERVICES:

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 rations, response times or other performance objectives for any of the public services:**

Comment:

The proposed project does not propose new housing, nor would it generate significant new demand for housing in the area (no full-time employees are proposed). Therefore, the project would not necessitate or facilitate construction of new public facilities.

Significance Level:

No Impact

i. Fire protection?

Comment:

Sonoma County Code requires that all new development meet Fire Safe Standards (Chapter 13). The County Fire Marshal reviewed the project description and requires that the project comply with Fire Safe Standards. This is a standard condition of approval and required by county code and impacts would be less than significant. Fire protection services will continue to be provided by the Rancho Adobe Fire District.

The proposed project does not propose new housing, nor would it generate significant new demand for housing in the area because no full-time employees are proposed. Therefore, the project would not necessitate additional fire protection.

Significance Level:

Less than Significant Impact

ii. Police?

Comment:

The Sonoma County Sheriff would continue to serve this area; existing sheriff protection facilities are anticipated to be adequate. The proposed project does not propose new housing. No new job opportunities are anticipated since the project will not have new full-time employees and would not be result in number of new residents moving to the area and requiring police protection. Therefore, the project would not necessitate or facilitate construction of new police protection facilities resulting in environmental impacts in order to maintain acceptable service ratios or response times.

Significance Level:

Less than Significant Impact

iii. Schools?

Comment:

Development fees to offset potential impacts to public services, including school fees, are required by Sonoma County Code and state law for new subdivisions and residential developments. The project does not involve residential development, and no new job opportunities will be generated as a result of this project. Therefore, the project would not necessitate or facilitate construction of new schools resulting in environmental impacts.

Significance Level:

Less than Significant Impact

iv. Parks?

Comment:

Development fees to offset potential impacts to public services, including parks fees, are required by Sonoma County Code and state law for new subdivisions and residential developments. The project does not involve residential development, and no new job opportunities that would require new residents to move into the area and requiring additional park facilities. Therefore, the project would not necessitate or facilitate construction of new parks resulting in environmental impacts.

Significance Level:

Less than Significant Impact

v. Other public facilities?

Comment:

The project would not be served by public sewer or water facilities. No other public facilities are anticipated to be required as a result of the project.

Significance Level:

No Impact

16. RECREATION:

Would the project:

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

Comment:

The proposed project would not involve activities that would cause or accelerate substantial physical deterioration of parks or recreational facilities. The project will have no impact on the use of existing neighborhood and regional parks or other recreational facilities.

Significance Level:

No Impact

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

Comment:

The project does not include a recreational facility and is of a project -type that does not require construction or expansion of a recreation facility.

Significance Level:

No Impact

17. TRANSPORTATION:

Would the project:

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

Comment:

The applicant submitted a draft Traffic Study dated February 25, 2020, after peer review by Sonoma County Public Infrastructure a Final Traffic Study was submitted and accepted March 6, 2020. The traffic study findings and recommendations are as follows:

- During the largest proposed 150-guest event, the project is estimated to generate 136 daily trips; such events would generate either 60 trips during the weekday p.m. peak hour or 60 trips during the weekend peak hour.
- Under existing conditions, the segment of Pepper Road fronting the project site is operating acceptably at LOS A or B during all three peak hours evaluated.
- During the five-year period evaluated, the study segment experienced a collision rate lower than the statewide average for similar facilities.
- Based on growth rates developed from the County traffic model, the study segment of Pepper Road is expected to continue operating acceptably at LOS A during both a.m. and p.m. weekday peak periods and weekend peak hours evaluated under projected Future (2040) volumes.
- Sight distances at the existing driveways extend more than 500 feet in each direction, which is adequate for required sight lines. To maintain adequate sight distance, it is recommended that any existing or planned landscaping and signage be placed outside the driver's vision triangle.
- On-site circulation for emergency vehicles to maneuver in and out of the site would be adequate.
- Existing and planned bicycle facilities within the project vicinity are adequate to meet anticipated demand. It is recommended that the applicant work with County staff to ensure that there is adequate right-of-way along the project frontage on Pepper Road for the planned bicycle lane.
- Lack of pedestrian and transit facilities serving the site is acceptable given the rural location.
- The proposed parking supply of 112 spaces would accommodate the anticipated parking demand for the largest event, with a surplus of 44 parking spaces. It is recommended that the applicant include 14 bicycle parking spaces on-site based on the projected demand during the largest event.

The study concluded that there would be no significant increases in traffic levels or impacts to the local traffic circulation system.

The General Plan and Countywide Bicycle and Pedestrian Master Plan identify Pepper Road as a proposed Class III bikeway (cyclists share the road with motor vehicles) in the project area. The project will not result in new traffic by large trucks that could result in increased safety hazard for cyclists riding on Pepper Road. The project does not propose new construction in or near the right of way which could interfere with future road widening to accommodate wider road shoulders (a minimum 4-foot-wide shoulder is recommended for Class III bikeways), and therefore, would not conflict with proposed bicycle facilities. Fourteen on-site bicycle spaces will be required by the project's Condition of Approval, Pedestrian sidewalks are absent along the entire property road frontage, and throughout the area, due to the rural nature of the area and lack of residential neighborhoods and commercial services which might attract pedestrians. No pedestrian facilities on Pepper Road are planned or warranted.

There are no existing or proposed transit routes or facilities along Pepper Road.

The project does not conflict with traffic-related programs, plans, ordinances, or policies.

Significance Level:

Less than Significant Impact

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

Senate Bill (SB) 743 established the change in vehicle miles traveled (VMT) as the metric to be applied to determining transportation impacts associated with development projects. As of the date of this analysis, Sonoma County has not yet adopted thresholds of significance related to VMT. As a result, project-related VMT impacts were assessed based on guidance published by the California Governor's Office of Planning and Research (OPR) in the publication Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory, 2018. The OPR guidelines identify several criteria that may be used by jurisdictions to identify certain types of projects that are unlikely to have a significant VMT impact and can be "screened" from further analysis. One of these screening criteria pertains to "small projects," which OPR identifies as generating fewer than 110 new vehicle trips per typical weekday. During the largest event, the project is estimated to generate up to 136 trips on the event day, but the project average daily trips, calculated by averaging all trips generation over the year is only 60 average daily trips, which falls well below the OPR threshold of 110 daily trips. As a result, it is reasonable to conclude that the project would have a less-than-significant impact on VMT.

Accordingly, the project is expected to have a less-than-significant impact on VMT for both employment and patron-related travel.

Significance Level:

Less than Significant Impact

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

The project will not increase hazards since it maintains the existing alignment of the roadway. All project activities would occur in the parcel interior. The project does not include changes to current farming practices or involve the use of farm equipment on the public roadway.

Significance Level:

No Impact

d) Result in inadequate emergency access?Comment:

Development on the site must comply with all emergency access requirements of the Sonoma County Fire Safety Code (Sonoma County Code Chapter 13), including emergency vehicle access requirements. Project development plans are required to be reviewed by a Department of Fire and Emergency services Fire Inspector during the building permit process to ensure compliance with emergency access issues.

As part of the Traffic Study emergency access within the site was reviewed. While the main access to the site would be via the "Eastside Access Road," there is also an additional access road to the west, "Westside Road" that also serves the site.

Emergency vehicle access to and within the project site was review using AutoTURN and the most recent available aerals. Based on the review, fire trucks, the largest of the expected emergency vehicles, would be able to navigate around the site through either access road and turn around internally in the parking area.

Significance Level:

Less than Significant Impact

18. TRIBAL CULTURAL RESOURCES:

State Regulations

CEQA requires that a lead agency determine whether a project could have a significant effect on historical resources and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). A historical resource is one listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR, PRC Section 21084.1), a resource included in a local register of historical resources (PRC Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (PRC Section 15064.5[a][3]).

If a project can be demonstrated to cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to permit any or all these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC, Section 21083.2[a], [b], and [c]).

Impacts to significant cultural resources that affect the characteristics of any resource that qualify it for the NRHP or adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. These impacts could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired (*CEQA Guidelines* Section 15064.5 [b][1]). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of an historical resource that convey its historical significance and that justify its inclusion or eligibility for inclusion in the CRHR (*CEQA Guidelines* Section 15064.5[b][2][A]).

California Public Resources Code

Section 5097.5 of the California PRC states:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

As used in this PRC section, "public lands" means lands owned by or under the jurisdiction of the State or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, local agencies are required to comply with PRC 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others.

Codes Governing Human Remains

The disposition of human remains is governed by Health and Safety Code Section 7050.5 and PRC sections 5097.94 and 5097.98 and falls within the jurisdiction of the Native American Heritage Commission (NAHC). If human remains are discovered, the county coroner must be notified within 48 hours, and there should be no further disturbance to the site where the remains were found. If the coroner determines the remains are Native American, the coroner is responsible to contact the NAHC within 24 hours. Pursuant to PRC Section 5097.98, the NAHC will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

Would the project:

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

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or ii) A resource determined by the lead agency. In its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Comment:

On December 14, 2017, Assembly Bill 52 Project Notifications were sent to the Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria Band of Pomo Indians, Torres Martinez Desert Cahuilla Indians, Mishewal Wappo Tribe of Alexander Valley, Middletown Rancheria Band of Pomo Indians, Lytton Rancheria of California, Kashia Pomos Stewarts Point Rancheria and Federated Indians of Graton Rancheria. These Native American tribes were invited to consult on the project pursuant to Public Resources Code sections 21080.3.1 and 21080.3.2. No requests for consultation were received.

There are no known archaeological resources on or near the project site. The project does not include any new construction or ground disturbance that could disturb undiscovered buried archaeological resources. Therefore, no impacts to archaeological resources are anticipated.

Significance Level:

No Impact

19. UTILITIES AND SERVICE SYSTEMS:

Would the project:

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

Comment:

The project will not contribute to the need for construction of new water or wastewater treatment facilities. The existing septic system has been deemed adequate to serve the proposed project.

No new natural gas connections are proposed for this project. The proposed project will continue to be served by PG&E.

Significance Level:

Less than Significant Impact

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

Comment:

The project is not located in a water scare area, nor within a priority basin. Sufficient water will provide by on-site wells which are located in a Class 1 basin. The project will have sufficient water supplies available to serve the project for the reasonably foreseeable future during normal, dry and multiple dry years.

Significance Level:

Less than Significant Impact

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

Comment:

The domestic wastewater system for the site is sized in accordance with the County of Sonoma OWTS Manual. The onsite septic will have sufficient capacity to treat the daily demand generated by the proposed project.

Significance Level:

Less than Significant Impact

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

Comment:

Solid waste generated by the project will be minimal and will not be more than the capacity of local infrastructure. The project will comply with all policies, ordinances and regulations related to solid waste diversion. The project will not impair the attainment of solid waste reduction or diversion goals.

Significance Level:

Less than Significant Impact

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

Comment:

Sonoma County has access to adequate permitted landfill capacity to serve the proposed project.

Significance Level:

No Impact

20. WILDFIRE

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

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?**

Comment:

The project would not impair implementation of an adopted emergency response plan. There is no adopted emergency evacuation plan for the County, and the project would not change existing circulation patterns or effect emergency response routes.

Significance Level: Less than Significant Impact

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

Comment:

According to the Safety Element of the General Plan, the project site is located in the State Responsibility Area but is not located in or near a high or very high wildland fire hazard area. The project site is flat therefore will not expose project occupants to risk due to slope or prevailing winds from wildfire or uncontrolled spread of wildfire. There is no significant forested or chaparral wildland vegetation, which carries wildfire, in the vicinity. The project and surrounding areas are primarily composed of pastureland and residential development. No new construction is associated with this project; however, project conditions of approval require the project to comply with the requirements of the 2013 California Fire Code and Sonoma County Code. See section 9.g above for additional conditions of approval to reduce risk of injury or damage from wildfire.

The project would have a less than significant impact regarding exposing 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 of that may result in temporary or ongoing impacts to the environment?**

Comment

The project does not propose infrastructure improvements and is not anticipated to exacerbate fire risk or result in temporary or ongoing environmental impacts related to fire-fighting infrastructure.

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

Comment:

There are no streams, drainage channels, or wetland features on the project site and the parcel is not in the 100-year flood plain or in an area prone to flooding. Because the project does not involve new construction, the project would not substantially alter drainage patterns or increase runoff which would expose people or structures to significant downslope flooding.

The project site is located in a valley flatland and is not located within a deep-seated landslide hazard area or on a mapped landslide complex or debris flow source area. It is unlikely that a landslide would occur on-site as a result of runoff, post-fire slope instability, or drainage changes. Therefore, it is not anticipated that the project would expose people or structures to significant risks including flooding or landslides as a result of runoff, post-fire instability, or drainage changes.

Significance Level:

Less than Significant Impact

21. MANDATORY FINDINGS OF SIGNIFICANCE

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

Comment:

Evaluation of potential biological resources in Section 4 and cultural resources in Section 5 determined that none exist, and no impacts would occur.

Significance Level:

No Impact

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

Comment:

Section 15355 of the CEQA Guidelines state: Cumulative impacts refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. A search was undertaken to identify reasonably foreseeable projects in the vicinity of the proposed project area that might have overlapping or cumulative impacts. No other proposed recreational or visitor-serving projects were identified within the vicinity.

The combined project contributions are not anticipated to rise to a cumulatively considerable level.

Significance Level:

Less than Significant Impact

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

Comment:

The project will not result in any significant changes to the existing environment. Based on the discussion and information provided in this document the project will not cause substantial adverse effects on human beings, either directly or indirectly.

Significance Level:

Less than Significant Impact

Attachment

1. Project Site plan
2. Traffic Study for the Garden Valley Ranch, dated March 5, 2020
3. Zero Net Use Increase Report, dated September 5, 2019
4. Noise and Vibration Assessment, dated March 18, 2020
5. Water Conservation Plan, dated September 16, 2019