MONTALDO APARTMENTS PROJECT

Draft Environmental Impact Report

City of Sonoma

May 2025

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S. EXECUTIVE SUMMARY

S.1 Introduction

This document is a draft environmental impact report (EIR) for the proposed Montaldo Apartments Project (proposed project). This chapter provides a summary of the project; anticipated environmental impacts of the project and mitigation measures, areas of controversy to be resolved, and alternatives, including the environmentally superior alternative.

S.2 Project Description

The project site is located at 19320 Sonoma Highway in the City of Sonoma (City), approximately 1 mile northwest of Sonoma Plaza, bounded by State Route (SR) 12 to the west, the Olde Bowl commercial center to the north, single-family dwellings to the east, and a multi-family residential complex to the south.

The project applicant (DeNova Homes) proposes to construct the Montaldo Apartments Project, which includes the demolition of the existing single-family residence and the development of 50 apartment units in seven residential buildings, including 2 two-story buildings and 5 three-story buildings. The proposed project would provide a total of 89 parking spaces with 68 garage stalls, 3 carports, and 18 open parking spaces. All apartment homes would have a minimum of two bedrooms and two baths.

S.3 Summary of Project Impacts and Mitigation Measures

The Initial Study that is part of this EIR determined that the following topics would have either no significant impacts or impacts that would be reduced to less than significant with mitigation: aesthetics, agriculture and forestry resources, air quality, archaeological resources and human remains, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, transportation, tribal cultural resources, utilities and service systems, and wildfire. Discussion and analysis of impacts for these resource topics are presented in **Appendix A**.

Chapter III, Environmental Settings, Impacts, and Mitigation Measures of this EIR presents detailed environmental impact analysis for cultural resources. The impact analysis describes the environmental setting, identifies significance criteria used in the analysis, evaluates potential physical effects of the project on both a project-level and cumulative basis, and provides feasible mitigation measures that would reduce the severity of significant impacts.

Table S-1 summarizes (1) impact descriptions, (2) level of significance prior to mitigation measures, (3) mitigation measures (if applicable), and (4) level of significance after mitigation (if applicable). The summary table includes all impacts and mitigation measures applicable to the project, with the EIR sections presented first, followed by the Initial Study sections.

This EIR determined the project would result in significant and unavoidable impacts with mitigation on historical resources for the following reasons:

- **Historical Resources**. A single-family residence (Montaldo House) is eligible for listing in the California Register. The project would demolish the historical resource (Impact CR-1).

The Initial Study identified significant impacts that could be mitigated to a less-than-significant levels with implementation of identified mitigation measures for the following topics:

Air Quality. During construction, the proposed project would temporarily affect air quality due to the release of particulate matter emissions (i.e., fugitive dust) generated by grading, hauling, and other activities. The proposed project would be required to implement **Mitigation Measures AIR-2: Basic Construction Management Practices** and **AIR-3: Construction Equipment with Low Diesel Particular Matter Exhaust Emissions**, which would reduce project impact on air quality to a less-than-significant level.

- **Biological Resources**. Project construction could adversely affect the pallid bat, the crotch's bumble bee, the western bumble bee, special-status birds and other nesting birds, and may conflict with local policies or ordinances protecting biological resources. The proposed project would be required to implement **Mitigation Measure BIO-1a: Special-Status Bat Species, BIO-1b: Special-Status Bumble Bees, BIO-1c: Nesting Birds, and BIO-5: Tree Protection Plan**, which would reduce project impact on biological resources to a less-than-significant level.

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

- **Paleontological Resources**. Project construction would involve excavation, which could damage or destroy potential paleontological resources. The proposed project would be required to implement **Mitigation Measure GEO-6: Implement Appropriate Measures in Case of Inadvertent Discovery of Paleontological Resources**, which would reduce project impact on paleontological resources to a less-than-significant level.

- **Noise**. Demolition and construction activities, including grading, excavation, paving, material deliveries, and building construction, would result in temporary noise in the project area, exposing adjacent sensitive receptors to increased noise levels. The proposed project would be required to implement **Mitigation Measure NOI-1: Construction Noise**, which would reduce project noise impact to a less-than-significant level.

- **Transportation**. Roadside structures or landscaping could obstruct the line of sight at the proposed project's driveway access on SR-12. The proposed project would be required to implement **Mitigation Measure TR-3: Entryway Features**, which would reduce project impact related to traffic safety to a less-than-significant level.

Identified mitigation measures are included Table S-1 and in the respective analysis within the Initial Study in **Appendix A**.

Chapter IV, Other CEQA Issues, presents the evaluation of the growth-inducing impacts of the project and determines that the project would not have a substantial growth-inducing impact.

S.4 Alternatives to the Proposed Project

Chapter V, Alternatives, presents the California Environmental Quality Act (CEQA) alternatives analysis to identify potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified for the project while still meeting most of the project objectives. The four alternatives analyzed in this EIR are:

No Project Alternative. The No Project Alternative represents what would reasonably be expected to occur in the foreseeable future if the project were not approved. Under the No Project Alternative, no changes would be made to the project site at 19320 Sonoma Highway 12. The Montaldo House and all its associated building features would remain in their current condition. The house would remain in disrepair and construction and operation of the 50-unit apartment buildings would not occur.

Southwest Site Access Alternative. This alternative would preserve the existing single-family residence and remove the large valley oak tree located at the southwest corner of the site to provide a 20-foot-wide drive aisle to the site. In addition, to construct 50 apartment units, the common open space provided under the proposed project would be replaced by one of the residential buildings.

Onsite Relocation Alternative. The historical house would be relocated southward on the site to allow access from the north. This alternative would redevelop the project site with 50 apartment units, the common open space provided under the proposed project would be replaced by one of the residential buildings.

Partial Preservation Alternative. This alternative would demolish the small extension of the historical house along the south side and preserve the rest of the house. The project site would be developed with 50 apartment units. The common open space provided under the proposed project would be replaced by one of the residential buildings.

The City of Sonoma determined that the three alternatives (Southwest Site Access Alternative, Onsite Relocation Alternative, and Partial Preservation Alternative) are potentially feasible and adequately represent the range of alternatives required under CEQA for this project. All three alternatives would avoid the significant and unavoidable adverse impact to the historical resource that was identified for the project. A “no project alternative” is included, as required by CEQA, although it would not meet the basic project objectives.

S.5 Environmentally Superior Alternative

Pursuant to CEQA Guidelines Section 15126(e)(2), an EIR is required to identify the environmentally superior alternative from among the alternatives evaluated if the project has significant impacts that cannot be mitigated to a less-than-significant level. The environmentally superior alternative is the alternative that best avoids or lessens any significant effects of the project, even if the alternative would impede, to some degree, the attainment of the project objectives.

The Onsite Relocation Alternative is the environmentally superior alternative among the project alternatives (other than the No Project Alternative). The Onsite Relocation Alternative would avoid the significant historical resource impact and would not cause any other significant

impacts. The Onsite Relocation Alternative would result in impacts comparable to or less significant than those of the proposed project. The Onsite Relocation Alternative also meets or partially meets the project objectives.

S.6 Areas of Known Controversy and Issues to be Resolved

Section 15123 of the CEQA Guidelines requires that an EIR summary identify each significant effect with proposed mitigation measures and alternatives that would reduce or avoid the effect, areas of controversy known to the lead agency including issues raised by other agencies and the public, and issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects.

On July 12, 2024, the City of Sonoma issued a Notice of Preparation (NOP) of an EIR. In accordance with Section 15082 of the CEQA Guidelines, the City of Sonoma sent the NOP to potentially interested parties, including various federal, state, regional, and local agencies, and organizations and persons who may have interest in the proposed project. The City held a scoping meeting on August 1, 2024, to solicit comments on the scope of the EIR. The NOP is included in **Appendix B** of this document.

Known controversy is primarily focused on the proposed demolition of the single-family residence. In addition, many commenters expressed concern regarding a potential increase in traffic and the protection of the large valley oak tree in the front of the property.

Table S. 1 Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
Aesthetics			
Impact AE-1: The proposed project would not have a substantial adverse effect on a scenic vista.	LTS	No mitigation required	LTS
Impact AE-2: The proposed project would not have a substantial adverse effect on scenic resources, including those within view of a state scenic highway.	LTS	No mitigation required	LTS
Impact AE-3: The proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, or conflict with applicable zoning and other regulations governing scenic quality.	LTS	No mitigation required	LTS
Impact AE-4: The proposed project would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area.	LTS	No mitigation required	LTS
Impact C-AE-1: The proposed project would not result in significant cumulative impact related to aesthetics.	LTS	No mitigation required	LTS
Agriculture and Forestry Resources			
Impact AG-1: The proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.	NI	No mitigation required	NI
Impact AG-2: The proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.	NI	No mitigation required	NI
Impact AG-3: The proposed project would not conflict with existing zoning for, or cause	NI	No mitigation required	NI

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)), or result in the loss of forest resources.			
Impact AG-4: The proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.	NI	No mitigation required	NI
Air Quality			
Impact AIR-1: The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.	LTS	No mitigation required	LTS
Impact AIR-2: The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	S	**Mitigation Measure AIR-2: Basic Construction Management Practices** The proposed project's construction applicant and contractor shall comply with the following fugitive dust control best management practices, as recommended by the BAAQMD Basic Construction Management Practices, or as modified before the time of project implementation, for reducing construction emissions of fugitive dust PM_{10} and $PM_{2.5}$: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour.	LTSM

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		• All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. • All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. • Publicly visible sign shall be posted with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.	
Impact AIR-3: The proposed project would not expose sensitive receptors to substantial pollutant concentrations.	S	**Mitigation Measure AIR-3: Construction Equipment with Low Diesel Particulate Matter Exhaust Emissions.**	LTSM

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		The project applicant will implement a feasible plan to reduce DPM emissions by 10 percent such that increased cancer risk from construction would be reduced below BAAD CEQA significance levels as follows: • All construction equipment larger than 50 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 final emission standards for PM (PM10 and PM2.5), if feasible. • Alternatively, the applicant may develop another construction operations plan demonstrating that the construction equipment used on-site would achieve a reduction in construction diesel particulate matter emissions by 10 percent or greater. Elements of the plan could include a combination of some of the following measures: ○ Installation of electric power lines during early construction phases to avoid use of diesel portable equipment, ○ Use of electrically powered equipment, ○ Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered, ○ Change in construction build-out plans to lengthen phases, and ○ Implementation of different building techniques that result in less diesel equipment usage. ○ Such a construction operations plan would be subject to review by an air quality expert and approved by the City prior to construction.	
Impact AIR-4: The proposed project would not result in other emissions (such as those	LTS	No mitigation required	LTS

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
leading to odors) adversely affecting a substantial number of people.			
Impact C-AIR-1: The proposed project, in combination with reasonably foreseeable future development, would not result in a significant cumulative air quality impact.	S	Mitigation Measure AIR-3	LTSM
Biological Resources			
Impact BIO-1: The proposed project could 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.	S	**Mitigation Measure BIO-1a: Special-Status Bat Species** In order to avoid impacts on roosting pallid bat or other special-status bats, building or tree removal shall only be conducted during seasonal periods of bat activity: between August 31 and October 15, when bats would be able to fly and feed independently, and between March 1 and April 1st to avoid hibernating bats, and prior to the formation of maternity colonies. A qualified biologist, one with at least two years of experience surveying for bats, shall conduct preconstruction surveys for roosting bats 14 days prior to starting work. If the qualified biologist finds evidence of bat presence during the surveys, then he/she shall develop a plan for removal and exclusion, in conjunction with the CDFW. If building or tree removal must occur outside of the seasonal activity periods mentioned above (i.e., between October 16 and February 28/29, or between April 2 and August 30), then a qualified biologist, one with at least two years of experience surveying for bats, shall conduct preconstruction surveys 14 days prior to starting work. If roosts are found, a determination shall be made whether there are young. If a maternity site is found, impacts to the maternity site will be avoided by establishment of a non-disturbance buffer until the young have reached independence. The size of the buffer zone shall be determined by the qualified bat biologist at the time of the surveys. If the qualified biologist finds evidence of bat presence during the surveys, then he/she shall develop a plan	LTSM

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		for removal and exclusion, when there are not dependent young present, in conjunction with the CDFW. **Mitigation Measure BIO-1b: Special-Status Bumble Bees** To minimize the take of Crotch's and western bumble bee species, a qualified entomologist shall conduct a take avoidance survey for active bumble bee colony nesting sites in any previously undisturbed area prior to the start of construction, if the work will occur during the flying season (March through August). Survey results, including negative findings, shall be submitted to the City of Sonoma prior to the start of ground-disturbing activities. Surveys shall take place during the flying season when the species is most likely to be detected above ground. The surveys shall occur when temperatures are above 60 degrees Fahrenheit (°F), on sunny days with wind speeds below 8 miles per hour, and at least 2 hours after sunrise and 3 hours before sunset as these are the best conditions to detect bumble bees. Surveyors shall conduct transect surveys focusing on detection of foraging bumble bees and underground nests using visual aids such as binoculars. At a minimum, a survey report shall provide the following: If no Crotch's or western bumble bees or potential Crotch's or western bumble bees are detected, no further mitigation is required. If potential Crotch's or western bumble bees are seen but cannot be identified, the applicant shall obtain written authorization from CDFW to use nonlethal netting methods to capture bumble bees to identify them to species. If protected bumble bee nests are found, a plan to protect bumble bee nests and individuals to ensure no take of Crotch's and western bumble bee species shall be developed by a qualified entomologist in consultation with the City of Sonoma. The City of Sonoma shall approve the plan prior to implementation. **Mitigation Measure BIO-1c: Nesting Birds** To avoid impacts on nesting birds, a nesting survey shall be conducted 15 days prior to starting construction work or tree	

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		removal if this work would commence between February 1st and August 31st. The nesting survey shall include an examination of all buildings onsite and all trees onsite and within 200 feet of the entire project site (i.e., within a zone of influence of nesting birds), not just trees slated for removal. The zone of influence includes those areas outside the project site where birds could be disturbed by earth-moving vibrations and/or other construction-related noise. If birds are identified nesting on or within the zone of influence of the construction project, a qualified biologist shall establish a temporary protective nest buffer around the nest(s). The nest buffer shall be staked with orange construction fencing. The buffer must be of sufficient size to protect the nesting site from construction-related disturbance and shall be established by a qualified ornithologist or biologist with extensive experience working with nesting birds near and on construction sites. Typically, adequate nesting buffers are 75 feet from the nest site or nest tree dripline for passerine birds and up to 300 feet for sensitive nesting birds, including raptor species known in the region of the project site. Upon completion of nesting surveys, if nesting birds are identified on or within a zone of influence of the project site, a qualified ornithologist/biologist that frequently works with nesting birds shall prescribe adequate nesting buffers to protect the nesting birds from harm while the project is constructed. No construction or earth-moving activity shall occur within any established nest protection buffer prior to September 1 unless it is determined by a qualified ornithologist/biologist that the young have fledged (that is, left the nest) and have attained sufficient flight skills to avoid project construction zones, or that the nesting cycle is otherwise completed. In the region of the project site, most species complete nesting by mid-July. This date can be significantly earlier or later and would have to be determined by the qualified biologist. At the end of the nesting cycle, fledging from the nest by its occupants, and independence from the nest tree, as determined by a qualified	

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		biologist, temporary nesting buffers may be removed, and construction may commence in established nesting buffers without further regard for the nest site.	
Impact BIO-2: The proposed project would not 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.	NI	No mitigation required	NI
Impact BIO-3: The proposed project would not 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.	NI	No mitigation required	NI
Impact BIO-4: The proposed project would not interfere 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.	LTS	No mitigation required	LTS
Impact BIO-5: The proposed project could conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	S	**Mitigation Measure BIO-5 Tree Protection Plan.** The project applicant shall retain a certified arborist to oversee the implementation of the following tree protection and tree replacement plans. Before the start of any clearing, excavation, construction, or other work on the site, every protected tree shall be securely fenced off at the non-intrusion zone. Temporary tree fencing shall be one foot of radius for each one inch of trunk diameter measured at 4.5 feet above adjacent grade. Such fences shall remain continuously in place for the duration of all work	LTSM

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		undertaken in connection with the development. Fenced areas shall not be used as a storage area or altered or disturbed except as described below: • If the proposed development, including any site work for the development, will encroach upon the non-intrusion zone of a protected tree, construction activities shall adhere to the following guidelines: • All roots encountered that are two inches or larger in diameter must be cleanly cut as they are encountered by excavating equipment. • Roots may not be ripped from the ground and then trimmed. They must be trimmed as encountered and this will require the use of a ground man working with a suitable power tool. • Pruned and exposed roots greater than two inches in diameter must be protected from desiccation if left exposed for more than 24 hours. Roots must be covered with heavy cloth, burlap, used carpeting, or similar material that has been soaked in water, until trench or excavation has been backfilled. • In the event that excavation impacts more than 20 percent of the defined non-intrusion zone, supplemental irrigation may be required to offset the loss of roots. Excavation in this case should be directed by the project arborist retained by the project applicant. • Concrete or asphalt paving shall not be placed over the root zones of protected trees. Artificial irrigation shall not occur within the root zone of oaks. • Compaction of the soil within the non-intrusion zone of protected trees shall be avoided, if possible. • Burning or use of equipment with an open flame near or within the non-intrusion zone shall be avoided. All brush, earth, and other debris shall be removed in a	

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		manner which prevents injury to the protected tree. Oil, gas, chemicals, or other substances that may be harmful to trees shall not be stored or dumped within the non-intrusion zone of any protected tree, or at any other location on the site from which such substances might enter the non-intrusion zone of a protected tree. Tree Replacement Plan. Tree replacement shall occur onsite and shall, at a minimum, occur at a 1:1 ratio and a 15-gallon box size for each six inches of tree diameter removed.	
Impact BIO-6: The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	NI	No mitigation required	NI
Impact C-BIO-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on biological resources.	LTS	No mitigation required	LTS
Cultural Resources			
Impact CR-1: The proposed project would cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5.	S	**Mitigation Measure CR-1a: Documentation of Historical Resources** Before any demolition activities within the project site, the applicant shall retain a professional who meets the Secretary of the Interior's Professional Qualification Standards for Architectural History to prepare written and photographic documentation of the Montaldo House. The documentation shall be based on the National Park Service's Historic American Building Survey (HABS). This type of documentation is based on the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation and the National Park Service's policy for photographic	SU

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		documentation, as outlined in the National Register and National Historic Landmarks Survey Photo Policy Expansion. The documentation shall include the following elements: • Accurate scaled mapping and architectural descriptions. If available, scaled architectural plans shall also be included; • Photographs in large-format (4-inch by 5-inch) black-and-white negatives and 8-inch by 10-inch enlargements. Digital photography may be substituted for large-format negative photography if archived locally; • A report containing site-specific history and appropriate contextual information. This information shall be gathered through site-specific and comparative archival research and oral history collection as appropriate; and • The applicant shall transmit such documentation to the City of Sonoma Planning Division for distribution to local libraries and/or preservation organizations. All documentation shall be scoped and then shall be reviewed and approved by the City of Sonoma before issuance of the demolition permit. **Mitigation Measure CR-1b: Interpretation** Before any demolition activities within the project site, the applicant shall retain a qualified professional to design and undertake an appropriate interpretation of the affected historical resource and its setting. The interpretation shall be conducted by a professional Architectural Historian who meets the Secretary of the Interior's Professional Qualification Standards to prepare interpretation of the historical resource. This mitigation measure would supplement the traditional HABS/HALS documentation and would enhance the collection of reference materials that would be available to the public and inform future research. The Architectural Historian will work	

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		with the City of Sonoma Planning Division and local preservation advocates to choose an appropriate format for interpretation of the historical resource. Appropriate forms of interpretation may include: a curated display for a local library or museum, a website, or a short film. The interpretation shall be reviewed and approved by the City of Sonoma prior to issuance of a demolition permit for the project. Archival copies of the documentation shall be submitted to the City of Sonoma. **Mitigation Measure CR-1c: Salvage Historic Resource** The project applicant shall give local historical societies or local architectural salvage companies the opportunity to salvage character-defining or significant features from the historical resource for public information or reuse in other locations. The project applicant shall contact local historical societies and architectural salvage companies and notify them of the available resources and make them available for removal. If, after 30 days, no organization is able and willing to salvage the significant materials, demolition can proceed.	
Impact CR-2: The proposed project could cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.	S	**Mitigation Measure CR-2a: Worker's Environmental Awareness Program (WEAP)** The project applicant shall retain an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology (National Park Service 1983) to conduct a Worker's Environmental Awareness Program (WEAP) training for all construction personnel on archaeological sensitivity prior to the commencement of any ground-disturbing activities. The WEAP training shall include a description of the types of cultural material that may be encountered, cultural sensitivity issues, the regulatory environment, and the proper protocol for treatment of the materials in the event of a find. **Mitigation Measure CR-2b: Unanticipated Archaeological Resources**	LTSM

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		In the event that archaeological resources are encountered during ground-disturbing activities, work in the immediate area shall be halted and the applicant must notify the City of Sonoma and retain an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983) to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by the project, under the direction of the City of Sonoma, the archaeologist shall determine whether additional work, such as data recovery excavation, is warranted to mitigate any significant impacts to historical resources.	
Impact CR-3: The proposed project could disturb any human remains, including those interred outside of dedicated cemeteries.	S	**Mitigation Measure CR-3: Avoid Impact to Human Remains** As described therein, if human remains are uncovered during future ground-disturbing activities, the project applicant and contractors would be required to halt potentially damaging excavation in the area of the burial and notify the County Coroner and a professional archaeologist to determine the nature of the remains. The coroner would be required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or State lands (California Health and Safety Code Section 7050.5[b]) If the coroner determines that the remains are those of a Native American, he or she must contact the NAHC by phone within 24 hours of making that determination (California Health and Safety Code Section 7050[c]). The responsibilities for acting upon notification of a discovery of Native American human remains are identified in California Public Resources Code Section 5097.9. Following the coroner's findings, the property owner, contractor or project proponent, an archaeologist, and the Most Likely Descendant designated by the Native American Heritage Commission would determine the ultimate treatment and disposition of the remains and take appropriate	LTSM

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		steps to ensure that additional human interments are not disturbed. The Most Likely Descendant would have 48 hours to complete a site inspection and make recommendations after being granted access to the site. A range of possible treatments for the remains, including nondestructive removal and analysis, preservation in place, relinquishment of the remains and associated items to the descendants, or other culturally appropriate treatment may be discussed. Public Resources Code Section 5097.9 suggests that the concerned parties may extend discussions beyond the initial 48 hours to allow for the discovery of additional remains. The following is a list of site protection measures that could be employed: 1. record the site with the NAHC and the appropriate Information Center, 2. use an open-space or conservation zoning designation or easement, and 3. record a document with the county in which the property is located. If the NAHC is unable to identify a Most Likely Descendant or the Most Likely Descendant fails to make a recommendation within 48 hours after being granted access to the site, the Native American human remains and associated grave goods would be reburied with appropriate dignity on the subject property in a location not subject to further subsurface disturbance.	
Impact C-CR-1: The proposed project, in combination with cumulative projects, could result in demolition of a historical resource, as defined in CEQA Guidelines Section 15064.5.	LTS	No mitigation required	LTS
Impact C-CR-2: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts to archaeological resources or human remains.	LTS	No mitigation required	LTS
Energy			
Impact EN-1: The proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or	LTS	No mitigation required	LTS

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
unnecessary consumption of energy resources, during project construction or operation.			
Impact EN-2: The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	LTS	No mitigation required	LTS
Impact C-EN-1: The proposed proposed project, in combination with cumulative projects, would not result in significant cumulative impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	LTS	No mitigation required	LTS
Geology and Soils			
Impact GEO-1: The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.	LTS	No mitigation required	LTS
Impact GEO-2: The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.	LTS	No mitigation required	LTS
Impact GEO-3: The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-	LTS	No mitigation required	LTS

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
related ground failure, including liquefaction or landslide.			
Impact GEO-4: The proposed project would not result in substantial soil erosion or the loss of topsoil.	LTS	No mitigation required	LTS
Impact GEO-5: The proposed project would not require the use of septic tanks or alternative wastewater disposal systems.	NA	No mitigation required	NA
Impact GEO-6: The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	S	**Mitigation Measure GEO-: Implement Appropriate Measures in Case of Inadvertent Discovery of Paleontological Resources** Before ground disturbance, the project applicant shall retain a qualified paleontologist, as defined by the Society of Vertebrate Paleontology, to instruct construction personnel involved with earthmoving activities regarding the possibility of encountering fossils, the appearance of fossils that may be unearthed during construction, and proper notification procedures should fossils be encountered. If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work in the vicinity of the resource and notify the project applicant and the City of Sonoma. There shall be no construction work in the area to allow for the recovery of the resource in a timely manner. In coordination with the City of Sonoma, the project paleontologist shall evaluate the resource and prepare a recovery plan compliant with the standards of the Society for Vertebrate Paleontology. The City of Sonoma shall determine which of the recommendations in the recovery plan are necessary and feasible, and these recommendations shall be implemented before construction activities can resume at the site where the paleontological resources were discovered. The City shall be responsible for ensuring that the qualified paleontologist's recommendations regarding treatment and reporting are implemented.	LTSM

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
Impact C-GEO-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on geology, soils, or paleontological resources.	LTS	No mitigation required	LTS
Greenhouse Gas Emissions			
Impact GHG-1: The proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	LTS	No mitigation required	LTS
Impact GHG-2: The proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	LTS	No mitigation required	LTS
Hazards and Hazardous Materials			
Impact HAZ-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	LTS	No mitigation required	LTS
Impact HAZ-2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	LTS	No mitigation required	LTS
Impact HAZ-3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	LTS	No mitigation required	LTS
Impact HAZ-4: The proposed project would not be located on a site which is included on a	NI	No mitigation required	NI

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment.			
Impact HAZ-5: The proposed project would not be located within an airport land use plan or, where such a plan has been adopted, within two miles of a public airport or public use airport and therefore the project would not result in a safety hazard or excessive noise for people residing or working in the project area.	NI	No mitigation required	NI
Impact HAZ-6: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	LTS	No mitigation required	LTS
Impact HAZ-7: The proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	LTS	No mitigation required	LTS
Impact C-HZ-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to hazards and hazardous materials.	LTS	No mitigation required	LTS
Hydrology and Water Quality			
Impact HYD-1: The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	LTS	No mitigation required	LTS
Impact HYD-2: The proposed project would not substantially decrease groundwater supplies or interfere substantially with	LTS	No mitigation required	LTS

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
groundwater recharge such that the project may impede sustainable groundwater management of the basin.			
Impact HYD-3: The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows.	LTS	No mitigation required	LTS
Impact HYD-4: The proposed project would not result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.	NI	No mitigation required	NI
Impact HYD-5: The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	NI	No mitigation required	NI
Impact C-HY-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on hydrology and water quality.	LTS	No mitigation required	LTS
Land Use and Planning			
Impact LU-1: The proposed project would not physically divide an established community.	NI	No mitigation required	NI

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
Impact LU-2: The proposed project would not 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.	LTS	No mitigation required	LTS
Impact C-LU-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to land use and planning.	LTS	No mitigation required	LTS
Mineral Resources			
Impact MIN-1: The proposed project would not result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state, or locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.	NI	No mitigation required	NI
Noise			
Impact NOI-1: The proposed project could generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	S	**Mitigation Measure NOI-1: Construction Noise** The project applicant shall develop a construction mitigation plan to reduce construction noise levels. The construction mitigation plan would include the following: All internal combustion engine-driven equipment shall be equipped with mufflers that are in good condition and appropriate for the equipment; • All unnecessary idling of internal combustion engines shall be prohibited; • Construction-related traffic to and from the project site shall be routed via designated truck routes and avoid residential streets where possible;	LTSM

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
		• As possible, "quiet" models of air compressors and other stationary noise sources shall be used; • All stationary noise-generating equipment, such as air compressors and portable power generators, shall be placed as far away as possible from adjacent residential and commercial land uses; • Adjacent sensitive uses shall be shielded from stationary equipment with individual noise barriers or partial acoustical enclosures; • Staging areas and construction material storage areas shall be located as far away as possible from adjacent land uses; • The project applicant shall designate a "disturbance coordinator" who will be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be implemented. The telephone number for the disturbance coordinator shall be included on the neighborhood notice and posted at the construction site. • The project applicant shall hold a pre-construction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise mitigation and practices (including construction hours, construction schedule, and noise coordinator) are completed.	
Impact NOI-2: The proposed project would not generate excessive groundborne vibration or groundborne noise levels.	LTS	No mitigation required	LTS

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
Impact NOI-3: The proposed project would not be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport.	NI	No mitigation required	NI
Impact C-NO-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on noise	LTS	No mitigation required	LTS
Population and Housing			
Impact POP-1: The proposed project would not induce substantial unplanned population growth in an area, either directly or indirectly.	LTS	No mitigation required	LTS
Impact POP-2: The proposed project would not displace existing people or housing.	NI	No mitigation required	NI
Impact C-POP-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to population and housing.	LTS	No mitigation required	LTS
Public Services			
Impact PS-1. The proposed project would not result in an increase in demand for fire protection, police protection, schools, or other services to an extent that would result in substantial adverse physical impacts associated with the construction or alteration of governmental facilities.	LTS	No mitigation required	LTS

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
Impact C-PS-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts on police, fire, and school district services such that new or physically altered facilities, the construction of which could cause significant environmental impacts, would be required in order to maintain acceptable levels of service	LTS	No mitigation required	LTS
Recreation			
Impact REC-1: The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or such that the project would require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	LTS	No mitigation required	LTS
Impact C-REC-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to recreation.	LTS	No mitigation required	LTS
Transportation			
Impact TR-1: The proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.	LTS	No mitigation required	LTS

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
Impact TR-2: The proposed project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).	LTS	No mitigation required	LTS
Impact TR-3: The proposed project would not substantially increase hazards due to a geometric design feature.	S	**Mitigation Measure TR-1**: **Entryway Features**. All monument signs, walls, landscaping, and other vertical features that could otherwise block visibility shall be no more than 3 feet higher than the adjacent driveway elevation in the area within 15 feet behind the back of the sidewalk and within 50 feet of the driveway edge, or as otherwise specified by the City Engineer.	LTSM
Impact TR-4: The proposed project would not result in inadequate emergency access.	LTS	No mitigation required	LTS
Impact C-TR-1: The proposed project, in combination with cumulative projects, would not result in a significant construction-related cumulative impact on transportation and circulation.	S	No mitigation required	LTSM
Tribal Cultural Resources			
Impact TCR-1: The proposed project would not result in a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074.	S	**Mitigation Measures CR-2a, CR-2b,** and **CR-3**	LTSM
Impact C-TCR-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on tribal cultural resources.	LTS	No mitigation required	LTS
Utilities and Service Systems			
Impact UT-1: The proposed project would not require or result in the relocation or	LTS	No mitigation required	LTS

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.			
Impact UT-2: The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	LTS	No mitigation required	LTS
Impact UT-3: The proposed project would not result in a determination by the wastewater treatment provider that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	LTS	No mitigation required	LTS
Impact UT-4: The proposed project would not result in significant impact related to the generation of solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	LTS	No mitigation required	LTS
Impact UT-5: The proposed project comply with federal, state, and local statutes and regulations related to solid waste.	NI	No mitigation required	NI
Impact C-UT-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on utilities and service systems.	LTS	No mitigation required	LTS

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance after Mitigation
Wildfire			
Impact WD-1: The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	LTS	No mitigation required	LTS
Impact WD-2: The proposed project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	LTS	No mitigation required	LTS
Impact WD-3: The proposed project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	LTS	No mitigation required	LTS
Impact WD-4: The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	LTS	No mitigation required	LTS
Impact C-WD-1: The proposed project would not substantially contribute to significant cumulative wildfire impact.	LTS	No mitigation required	LTS

NOTES:
SU: Significant unavoidable; *S*: Significant; *LTSM:* Less than significant with mitigation; *LTS*: Less than significant; *NI*: No impact; *NA*: Not applicable;

I. INTRODUCTION

I.1 Project Summary

The approximately 2.15-acre (approximately 93,600 square feet), combines two parcels (Sonoma County Assessor's Parcel Numbers 127-202-006 and 007) with the front parcel located at 19320 Sonoma Highway 12 (SR 12), at approximately 415 feet north of Lyon Street. The project site two parcels include a 10,000-square-foot lot fronting Sonoma Highway, developed with a single-family residence, and a rear, undeveloped lot of approximately 78,700 square feet, containing derelict livestock fencing and trees. The two parcels are zoned as Housing Opportunity (R-O) in the West Napa/Sonoma Highway Corridor Planning Area. The General Plan designates the parcels as Housing Opportunity (HO). The project site is surrounded by commercial uses to the north, single-family homes to the east, attached and single-family homes to the south, and commercial uses to the west.

The proposed project would demolish the existing single-family residence and develop the project site with 50 apartment units in two 2- and five 3- story residential buildings. The proposed project would include 13 affordable housing units, with two of the units allocated for extremely-low-income households, three of the units allocated for very-low-income households, and the remaining eight units allocated for low-income households.[1]

At the frontage along SR 12, the proposed project would preserve the large valley oak tree and include a 22-foot-wide drive aisle positioned approximately four feet of the northern property line. The proposed project would include approximately 24,164 square feet of common open space and approximately 976 square feet of private patios or decks, totaling approximately 25,140 square feet. The proposed project would provide a total of 89 parking spaces with 68 garage stalls, 3 carports, and 18 open parking spaces.

I.2 Purpose of this EIR

The purpose of this EIR is to assess the environmental effects of implementation of the proposed project and related actions. This EIR, prepared in accordance with all criteria, standards, and procedures of the California Environmental Quality Act (CEQA), as amended (California Public Resources Code Section 21000 et seq.), and the CEQA Guidelines (California Code of Regulations Title 14, Section 15000 et seq.), is a public information document for use by governmental agencies and the public to identify and evaluate potential environmental consequences of the proposed project, to recommend mitigation measures to lessen or eliminate adverse impacts, and to examine feasible alternatives to the project.

The City of Sonoma (City) is the lead agency, under whose authority this document has been prepared, in compliance with CEQA Section 21067 and CEQA Guidelines Sections 15367 and 15050-15053. CEQA requires the lead agency to avoid or substantially reduce significant environmental effects, where feasible. The lead agency has the obligation to balance a project's significant effects on the environment with its benefits, including economic, social, and other non-environmental characteristics.

CEQA requires an EIR to be prepared before a local agency makes its first discretionary decision to approve a project that may cause a significant effect on the environment that cannot

[1] Extremely low-income (ELI) households are defined as those earning up to 30% of the area median household income.
Very-low income (VLI) households are defined as those earning between 30% and 50% of the area median household income.
Low-income (LI) households are defined as those earning between 50% and 80% of the area median household income.

be mitigated. The EIR is a public information document for use by governmental agencies and the public to identify and evaluate potential environmental impacts and examine feasible alternatives to the project.

The City must consider the information in this EIR and make certain findings with respect to each significant effect identified. The decision makers will review and consider the information in this EIR, along with other information available through the public review processes, before they decide to approve, disapprove, or modify the proposed project or adopt an alternative to the proposed project. It is not the purpose of an EIR to recommend approval or denial of a project. Before it can approve the project, the City, as the lead agency and decision-making entity, must certify that this EIR was completed in compliance with CEQA, that all the information in the EIR was considered, and that the EIR reflects the City's independent judgement.

The City is required to state in writing the specific reasons for approving the project, based on information in the EIR and other information sources in the administrative record. In addition, the City must adopt a mitigation monitoring and reporting program, describing the measures that were made a condition of project approval to avoid or lessen significant effects on the environment. The mitigation monitoring and reporting program, which is adopted at the time of project approval, is designed to ensure compliance with the project description and EIR mitigation measures during and after project implementation. If the City decides to approve the project, it will be responsible for verifying that the mitigation monitoring and reporting program for this project is implemented.

I.3 Type of EIR

This document is a project-level EIR, pursuant to CEQA Guidelines Section 15161. A project-level EIR focuses on changes in the environment that would result from construction and operation of a specific project. Furthermore, this EIR is also a focused EIR, pursuant to CEQA Guidelines Section 15063(c)(3). An Initial Study was prepared for the proposed project in accordance with Sections 15062 and 15063 (See **Appendix A** of this EIR). The Initial Study is being published concurrently with this EIR, and comments will be accepted on the initial study during the public review period for the EIR. The Initial Study identifies the topics for which the proposed project would result in less than significant impacts or impacts that could be reduced to less than significant with implementation of the mitigation measures identified in the Initial Study and therefore do not require further analysis in this EIR. Therefore, this EIR focuses the environmental analysis on the topic identified in the Initial Study (Cultural Resources) with the potential to have a significant environmental impact.

I.4 CEQA Environmental Review Process

In compliance with CEQA Guidelines Sections 15080 through 15097, the EIR process includes the analysis scoping phase as described below.

Notice of Preparation of an Environmental Impact Report and Public Scoping Meeting

Consistent with the requirements of CEQA Guidelines Section 15063 and 15082, the City reached out to responsible and trustee agencies, organizations and persons who may have an interest in the proposed project, and public agencies including the Governor's Office of Planning and Research and State Clearinghouse.

This outreach effort included the circulation on July 12, 2024, of a Notice of Preparation (NOP) that an EIR would be prepared, which began a 30-day comment period that ended on August

13, 2024. The NOP requested that agencies and interested parties comment on the scope and content of the environmental information to be included in the Draft EIR. The NOP is included in **Appendix B** of this EIR.

A public scoping meeting was held by the City of Sonoma on August 1, 2024. The purpose of the meeting was to provide the public and governmental agencies with information on the proposed project and the CEQA process and to solicit further comments from the public on the scope and content of the environmental analysis to be included in the EIR.

Comments Received during Scoping Review Period

In response to the NOP, 20 comment letters were submitted to the City by public agencies and individuals. In addition, three speakers presented their comments during the public scoping meeting. Comments received during the scoping period are summarized below:

- Affordable housing and proposed number of units.
- Agricultural
    - Address project impact on agricultural lands.
- Biological Resources.
    - Trees. Large Valley Oak.
    - Forest Landscape near Sonoma Creek.
    - Increased use of open space near Sonoma Creek.
    - Endangered species and special habitats. Document special-status species and special habitats at the project site.
    - Address project impact on the loss of habitat and provide feasible mitigation measures.
    - Address cumulative impacts on biological resources.
- Historical Resources. Concerns regarding project impact related to the demolition of a historical resource.
- Hydrology and Water Quality
    - Stormwater. Maintaining stormwater discharge to pre-construction conditions.
    - Water Quality. Address project impact on water resources.
- Noise
    - Provide mitigations for construction noise impacts if needed.
- Recreation
    - Address project impact on open spaces.
- Traffic
    - Safety
    - Cumulative impacts

- Pedestrian and Bicycle Pathways

Draft EIR and Initial Study Public Review Process

Following publication of the Draft EIR and Initial Study, there will be a public review and comment period to solicit public comments on the information presented in the Draft EIR and Initial Study. The public review period is from May 12 through June 25 at 5:00 p.m..

Government agencies, interested organizations, and other members of the public are invited to submit written comments on the Draft EIR and Initial Study during the public review period. The comments should address the sufficiency of the document with respect to identifying and analyzing possible significant environmental impacts, determining how they may be avoided or mitigated, and adequacy of the alternatives evaluated to reduce significant impacts of the proposed project. All written comments about the Draft EIR and Initial Study should be addressed to:

Diane Levine
City of Sonoma
Community Development Department
No. 1 The Plaza, Sonoma, CA 95476

Final EIR and EIR Certification

Following the close of the public review and comment period of the Draft EIR, the City will prepare and publish a document titled “Responses to Comments.” This document will contain all written and oral comments received by the City on the Draft EIR and written responses to those comments. The document will also include any necessary revisions to the Draft EIR. The Draft EIR and the Responses-to-Comments document will constitute the Final EIR. No less than 10 days prior to the City’s Planning Commission hearing to consider certification of the Final EIR, the Final EIR will be made available to the public.

CEQA requires that agencies shall neither approve a project nor implement a project unless the project’s significant environmental impacts have been reduced to a less-than-significant level, thereby essentially eliminating, avoiding, or substantially lessening the potentially significant impacts of the proposed project, except when certain findings are made. If an agency approves a project that would result in the occurrence of significant adverse impacts that cannot feasibly be mitigated to less-than-significant levels, the agency must state the reasons for its action in writing, demonstrate that mitigation is infeasible based on the EIR or other information in the record, and adopt a statement of overriding considerations.

Mitigation Monitoring and Reporting Program

At the time of project approval, CEQA and the CEQA Guidelines require agencies to adopt a mitigation monitoring and reporting program and to make that program a condition of project approval, and to mitigate or avoid significant impacts on the environment in accordance with CEQA Section 21081.6 and CEQA Guidelines Section 15097. This Draft EIR identifies and presents mitigation measures that would form the basis of such a mitigation monitoring and reporting program. In addition, mitigation measures that were recommended in the Initial Study will be included in the mitigation monitoring and reporting program.

I.5 Content and Organization of this EIR

In accordance with CEQA Guidelines Sections 15120 to 15132, this Draft EIR has been organized as follows:

- **Executive Summary:** This chapter presents a summary of the Draft EIR by providing an overview of the proposed project, the environmental impacts that would result from implementation of the proposed project, mitigation measures identified to reduce or avoid these impacts, alternatives to the proposed project, and areas of controversy and issues to be resolved.
- **Chapter I, Introduction:** This chapter includes a discussion of the purpose of this EIR. It presents the environmental review process including the scoping period and the comments received on the scope of the Draft EIR, opportunities for public participation in the environmental review process, and the organization of this Draft EIR.
- **Chapter II, Project Description:** This chapter presents a detailed discussion of the location, setting, characteristics of the project site, the project objectives, the project characteristics, and required project approvals.
- **Chapter III, Environmental Setting, Impacts, and Mitigation Measures:** The environmental topic discussed in this chapter is Cultural Resources. Related to this topic, this chapter describes existing environmental setting, applicable plans and policies, an analysis of the significant environmental impacts of the proposed project, mitigation measures to minimize significant environmental effects of the proposed project. This chapter also describes the approach to analysis and presents the cumulative projects considered in this analysis.
- **Chapter IV, Other CEQA Considerations:** This chapter describes growth-inducing impacts of the proposed project, any significant and unavoidable environmental impacts of the proposed project, and any significant irreversible environmental changes that would result from implementation of the project.
- **Chapter V, Alternatives:** This chapter describes a reasonable range of alternatives to the proposed project, evaluates the extent to which those alternatives could substantially reduce the significant impacts of the proposed project while meeting most of the project objectives, and compares the effects of alternatives to those of the proposed project. As required by CEQA, a no-project-alternative is analyzed in this chapter. In addition, this chapter identifies the environmentally superior alternative and describes the alternatives considered but eliminated from further analysis.
- **Chapter VI, List of Preparers:** This chapter presents the persons involved in preparing this document.
- **Appendices:** The following appendices are included in this Draft EIR:

  Appendix A: Initial Study

  Appendix B: Notice of Preparation of an Environmental Impact and Comments Received

  Appendix C: Historical Resources Analysis and Supporting Information

Appendix D: Air Quality Analysis and Supporting Information

Appendix E: Biological Resources Analysis and Supporting Information

Appendix F: Archaeological Report

Appendix G: Traffic Impact Analysis and Associated Reports

Appendix H: Tribal Coordination (AB 52)

II. PROJECT DESCRIPTION

II.1 Project Location

The project site is located in the City of Sonoma within Sonoma County. The City is approximately 45 miles north of San Francisco and is accessible via U.S. Highway 101 and SR 12. It is centrally located within the approximately 17-mile-long Sonoma Valley. The valley is bounded by the Sonoma Mountains to the west, the Mayacamas Mountains to the east, San Pablo Bay to the south, and the City of Santa Rosa to the north. Regional location of the project site is shown in **Figure 1**.

The project site, of approximately 2.15 acres, combines two parcels (Sonoma County Assessor's Parcel Numbers 127-202-006 and 007) with the front parcel located at 19320 Sonoma Highway 12 (SR12).

The portion of the project site fronting SR 12 is developed with a single-family residence built in 1939 in the Ranch architectural style with elements of Spanish Colonial Revival design and a large valley oak tree. An approximately 2-foot fence borders the site in front of the single-family residence along Sonoma Highway. A driveway from SR 12 is located between the single-family residence and the valley oak tree. The remaining portion of the project site is undeveloped. Few trees occur sporadically throughout this portion of the site with oak trees and ornamental vegetation located along the borders. The immediate location of the project site is shown in **Figure 2**. **Figure 3** show photographs of the project site.

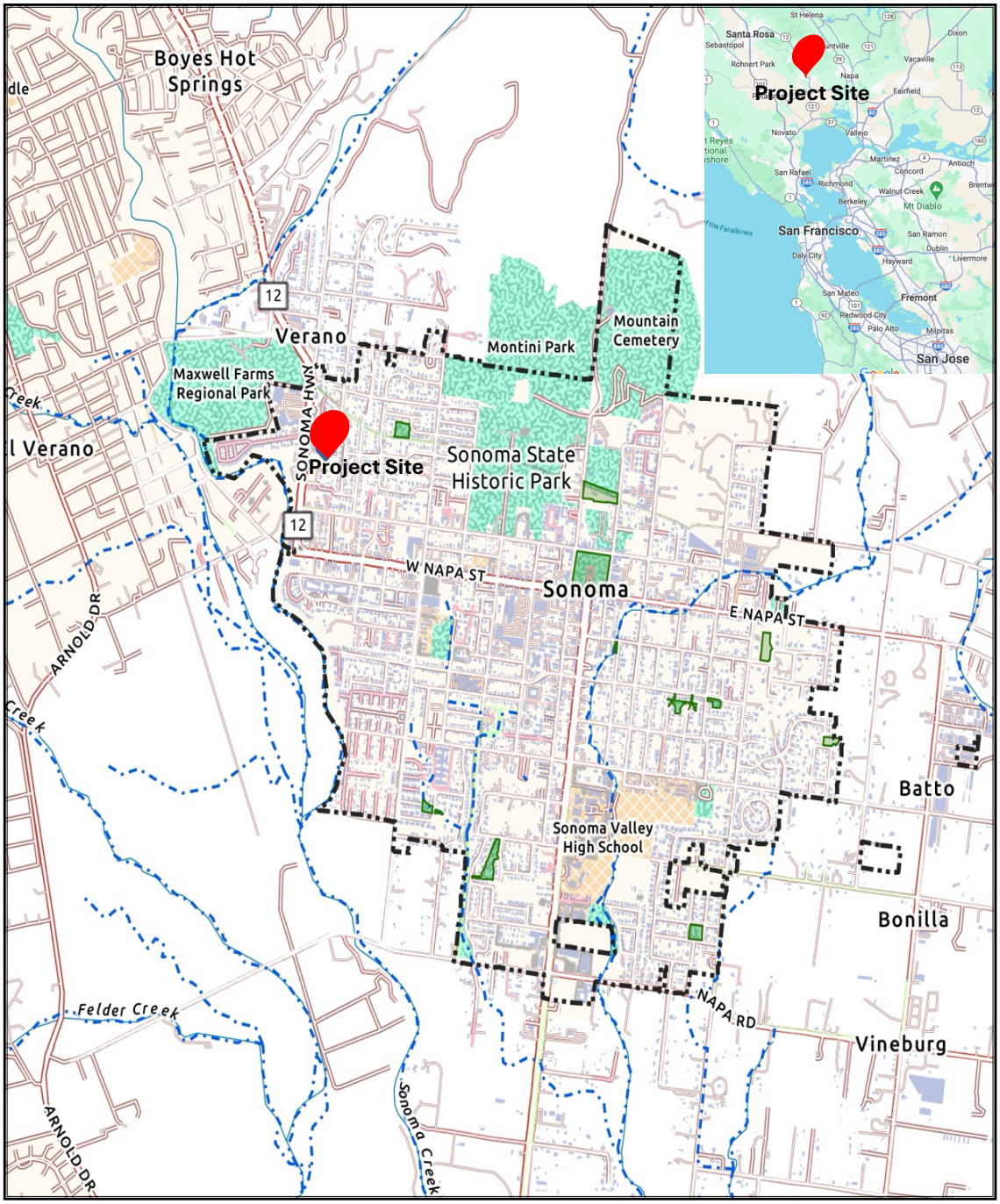
II.2 Existing and Surrounding Land Uses

The project site is surrounded by commercial uses to the north, single-family homes to the east, attached and single-family homes to the south, and commercial uses to the west.

The project site, located in the northwestern portion of the City of Sonoma, is approximately 1 mile northwest of Sonoma Plaza. The area surrounding the site is characterized by commercial, residential, and mixed uses. Commercial uses are located along SR 12. A commercial center with medical offices (Olde Bowl Center) is located to the north of the project. Two multi-tenant office buildings, a cannabis dispensary, and a vacant restaurant are located to the west. Single-family dwellings and a multi-family residential complex border the site from the south and single-family dwellings are located to the east of the project site.

Surrounding buildings are mostly one story except for two 2-story buildings located west of SR 12. An auto service and gas station is located to the northwest of the project site, on SR 12. Maxwell River Park is located at approximately 900 feet northwest of the project site. Sonoma Creek runs west of SR 12 at approximately 500 feet from the project site.

The portion of the project site fronting SR 12 is developed with a single-family residence built in 1939 in the Ranch architectural style with elements of Spanish Colonial Revival design and a large valley oak tree. The single-family residence is vacant and in a state of disrepair with some of the windows boarded up to deter trespassing. An approximately 2-foot fence borders the site in front of the single-family residence along Sonoma Highway. A driveway from SR 12 is located between the single-family residence and the valley oak tree. The remaining portion of the project site is undeveloped. **Figure 3** presents photographs of the project site.



Source: City of Sonoma, 2024.

Figure 1. Regional Site Location

View looking east at the single-family home from Highway 12

View looking east at the undeveloped portion of the project site

Figure 3. Photographs of the project site

II.3 Proposed Project Characteristics

The Montaldo Apartments Project (the proposed project) includes the demolition of the existing single-family residence and development of the 2.15-acre project site with 50 apartment units in seven 2- and 3-story residential buildings. The proposed Buildings 1 and 7 would be two-story buildings and would be located on the western and eastern boundaries of the project site. The proposed Buildings 2 through 6 would be three-story buildings and would be located within the center of the project site. All apartment homes would have a minimum of two bedrooms and two baths. Proposed building design of the two- and three-story buildings is shown in **Figure 4** and the proposed location of the buildings is shown in **Figure 5**.

Two types of building configurations are proposed:

- Buildings 1 and 7 (shown in **Figure 4**) would be two-story, approximately 30 foot tall buildings with five units and four single-car garage spaces for each building.

- Buildings 2 through 6 would be three-story, approximately 36-foot-tall buildings with eight units and would be of "stacked flat" type. Each unit would have access to a single or two-car garage.

The proposed project would include 13 affordable housing units (26 percent of the total residential units), with two of the units allocated for extremely-low-income households,[2] three of the units allocated for very-low-income households,[3] and the remaining eight units allocated for low-income households.[4]

Building 1 would be located at the front of the site and would be setback approximately 50 feet from SR 12. Buildings 2 and 3 would be located on the north side of the proposed drive aisle. Buildings 4, 5, 6, and 7 would be located on the south side of the drive and accessed via additional drive aisles perpendicular to the main drive. Building 4 would be setback approximately 25 feet from the western property line to reduce construction effects on the large oak trees located on the adjacent residential property.

The proposed project would maintain the large valley oak tree located at the front of the site. A 22-foot-wide drive aisle would be located approximately 4 feet from the northern property line and would provide access to the site. The proposed site layout is shown in **Figure 5**.

The property would be separated from adjoining properties by a six-foot tall wood fence. A low (3 feet), front accent fence is proposed to separate the public sidewalk along Sonoma Highway from the project site.

To maintain a design context similar to the existing single-family home, the proposed development would reflect a contemporary version of Spanish architecture. Building 1, facing SR 12, would be a two-story building with archways framing the front doors.

[2] Extremely low-income (ELI) households are defined as those earning up to 30% of the area median household income.
[3] Very-low income (VLI) households are defined as those earning between 30% and 50% of the area median household income.
[4] Low-income (LI) households are defined as those earning between 50% and 80% of the area median household income.

Access and building orientation are designed to accommodate access of emergency vehicles to the three-story living areas and exit via a hammer-head type turnaround. **Figure 6** illustrates the maneuverability and turning radius of a ladder truck within the project site.

Green Building Features. The proposed project would be required to comply with the State of California Cal Green Building Code (CalGreen) and energy efficiency standards in effect at the time of permit approval.

Open Space, Landscaped Areas, and trees. The proposed project would include approximately 24,164 square feet of common open space, approximately 976 square feet of private patios or decks, and a total landscaped area of 28,007 square feet[5] (see **Figure 7**). The proposed project would provide approximately 483 square feet of common open space per each proposed apartment unit. The size of some of the proposed private patios would not meet the dimensions required by City of Sonoma Municipal Code. Therefore, the project applicant is requesting a concession for not meeting this requirement.

A private open space in the form of deck, porch, or patio would be provided for each unit in Buildings 1 and 7. All units in Building 2 through 6 would have a private open space (deck, porch, patio).

Of the 89 trees present at the project site[6], the project would remove 77 trees. Trees to be preserved include the large valley oak tree located at the front of the site.

Parking. The proposed project would provide a total of 89 parking spaces with 68 garage stalls, 3 carports, and 18 open parking spaces. Apartment units would have a one-car garage or a 2-car garage.

Buildings 1 and 7: Two of these five units would have direct access to a single-car garage. Two other units would share a common entry foyer and stairway to their respective units and would have their own independent garage spaces. One unit within each of Buildings 1 and 7 would not have a garage. However, these units would have their reserved surface parking near the building.

Buildings 2 through 6: Each unit would have access to a single or two-car garage. Two units would share a common entry/garage foyer and stairway to their respective units.

Pedestrian and Bicycle Facilities. The proposed project would provide a pedestrian sidewalk fronting the project frontage. The proposed project would also include pedestrian walkways that would connect the buildings to parking areas, common open spaces, and to the public sidewalk along SR 12.

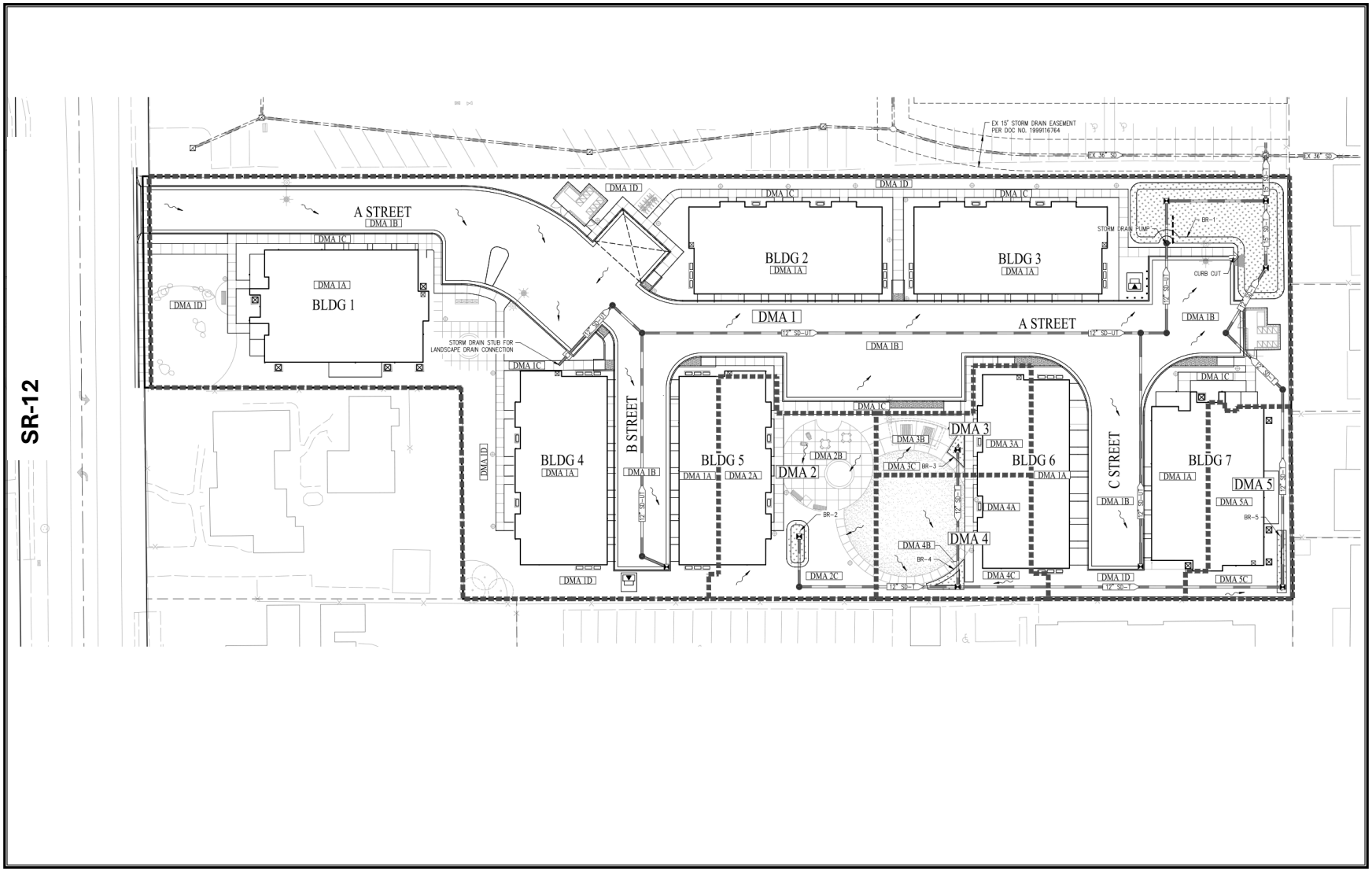
[5] City of Sonoma Municipal Code 19.40.070 requirements for common open space are 300 square feet per dwelling unit. The Code requirements for private decks are 150 square feet per dwelling unit of minimum 7 feet in length or 100 square feet rectangle.
[6] Horticultural Associates. 2023. Tree Inventory Report. 19320 Sonoma Highway, Sonoma, CA. December 5.

Proposed design for Buildings 1 and 7

Proposed design for Buildings 2 through 6

Source: WHA, 2024

Figure 4. Proposed Buildings Design



Source: *cbg Civil Engineers, April 2025*

Figure 5. Proposed Site Layout

City of Sonoma Municipal Code 19.48.110 requires bicycle parking spaces to be conveniently located and generally within proximity of the main entrance to the structure. All parking stalls would have space for bicycle storage. Additional bicycle parking spaces would be provided near the center of the project site north of the proposed drive isle.

Utilities. Utilities have been designed to connect to existing public utility lines located within SR 12 (water and sewer) and in existing public utility easements to the east and north (storm drain). Existing utilities lines with SR 12 include an 8-inch water main and a 6-inch sanitary sewer. A 36-inch stormwater drainpipe is located within a public easement along the northeast side of the site that connects to a 15-inch pipeline along the north site boundaries.

Water would be provided to the site through the 8-inch main located within SR 12. The sanitary sewer is proposed to connect to an existing 6-inch sewer line within SR 12 at the north corner of the project site.

The existing impervious surface covers approximately 0.06 acres (0.3%) of the gross site area consisting of the single-family roof and surrounding concrete pavement. The remaining project site portion of approximately 2.09 acres (90,556 square feet)– equivalent to 97.2 percent is pervious and consists of gravel, grass and trees. Stormwater runoff at the project site primarily sheet flows east to an overland release in the southeast corner along the neighboring parcel. Stormwater runoff of the paved portion of the site flows toward SR-12 at the level of the existing driveway. Existing stormwater flows are estimated at 0.88 cubic feet per second (cfs) during a 10-year storm and 1.30 cfs during a 100-year storm.[7] The proposed project would result in approximately 64,090 square feet of impervious surface and 29,347 square feet of pervious surface. Stormwater management would include five detention and infiltration basins that would connect to the existing 36-inch storm drain northeast of the project site. On-site runoff generated by roofs, asphalt, hardscape and landscaped areas will be routed to 5 individual bioretention facilities. (see **Figure 7**).

Two common trash enclosures would be provided within the project site with one located along the northern boundary near Building 2 and the second along the eastern boundary near Building 7 (see **Figure 7**).

Density Bonus. The proposed project would include 13 affordable housing units (26 percent of the total residential units), with two of the units allocated for extremely-low-income households,[8] three of the units allocated for very-low-income households,[9] and the remaining eight units allocated for low-income households.[10] The affordable units would be distributed throughout the buildings.

Pursuant to Government Code Section 65915, with the provision of 26 percent affordable units, the project would be eligible for a 32.5 percent density bonus with two incentives or

[7] Cbg. 2024. Memorandum: Post Developed Peak Storm Drain Analysis. 19320 Sonoma Highway. Sonoma, CA 95476. November 18.
[8] Extremely low-income (ELI) households are defined as those earning up to 30% of the area median household income.
[9] Very-low income (VLI) households are defined as those earning between 30% and 50% of the area median household income.
[10] Low-income (LI) households are defined as those earning between 50% and 80% of the area median household income.

concessions[11] and unlimited waivers[12] of development standards. The applicant does not intend to request additional density but does intend to request two concessions and one waiver:

Concession 1: Floor Area Ration (FAR). The proposed project FAR would be 0.72. This would exceed the maximum allowable FAR of 0.70. The proposed project design provides the minimum allowable dimensions for the garage spaces, which would be located under the proposed units. Therefore, it would not be possible to reduce the FAR without reducing the building sizes and decreasing the total number of residential units, which would affect the number of affordable housing units.

Concession 2: Provision of Private Open Space. The proposed project would provide approximately 503 square foot of common and private open space per residential unit. While the project would comply with the 300 square feet of common open space (SMC Section 19.40.070) or combination of private and common open space (SMC Chapter 19.34), it would not comply with SMC Section 19.40.070 requirement of 150 square feet per unit with a minimum dimension of 7 feet or an inscribed rectangle of 100 square feet. To provide additional private open space, the patios, porches, or decks would protrude into either required setbacks, required vehicular accessways, or interfere with required emergency access.,

Waiver: Setbacks for Trash Enclosures. One of the two locations for trash enclosures would be less than the minimum 5-foot setback. The trash enclosure near Building 2 would be approximately setback 2.5 feet from the northern site boundary. The trash enclosure near Building 7 would be 5 feet from the eastern site boundary.

I.6 Project Construction.

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

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

The construction workforce would typically consist of a maximum of 18 workers per day, with the number of workers onsite ranging from 5 to 18 on any given day. Construction activities for the proposed project are expected to span approximately 26 months. During this period, earthwork and other construction activities would require the use of various equipment including backhoes, excavators, loaders, forklifts, compressors, cement and mortar mixers, and jackhammers. The construction workforce is anticipated to generate an average of 36 trips per day throughout most of the construction period. Other preparation and finishing activities may result in between 12 and 30 trips per day. Over the construction period, the proposed project would generate

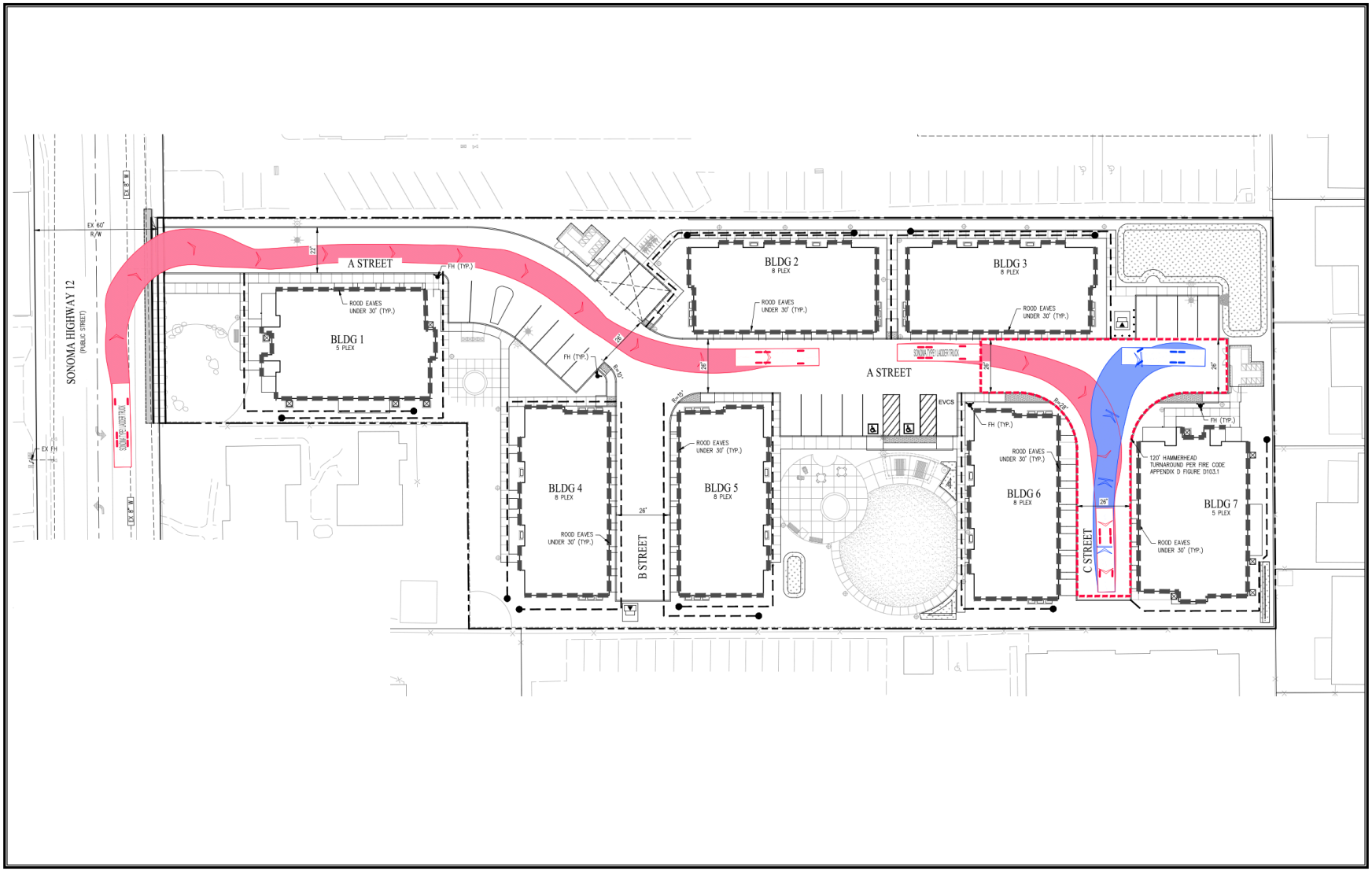
[11] A privilege or exception granted under a regulatory framework.
[12] Developers can request waivers of specific development standards (such as height limits, setbacks, or parking requirements) if they can demonstrate that these requirements will physically prevent or unduly constrain the development of affordable housing.

approximately 2,750 truck trips, with the majority of these trips (approximately 1,800 trips) resulting from the delivery of construction materials.

II.4 Required Project Approvals

The following is a preliminary list of potential approvals needed for the project construction Needed permits and approvals will be confirmed during the preparation of the CEQA document. This list is not intended to be inclusive of all permits required:

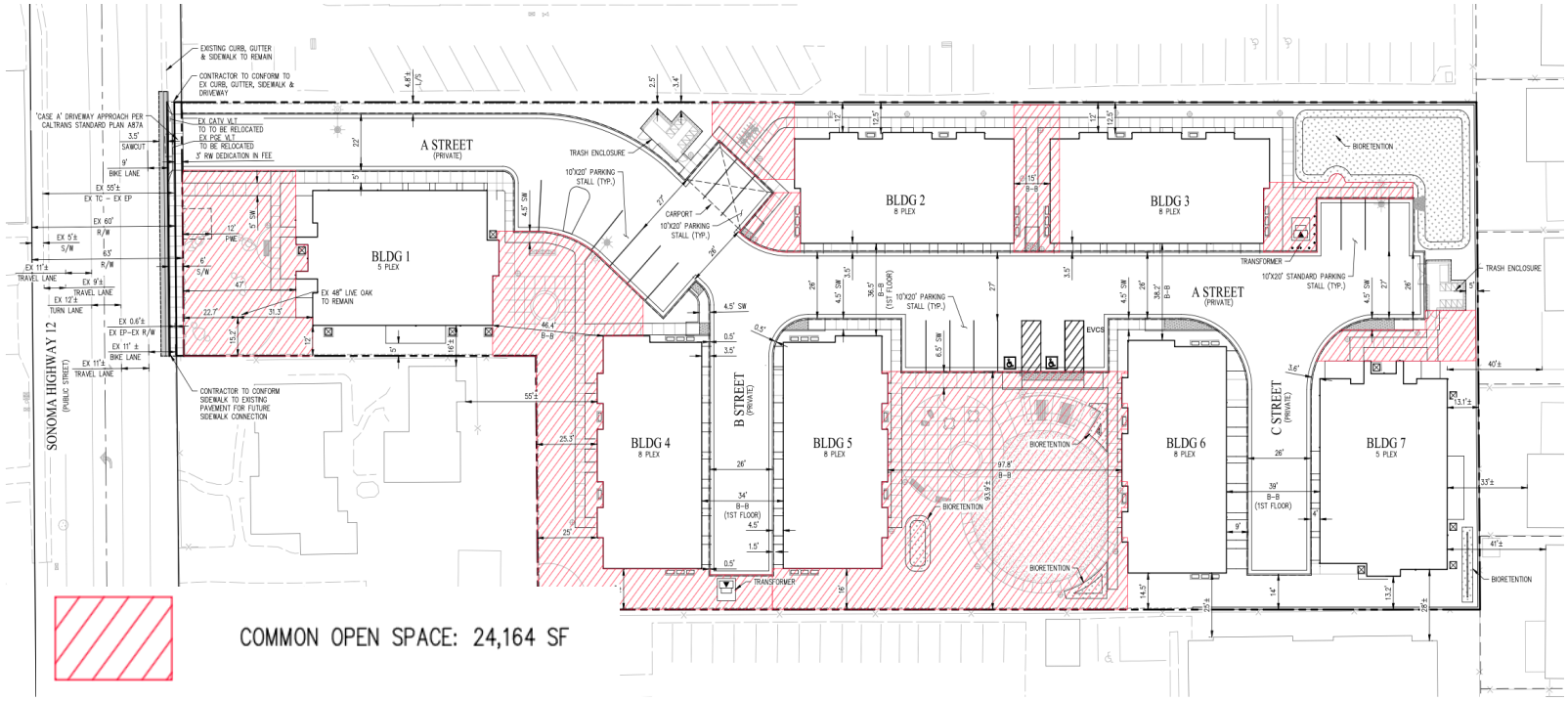
- City of Sonoma certification of the EIR
- Encroachment Permits for any work within the public right-of-way (e.g. curb cuts, sidewalk improvements, utility work, etc.)
- Major Design Review for construction of a multifamily dwelling pursuant to SMC Section 19.54.080, Table 5-2
- Demolition permit for removal of a historical resource pursuant to SMC Section 19.54.090
- Lot Merger to dissolve property boundary between the two parcels at the project site pursuant to SMC Section 16.07.060
- Tree removal permit pursuant to SMC Section 12.08.035
- Density Bonus for utilization of density bonus waivers and/or concessions for (including but not limited to) floor area ratio (FAR) and private open space pursuant to SMC Chapter 19.44
- Sign permit for placement of a monument sign to display the complex name and street address pursuant to SMC Title 18
- Grading and Building Permits for construction of the project buildings
- Caltrans Encroachment Permit
- Sonoma County Water Agency approval of proposed water supply improvements
- Sonoma Valley County Sanitation District approval of proposed wastewater improvements
- PG&E approval of electrical facilities
- Other local, state, or federal approvals or permits may be necessary pursuant to applicable laws and regulations.



Source: *cbg, Civil Engineering, April 2025*

Figure 6. Emergency Access

Figure 7- Common Open Space



Source: *cbg, Civil Engineering, April 2025*

Figure 7. Common Open Space

II.5 Project Objectives

The project objectives are as follows:

- Redevelop an underutilized site in an urban infill location with dwelling units and open space amenities.
- Contribute to the General Plan's Housing Element goals and the Association of Bay Area Government's (ABAG's) Regional Housing Needs Allocation for the City of Sonoma.
- Contribute to the City's goals for providing affordable housing units in the City of Sonoma.
- Produce a high-quality architectural and landscape design that encourages variety, is compatible with its surrounding context, and promotes sustainability through environmentally sensitive design features that meet the requirements of the California Green Building Standards Code (CALGreen) and the California Energy Code.
- Develop the project site to encompass ample open space amenities for building residents and encourage use of common residential open space.
- Address the comments provided by the City's Planning Commission by preserving the large valley oak tree along the project frontage and developing the site with a modern Spanish architecture in tribute to the existing home.
- Provide off-street vehicle parking that is adequate for the occupancy proposed pursuant to Section 19.48.040 of the Sonoma Municipal Code.
- Construct a sufficient number of dwelling units to make redevelopment of the site economically feasible by producing a reasonable return on investment for the project, attracting investment capital and construction financing, and generating sufficient revenue to provide onsite affordable housing units

III. ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

III.1 Introduction to the Environmental Analysis

This chapter provides an impact analysis of the potentially significant, physical environmental impacts of project implementation as described in **Chapter II, Project Description**. **Section III.2** of this chapter presents the scope of the impact analysis for the key resource topics identified in the Initial Study, as described below. This impact overview section describes the scope of analysis in the Initial Study and EIR and explains the format and basis for the impact analysis for all resource topics, including the cumulative impact analysis for these topics.

III.2 Scope of Analysis

Initial Study

As described in **Chapter I, Introduction**, the City of Sonoma determined that an EIR is required for the proposed project in compliance with the CEQA and published an NOP (**Appendix B**). As part of the preparation for the EIR, the City of Sonoma identified resource topics that could be adequately addressed in an Initial Study.

The Initial Study prepared for this EIR (**Appendix A**) concludes that many of the physical environmental impacts of the proposed project would result in no impact or less than significant impacts, and that mitigation measures agreed to by the project applicant and required as conditions of approval of the proposed project would reduce most significant impacts to a less than significant level. CEQA does not require further assessment of a project's less than significant impacts or those that can be reduced to less than significant with mitigation. Therefore, those topics are not included in this chapter. The following environmental resources are addressed in the Initial Study:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources (Archaeological Resources and Human Remains)
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning

- Mineral Resources
- Noise Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

EIR Analysis

The resource topic area addressed in this chapter of the Draft EIR is the Cultural Resources topic.

CEQA Guidelines Section 15151 describes standards for the preparation of an adequate EIR. Specifically, the standards under Section 15151 state:

- An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently takes into account environmental consequences.
- An evaluation of the environmental impacts of a project need not be exhaustive; rather, the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible.
- Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts.

Based on the CEQA Guidelines stated above, the EIR analysis should use a reasonable, professionally accepted methodology to assess impacts. This approach sometimes requires making reasonable assumptions using the best information available. In some cases, when information is limited, this Draft EIR employs a "reasonable worst-case analysis" to identify the largest expected potential change from existing baseline conditions that the proposed project may create. This approach thus identifies the most severe impact that could occur, providing a conservative analysis of potential environmental impacts.

Format and Content of this Chapter

The analysis of this resource topic is organized in the following format:

1. **Environmental Setting**: Provides an overview of the baseline physical environmental conditions, in accordance with the CEQA Guidelines (14 CCR Section 15125[a][1]).

2. **Regulatory Framework**: Identifies the plans, policies, laws, regulations, and ordinances that are relevant to each topical section based on current conditions.

3. **Environmental Impacts and Mitigation Measures:** Identifies the adverse physical environmental impacts of the proposed project in accordance with the CEQA Guidelines (14 CCR Sections 15125 and 15143). This subsection is organized as follows:

   - **Significance Criteria**: The discussion under this heading lists the criteria—specific to the resource topic—used to identify and determine significant environmental effects of the proposed project. Under CEQA, a significant effect is defined as a substantial or potentially substantial adverse change in the environment. The significance criteria are derived from Appendix G of the CEQA Guidelines.

   - **Impact Analysis:** Describes potential adverse physical environmental effects associated with implementation of the proposed project. The Impact Analysis specifies why impacts are found to be significant and unavoidable, significant or potentially significant, or less than significant, or why there is no environmental impact, based on the identified thresholds of significance. The impacts are listed numerically and sequentially throughout each section.

   - **Mitigation Measures**: Avoid, minimize, rectify, reduce, or compensate for significant and potentially significant impacts of the proposed project, in accordance with the CEQA Guidelines (14 CCR Sections 15370, 15002[a][3], 15021[a][2], and 15091[a][1]), where feasible, are recommended for each significant and potentially significant impact. If implementation of feasible mitigation measures is not sufficient to reduce an impact to a "less-than-significant" level, or no feasible mitigation measures are available, the impacts are described as "significant and unavoidable."

4. **Cumulative Impacts.** The discussion under this heading considers the combined impacts of the proposed project and other closely related projects. A further description of cumulative impacts and other related projects is provided below in **Section III.3, Cumulative Impact Analysis**.

Significance Determination

This Draft EIR uses the following terminology to denote the significance of each identified environmental impact.

- **No impact** indicates that the construction, operation, and maintenance of the proposed project would not have any direct or indirect effects on the environment. It means no change from existing conditions. This impact level does not need mitigation.

- A **less-than-significant impact** is one that would not result in a substantial or potentially substantial adverse change in the physical environment. This impact level does not require mitigation, even if feasible, under CEQA.

- A **significant impact** is defined by Public Resources Code Section 21068 as one that would cause "a substantial, or potentially substantial, adverse change in the environment." CEQA Guidelines Section 15382 further clarifies that the environment includes "any of the physical conditions within the area affected by the project." Levels of significance can vary by project, based on the change in the existing physical condition.

Under CEQA, mitigation measures or alternatives to the proposed project must be provided, where feasible, to reduce the magnitude of significant impacts.

- A **potentially significant impact** is one that, if it were to occur, would be considered a significant impact as described above before the application of mitigation. For CEQA purposes, a potentially significant impact is treated as if it were a significant impact.

- A **significant and unavoidable impact** is one that would result in a substantial or potentially substantial adverse effect on the environment, and that could not be reduced to a less-than-significant level even with any feasible mitigation. Under CEQA, a project with significant and unavoidable impacts may proceed, but the lead agency is required to prepare a "statement of overriding considerations" in accordance with CEQA Guidelines Section 15093, explaining why specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects.

- A **beneficial impact** is an impact that is considered to cause a positive change or improvement in the environment and for which no mitigation measures are required.

An impact may have a level of significance that is too uncertain to be reasonably determined, which would be designated too speculative for meaningful evaluation, in accordance with CEQA Guidelines Section 15145. Where some degree of evidence points to the reasonable potential for a significant effect, the EIR may explain that a determination of significance is uncertain, but is still assumed to be "potentially significant," as described above. In other circumstances, after thorough investigation, the determination of significance may still be too speculative to be meaningful. This is an effect for which the degree of significance cannot be determined for specific reasons, such as because aspects of the impact itself are either unpredictable or the severity of consequences cannot be known at this time.

CEQA Guidelines Section 15125 states that the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." The environmental setting typically includes the existing physical conditions on the project site and vicinity at the time of NOP publication, including projects that are under construction. The environmental analysis then presents existing and existing-plus-project scenarios to identify environmental impacts that would occur from implementation of the proposed project.

III.3 Cumulative Impact Analysis

CEQA Requirements for Cumulative Impact

Cumulative impacts, as defined in CEQA Guidelines Section 15355, refer to two or more individual effects that, when taken together, are "considerable" or that increase other environmental impacts. A cumulative impact from several projects is the change in the environment that would result from the incremental impact of the project added to the impacts of other reasonably foreseeable future projects. Pertinent guidance for cumulative impact analysis is provided in CEQA Guidelines Section 15130:

- An EIR shall discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable."

- An EIR should not discuss impacts that do not result in part from the project evaluated in the EIR.

- A project's contribution is less than cumulatively considerable, and thus not significant, if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.

- The discussion of impact severity and likelihood of occurrence need not be as detailed as for effects attributable to the project alone.

- The focus of analysis should be on the cumulative impact to which the identified other projects contribute, rather than on attributes of the other projects that do not contribute to the cumulative impact.

The cumulative impact analysis for each individual resource topic is described in each resource section immediately following the description of the direct project impacts and identified mitigation measures. For resource topics where the proposed project would result in no impact, it would not contribute to cumulative impacts. Therefore, a cumulative impacts analysis is not included for these resource topics.

Approach to Cumulative Impact Analysis

Two approaches to a cumulative impact analysis are provided in CEQA Guidelines Section 15130(b)(1):

- The analysis can be based on a list of past, present, and reasonably foreseeable future projects producing closely related impacts that could combine with those of a proposed project; or

- A summary of projections contained in a general plan or related planning document can be used to determine cumulative impacts.

The analyses in this Draft EIR and attached Initial Study employ a list-based approach. The following factors were used to identify reasonably foreseeable future projects where the list-based approach is used:

- **Similar Environmental Impacts:** A relevant project contributes to effects on resources that are also affected by the proposed project. A relevant future project is defined as one that is "reasonably foreseeable," such as a proposed project for which an application has been filed with the approving agency or for which funding has been approved.

- **Geographic Scope and Location:** A relevant project is one located in the geographic area within which effects could combine. The geographic scope varies on a resource-by-resource basis. For example, because health risk impacts from exposure to air pollutants are generally localized, the cumulative context for health risk analysis is the project site and vicinity within 1,000 feet of the project site or the maximally exposed receptor. In contrast, the geographic scope for evaluating cumulative effects on regional air quality consists of the affected air basin (i.e., the San Francisco Bay Area Air Basin) and the summary of projections approach is used.

- Timing and Duration of Implementation: Effects associated with activities for a relevant project (e.g., short-term construction or demolition or long-term operations) would most likely coincide with the related effects of the proposed project.

Cumulative impacts are not analyzed for resource topics where the project would have no impact, as it would not contribute to any significant cumulative effects.

Cumulative Environmental Setting

The projects considered in this EIR for the cumulative impact analysis are the Verano Hotel and Housing project and the Hotel Project Sonoma.

- **Verano Hotel and Housing Project.** This project, located at approximately 0.5 miles northwest of the project site, includes 120-room mid-priced hotel facing Verano Avenue and 71-unit apartment complex behind the hotel. The hotel building includes a rooftop observation deck and garden on the southern portion of the 5.9-acre site. The height of the hotel is 52 feet and 10 inches. The apartment complex of maximum height of 43 feet will be located on the northern portion of the site and consist of 100 percent affordable rental apartment complex of 71 units in six buildings. This project will also include a landscaped parklet of approximately 15,000 square feet located on the southwest corner of the site and will contain passive recreational amenities such as benches, water fountains, and historical and educational markers.

  The construction of the housing will begin in advance of the hotel. The combined construction timeframe will exceed a year. The majority of the site will be graded for parking and structures, but the area adjacent to the Agua Caliente Creek, located along the northern boundary, will be avoided.

  The Verano and Housing Project is currently under construction is estimated to be completed within approximately two years.

- **Hotel Project Sonoma**. The Hotel Project Sonoma, located at approximately 1.2 miles southeast of the project site, would redevelop approximately 1.24 acres of land in the City of Sonoma's Downtown District, adjacent to and south of SR 12 and adjacent to and west of First Street West. This Project includes the construction of a 62-guestroom hotel, 80-seat restaurant and bar, a spa with 6 treatment rooms, raised swimming pool veranda, 130 on-site parking spaces (consisting of a 113-stall basement parking garage, 9 surface parking spaces, and 8 covered residential parking spaces), and an 8-unit residential condominium building. As part of this project, three existing commercial buildings, and existing parking lots and landscaping, would be demolished. This project also includes reconfiguring the on-site infrastructure as necessary to support the proposed redevelopment, including water supply, wastewater conveyance, stormwater detention, electricity, natural gas, and interior drive aisles.

  The Hotel Project Sonoma has received entitlements but has not submitted for building permits.

III.4 Cultural Resources

Introduction

This section assesses the proposed project's potential impact on cultural resources, specifically, a historical resource. It outlines the regulatory framework, describes the existing environmental setting as it relates to historical resources, identifies potential historical resources near the project site, evaluates potential direct and indirect impacts on historical resources that could result from project implementation, and identifies mitigation measures to reduce potential adverse impacts. Project-related impacts on archaeological resources, human remains, and tribal cultural resources are addressed in **Appendix A**, Initial Study, of this draft environmental impact report (EIR).

As outlined in **Chapter I, Introduction**, consistent with the requirements of CEQA Guidelines Sections 15063 and 15082, the City of Sonoma circulated an NOP that an EIR would be prepared. One of the comments received on the NOPs related to historical resources included concerns about the demolition of the historical home at the project site. Concerns were raised on how the demolition of the single-family residence would impact the existing architectural character and aesthetic appeal along SR 12. These comments are addressed in the discussion below, under Impact CR-1.

Data Sources

A historical resource is defined in CEQA Guidelines Section 15064.5(a) as one that is listed in, or determined to be eligible for listing in, the California Register of Historical Resources (California Register). In addition, a resource that (i) is identified as significant in a local register of historical resources, or (ii) is deemed significant due to its identification in a historical resources survey meeting the requirements of California Public Resources Code Section 5024.1(g) is presumed to be a historical resource "unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant." CEQA Section 21084.1 also permits a lead agency to determine that a resource constitutes a historical resource even if the resource does not meet the foregoing criteria. For the purposes of this analysis, the term historical resources is used to distinguish such resources from archaeological resources, which may also be considered historical resources under CEQA. Archaeological resources, including archaeological resources that are potentially historical resources under CEQA Guidelines Section 15064.5, are addressed in the Initial Study (see **Appendix A**).

The historical resource analysis included in this section is generally based on the Historical Resource Evaluation prepared for the single-family residence at the project and reviewed by the City's historic resource consultant. The data sources used in the analysis include the following:

- De Shazo, Stacy. *A Historic Resource Evaluation of the Property Located at 19320 Highway 12, Sonoma, Sonoma County, California*. July 31, 2021. Revised July 27 and August 11, 2023.
- Painter, Diana. *Peer Review of Historic Resource Evaluation, 19320 Sonoma Highway, Sonoma*. July 3, 2023.
- Painter, Diana. *Peer Review of Historic Resource Evaluation, 19320 Sonoma Highway, Sonoma*. August 21, 2023.
- Hess, Alan. *The Ranch House.* New York: Harry N. Abrams, Inc., 2004.

- McAlester, Virginia Savage. A Field Guide to American Houses: The Definitive Guide to Identifying andUnderstanding America's Domestic Architecture. New York: Alfred A. Knopf, 2013.

- City of Sonoma. *2020 General Plan*. October 2006.

- USDA Historic Aerial Photographs. 1948, 1959, 1968.

Regulatory Framework

The following section summarizes the plans and policies of federal, state, and local agencies that have regulatory oversight over historical resources within the project area.

Federal Regulations

Although the proposed project is not anticipated to require compliance with Section 106 of the National Historic Preservation Act, the federal guidelines related to the treatment of cultural resources are relevant for the purposes of determining whether cultural resources, as defined under CEQA, are present and guiding the treatment of such resources. The sections below summarize the relevant federal regulations and guidelines.

National Register of Historic Places

The National Register is the nation's official comprehensive inventory of historical resources. Administered by the National Park Service, the National Register includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. Typically, a resource that is more than 50 years of age is eligible for listing in the National Register if it meets any one of the four eligibility criteria and retains sufficient historical integrity. A resource less than 50 years old may be eligible if it can be demonstrated that it is of "exceptional importance" or a contributor to a historic district.

A structure, site, building, district, or object would be eligible for listing in the National Register if it can be demonstrated that it meets at least one of the following four evaluative criteria:

- **Criterion A (Event):** Properties associated with events that have made a significant contribution to the broad patterns of our history;

- **Criterion B (Person):** Properties associated with the lives of persons significant in our past;

- **Criterion C (Design/Construction):** Properties that embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant distinguishable entity whose components lack individual distinction; and

- **Criterion D (Information Potential):** Properties that have yielded, or may be likely to yield, information important in prehistory or history.

Although there are exceptions, certain kinds of resources are not usually considered for listing in the National Register: religious properties, moved properties, birthplaces and graves,

cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years.

In addition to meeting at least one of the four criteria, a property or district must retain integrity, meaning that it must have the ability to convey its significance through the retention of seven aspects, or qualities, that in various combinations define integrity:

- **Location:** Place where the historic property was constructed;
- **Design:** Combination of elements that create the form, plans, space, structure, and style of the property;
- **Setting:** The physical environment of the historic property, inclusive of the landscape and spatial relationships of the buildings;
- **Materials:** The physical elements that were combined or deposited during a particular period of time and in a particular pattern of configuration to form the historic property;
- **Workmanship:** Physical evidence of the crafts of a particular culture or people during any given period in history;
- **Feeling:** The property's expression of the aesthetic or historic sense of a particular period of time; and
- **Association:** Direct link between an important historic event or person and an historic property.

Properties that are listed in the National Register, as well as properties that are formally determined to be eligible for listing in the National Register, are automatically listed in the California Register and, therefore, considered historical resources under the California Environmental Quality Act (CEQA).[13]

National Historic Landmarks

The National Historic Landmarks (NHL) program recognizes properties possessing national significance. All NHLs are also included in the NRHP. The program was authorized by the Historic Sites Act of 1935 and placed under the administration of the NPS after passage of the NHPA in 1966. A historic property must possess exceptional heritage value and be significantly associated with the history of the nation to be recognized as an NHL.

The Secretary of the Interior's Standards for the Treatment of Historic Properties

The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Secretary's Standards) were published and codified as 36 Code of Federal Regulations part 68 in 1995 and

[13] California Code of Regulations, Title 14, Chapter 11.5, Section 4851, Historical Resources Eligible for Listing in the California Register of Historical Resources. https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-3-department-of-parks-and-recreation/chapter-115-california-register-of-historical-resources/section-4851-historical-resources-eligible-for-listing-in-the-california-register-of-historical-resources. Accessed on December 12, 2024.

updated in 2017.[14] The Secretary's Standards provide a useful analytical tool for understanding and describing the potential impacts of changes to historical resources and are used to inform CEQA review. Developed by the National Park Service for reviewing certified rehabilitation tax credit projects, the rehabilitation standards provide guidance for reviewing work on historic properties. The rehabilitation standards are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

8. Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

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

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

Conformance with all rehabilitation standards does not determine whether a project would cause a substantial adverse change in the significance of a historical resource under CEQA. Rather,

[14] U.S. Department of the Interior, National Park Service. The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstruction Historic Buildings, revised 2017. https://www.nps.gov/orgs/1739/secretary-standards-treatment-historic-properties.htm. Accessed on December 12, 2024.

projects that comply with the standards benefit from a regulatory presumption that they would have a less than significant adverse impact on a historical resource. Projects that do not comply with the rehabilitation standards may or may not cause a substantial adverse change in the significance of a historical resource and would require further analysis to determine whether the historical resource would be "materially impaired" by the project under CEQA Guidelines Section 15064.5(b).

State Regulations

California Register of Historical Resources

The California Register of Historical Resources (CRHR), administered by the California Office of Historic Preservation, is the authoritative guide to historical and archaeological resources that are significant within the context of California's history. Criteria for eligibility for inclusion in the California Register are based on and correspond to the National Register criteria. Certain resources are determined under CEQA to be automatically included in the California Register, including California properties formally eligible for or listed in the National Register. The evaluative criteria used for determining eligibility for listing in the California Register closely parallel those developed by the National Park Service for the National Register but include relevance to California history. To be eligible for listing in the California Register as a historical resource, a resource must meet at least one of the following criteria (Public Resources Code Section 5024.1(c)):

- **Criterion 1 (Event):** Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;

- **Criterion 2 (Person):** Resources that are associated with the lives of persons important to local, California, or national history;

- **Criterion 3 (Design/Construction):** Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master or possesses high artistic values; or

- **Criterion 4 (Information Potential):** Resources that have yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

In addition to meeting one or more of the above criteria, the CRHR requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." (14 CCR 4852 [d][2]). Fifty years is normally considered sufficient time for a potential historical resource, and in order that the evaluation remain valid for a minimum of five years after the date of a report, all resources older than 45 years will typically be evaluated.

Integrity

In addition to being age-eligible (i.e. 45 years old or older) and significant under one or more of the above criteria, the CRHR also requires that a resource that is eligible to the CRHR possess integrity. Integrity is defined as the ability for a resource to convey its historic identity through seven aspects: (1) location; (2) setting; (3) design; (4) materials; (5) workmanship; (6) feeling; and (7) association.

California Environmental Quality Act

Lead agencies (local governments with permit approval) are required by CEQA to carry out environmental impact analysis. Historical resources are considered part of the environment and are subject to review under CEQA. Historical resources are defined by CEQA Guidelines (California Code of Regulations [CCR] Title 14, Chapter 3, 15064.5) as follows:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resource Code [PRC] 5024.1, Title 14 CCR, Section 4850 et seq.).

2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the CRHR.

The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

Local Regulations, Plans, and Policies

City of Sonoma General Plan

The City of Sonoma 2020 General Plan provides goals and policies that emphasize the careful preservation of Sonoma’s historic character and the protection of historic buildings and sites for the use and enjoyment of future generations.

Community Development Element

Community Development Element policies that encourage historic preservation include:

- Policy 5.1: Preserve and enhance the scale and heritage of the community without imposing rigid stylistic restrictions

- Policy 5.4: Preserve and continue to utilize historic buildings as much as feasible.

- Policy 5.8: Encourage the designation and preservation of local historic structures and landmarks and protect cultural resources.

Local Economy Element

Local Economy Element policies that encourage historic preservation include:

- Policy 1.5: Promote and accommodate year-round tourism that is consistent with the historic, small-town character of Sonoma.
- Policy 1.8: Preserve and enhance the historic Plaza area as a unique, retail-oriented commercial and cultural center that attracts both residents and visitors.

City of Sonoma Municipal Code

Chapter 19.42 Historic Preservation and Infill in the Historic Zone

The City's commitment to historic preservation is codified in Chapter 19.42 of the *Sonoma Municipal Code, which "is intended to safeguard the historic character of Sonoma by recognizing and preserving significant historic and cultural resources," to provide "incentives for the preservation and rehabilitation of historically and culturally significant resources," and ensure that "new development in the historic overlay zone is architecturally compatible."*

Chapter 19.42 establishes incentives, standards, and guidelines for the preservation and adaptive reuse of "designated historic structures" as well as a process for historical resource designation, which may be initiated by a property owner or by the Design Review and Historic Preservation Commission and historical resource nomination requires a public hearing; the Design Review and Historic Preservation Commission may approve or disapprove a nomination. Resources previously designated historically significant are also considered historical resources.

Designated historical resources must meet at least one of the following criteria (which are based on NRHP and CRHR criteria):

a. It is associated with events that have made a significant contribution to Sonoma's history and cultural heritage; or

b. It is associated with the lives of persons important in Sonoma's past; or

c. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

d. It has yielded, or may be likely to yield, information important in Sonoma's prehistory or history.

Chapter 19.42 also establishes local historic district designation and establishes a process for designating local historic districts as well as guidelines for adaptive reuse and infill within the historic overlay zone. The historical house is not a contributor to a historic district, nor is it sited within or adjacent to a historic district. The historic overlay zone is 0.5 mile east of the project site.

Therefore, historic district and historic overlay zone policies are not relevant to the proposed project.

Environmental Setting

The project site is located approximately one mile west of Sonoma Plaza on the east side of Highway 12 and 500 feet east of Sonoma Creek, which forms the contemporary western limits of the City of Sonoma; the unincorporated community of El Verano begins on the western side of Sonoma Creek. The single-family residence located at the project site is one of a few surviving of pre-1950 residences in the neighborhood, which is dominated by the large-scale commercial districts to the north and west of the project site. With a wide variety of uses, intermittent sidewalks, buildings constructed over a 120-year period, and no consistent pattern of lot size or setback, the neighborhood lacks a cohesive identity.

The single-family residence, built in 1939, is set back approximately 25 feet from SR 12. There is no sidewalk in front of the home, which is separated from the road by a low concrete masonry unit wall topped with brick; breaks in the wall provide access to a concrete path leading to the front door and a driveway at the south end of the project site. Landscaping is untended, with dead grass in front of the house and untrimmed trees. There is a large valley oak tree near the southwest corner of the project site. A tall board fence encloses the area behind the house and along the northern site boundary.

The single-family residence is a Spanish Revival-style house with complex massing and an asymmetrical façade accented by a projecting gabled wing. It is roughly T-shaped in plan, with a pitched mission-style clay tile roof on the front (west) half of the house and a flat roof with parapet on the rear (east) half. The roof on the front section is medium pitched with clay tile coping along the minimal eaves. Its form is complex (a typical feature of Spanish-inspired architecture), with a hipped-roof tower at the intersection of front-and side-gabled volumes and a shed roof over the porch. A section with taller walls that rise above the porch roof near its south end is punctuated by a stucco chimney and has its own shed roof that slopes southward. A small side-gabled volume with tile roof projects from the south end of the back section of the building. The house is finished with a combination of hand-troweled stucco and has circular clay tile vents in upper walls. The building appears to rest on a concrete slab foundation. Fenestration consists of multiple-light double-leaf casement windows on the front of the house with double-hung six-over-one wood sash at the rear.

The west (primary) façade consists of a projecting front-gabled north wing and a side-gabled main volume with clay tile coping and clay tile vents along the roof eaves. There is an arcade-style porch with a shed roof and an open patio/courtyard along the west elevation. The arcade-style porch has three arches along its west elevation and a side arch along its south elevation. There is a 10-light fully glazed wooden door on the main entrance and three wood casement windows within the porch. The front porch is accessed at the west and south via sets of concrete steps and has a scored concrete floor. The porch ceiling is wood with wood beams. A low-height tower is set at the junction between the shed-roof front porch and the projecting gable. Along the lower portion of the tower is an ornamental grate with “punched” openings. The projecting front-gabled north wing has a fixed arched picture window recessed within a beveled arched opening and trimmed with wide wood casing.

The south elevation has an arched opening that provides secondary access to the front porch via a walkway from the driveway south of the house. From the south, the primary roof exhibits a west-sloping shed on the porch and a south-sloping shed behind it, with a taller parapet to the east. The patio/courtyard just east of the porch is enclosed in a low concrete masonry unit wall; behind the patio is a small, projecting side-gabled volume. It has a double-leaf fully-glazed multiple-light entrance door on its west façade; on the south there are two wood casement windows, and a small, narrow window.

The east elevation consists of the projecting side-gabled form with the flat-roof area to its north with parapet and no coping. The north end has a projecting bay. An entry porch has a set of concrete steps and a concrete landing with a projecting shed roof clad in roofing membrane material. It is supported by two square wood posts connected by a simple wood railing. The wood panel door is partially glazed. There are double-hung wood windows in various sizes and configurations on the east elevation. There is a painted metal downspout gutter to the north of the rear entry porch with a funnel top.

The north elevation, which is minimally visible, has two pairs of six-over-one double hung wood windows and two casement windows. There is some staining along the exterior stucco walls on all elevations.

Historical Resources in the Site Vicinity

A search of the California Office of Historic Preservation's Built Environment Resource Directory for Sonoma County revealed no historical resources on or near the project site; no historic-era resources on or in the vicinity of the project site have been listed on or formally found eligible to the CRHR or NRHP. The cannabis dispensary building across the street from the project site has been evaluated under the CRHR criteria and found ineligible. The former bowling alley to the north and historic-era houses to the south of the project site do not appear to have been previously evaluated for historic eligibility.

The proposed project would be within the boundary of the project site and would not create direct impacts to nearby properties.

Historical Resource Evaluation

This section presents the City of Sonoma's determination that the 1939 building at the project site (the Montaldo House) is eligible for the CRHR. The Montaldo House has been evaluated under the criteria and found eligible for the CRHR under Criterion 3 for its architecture. It qualifies as a historical resource pursuant to CEQA. The analysis provided in this section is based on the Historical Resources Evaluation (HRE) prepared for the project site and response memos from the City of Sonoma.

CRHR Evaluation

Criterion 1. (Event)*: Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.*

The 1939 house and associated landscape was constructed within land owned by "L. and M. I. Company", a real estate investment company owned Donald H. Maxwell. The company appears to have held the land since 1900, during a time when Sonoma Valley was a thriving hot springs resort community; however, the project site remained part of the larger parcel and was undeveloped. By the 1930s, most Sonoma Valley hot springs resorts had either closed or modified their accommodations and services. At this time, Maxwell began dividing up the land and selling smaller parcels of land for development, including housing and commercial buildings. It was shortly after this time that the 1939 house and associated landscape were constructed at the project site. As such, the single-family residence was not found to be associated with any event, including the early settlement of the Sonoma Valley, that made a significant contribution to the broad patterns of California's history and cultural heritage.

Therefore, the project site with its 1939 house and associated landscape is not individually eligible for listing in the CRHR under Criterion 1.

Criterion 2. (Person): *Is associated with the lives of persons important in our past.*

The ownership and occupancy history of the project site, including the 1939 house and associated landscape, was thoroughly researched. The site is associated with Charles James Montaldo who purchased it from the "L. and M. I. Company" as an investment. However, upon their marriage, Charles retained ownership of the site and presented the newly built home to his wife, Evelyn Louise Banchero. At the time Charles and Evelyn owned the property, Charles was employed at the Sonoma Post Office as the assistant postmaster. Charles started his employment at the Sonoma Post Office in 1925 as a "rural carrier" and later served as the City of Sonoma's assistant postmaster, as well as the acting postmaster, until 1972, when Charles retired from the Sonoma Post Office after 47 years of service. Although Charles dedicated 47 years of his life to public service, it does not appear that he is a person important in our past.

Therefore, the project site with its 1939 house and associated landscape is not individually eligible for listing in the CRHR under Criterion 2.

Criterion 3. (Construction/Architecture): *Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.*

Architecture: The 1939 house is associated with Ranch and Spanish Colonial Revival architecture. The house characterized by wing and gable form, a low-pitched cross-gable roof with shallow eaves and mission-style clay tiles, exposed wooden beams, wood casement and double-hung multi-light wood windows, an arcade and courtyard, clay coping and clay tile vents, a roof parapet, and central tower with an ornamental "punched" wood element, which are character-defining features of this design. As such, the 1939 house appears eligible for listing on the CRHR because it embodies the distinctive characteristics of the Ranch architecture with elements of Spanish Colonial Revival design, which were important architectural styles in the U.S. from 1930 to 1975, and 1910 to 1940, respectively.

The site landscape is not associated with any architectural style.

Architect: The 1939 house was designed by William F. Hebert. Herbert was an architect in Santa Rosa from the 1910s through the early 1940s. Herbert is not listed in the American Institute of Architects (AIA) directory or the Pacific Coast Architecture Database (a database of noted architects and engineers). Herbert graduated from MIT about 1913 and appears to have received his degree in architecture or a closely related field. He worked under noted architect William Weeks during the 1920s and oversaw several projects designed by Weeks. Herbert opened his own architectural practice in the 1920s, becoming Santa Rosa's first architect. During the early 1930s, he worked primarily on school buildings for the firm Herbert & Caulkins in partnership with architect Clarence A. Caulkins, AIA, until their partnership was dissolved in 1936. During his solo career, he designed houses, recreational, educational, and commercial buildings. Most of Herbert's projects were in Santa Rosa, but he also worked in nearby cities and counties, including the 1939 house at the project site. Hebert left California during WWII and worked for the Army Corps of Engineers. By the 1950s, he lived in Washington State. Herbert was an important regional architect from the 1920s until he left the area in 1942 and was recognized by the Santa Rosa City Council for his work developing the first California building code and his architecture contributions to the local built environment upon his death in 1972.

Builder: The builder of the 1939 house was Rudolph C. "Rube" Lange. Lange was active as a builder in Sonoma County from the 1920s through the early 1940s. Some of his known projects include the Nathanson Creek bridge on 2nd Street East in Sonoma, and a two-story house for Mary and Charles Stornetta Sr. at the Stornetta Dairy property on Carneros Highway (Highway 12; no longer extant) in Sonoma County. Based on extensive research, there is no indication that Lange's work as a builder possessed the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

Therefore, the 1939 house, characterized by its ranch style with Spanish Colonial Revival influences, is individually eligible for listing in the CRHR under Criterion 3 for its architecture.

Criterion 4. (Information potential): *Has yielded, or may be likely to yield, information important in prehistory or history.*

Criterion 4 most commonly applies to resources that contain or are likely to contain information bearing on an important archaeological research question. While most often applied to archaeological sites, Criterion 4 can also apply to buildings that contain important information. For a building to be eligible under Criterion 4, it must be a principal source of important information, such as exhibiting a local variation on a standard design or construction technique can be eligible if a study can yield important information, such as how local availability of materials or construction expertise affected the evolution of local building development.

The 1939 house and associated landscape do not convey information about the history of Ranch architecture with elements of Spanish Colonial design. Therefore, the 1939 house and associated landscape are not individually eligible for listing in the CRHR under Criterion 4.

Integrity

A property must possess significance under one or more of the above-listed criteria and have historic integrity to qualify for listing in the CRHR. There are seven aspects of historic integrity: location, design, setting, materials, workmanship, feeling, and association. A resource must possess the aspects of integrity that relate to the historical theme(s) and period of significance identified for the built-environment resources.

The following addresses the integrity of the 1939 house, which is eligible for the CRHR for its architectural significance under Criterion 3.

Location. The 1939 house remains in its original location. Therefore, the 1939 house retains integrity of location.

Design. There do not appear to have been any significant changes to the 1939 house. The house retains its Ranch- and Spanish Colonial Revival-style influences, including complex intersecting low-pitch roof forms with shallow eaves and mission clay tiles, a hipped-roof tower at the junction of front- and side-gabled volumes, a shed-roofed front arcade, a small hipped-roof area with decorative chimney at the south, and a flat-roofed volume to the rear. Other original design elements include the hand-troweled smooth and rough stucco cladding, wooden front door, arched picture window, and multi-light wood double-hung and casement windows. Therefore, the 1939 house retains integrity of design from 1939.

Setting. The surrounding setting of the 1939 house has changed significantly, as the area has grown into a commercial area; however, the setting within the project site remains relatively

unchanged from 1939. Therefore, the 1939 house retains integrity of setting within the project site.

Materials. The 1939 house retains integrity of materials from its original date of construction. The 1939 house materials include stucco, wood windows, wood doors, and clay roof tile. Therefore, the 1939 house retains integrity of materials.

Workmanship. Workmanship is evidenced by skill or craft from a particular period or region. The 1939 house consists of the knowledge and application of materials associated with woodworking and plasterwork. Therefore, the 1939 house retains integrity of workmanship.

Feeling. The integrity of feeling is the quality that a historic property has in evoking the aesthetic or historical sense of a past period. The 1939 house evokes the feeling of the Ranch-style with Spanish Colonial Revival influences, including arched features such as the arcade and the arched window, Spanish clay tiles, parapet, and stucco cladding. Therefore, the 1939 house retains integrity of feeling.

Association. The 1939 house retains an association with Ranch architecture with Spanish Colonial Revival elements. Therefore, the 1939 house retains integrity of association from its date of construction.

For the reasons described above, the 1939 house retains all seven aspects of integrity.

Period of Significance

The Period of Significance for historical resources eligible to the CRHR under Criterion 3 is the year of construction. Therefore, the Period of Significance for the Montaldo House 1939.

Character-defining features

The HRE finds the 1939 house at the project site eligible for its association with the Ranch and "Spanish Colonial Revival" architectural styles. Character-defining features of the house are:

- wing and gable form,
- Complex intersecting medium-pitch roof forms with minimal eaves and mission clay tiles, a hipped-roof tower at the junction of front- and side-gabled volumes, a shed-roofed front arcade, a small hipped-roof area with decorative chimney at the south, and a flat-roofed volume to the rear,
- exposed wooden beams within the front porch arcade,
- multi-light casement and double-hung wood windows,
- arcade and courtyard,
- clay coping and clay tile vents,
- roof parapet,
- ornamental "punched" wood screen on main façade of tower

- hand-troweled smooth and rough stucco cladding,
- multi-light glazed wooden front door, and
- arched picture window.

Impacts and Mitigation Measures

This section analyzes impacts related to historical resources of the Montaldo Apartments Project. It describes the methods used to determine the impacts that could occur with implementation of the Montaldo Apartments Project and lists the criteria used to conclude whether an impact would be significant. Mitigation measures are identified as necessary to reduce or avoid significant impacts.

Significance Criteria

The proposed project would have a significant impact on historical resources if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.

A "substantial adverse change" is defined by CEQA Guidelines Section 15064.5 as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired." The significance of a historical resource is "materially impaired," according to CEQA Guidelines Section 15064.5(b)(2), when a project "demolishes or materially alters in an adverse manner those physical characteristics" of the resource that:

1. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
2. Account for its inclusion in a local register of historical resources pursuant to Public Resources Code Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of Public Resources Code Section 5024.1(g), unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

As noted above, a project that would comply with the Secretary's Standards is considered to have mitigated its impact to a less-than-significant level (CEQA Guidelines Section 15064.5(b)(3)). Projects that do not comply with the Secretary's Standards may or may not cause a substantial adverse change in the significance of a historical resource and would require further analysis to determine whether the historical resource would be "materially impaired" by the project under CEQA Guidelines Section 15064.5(b).

Potential impacts to archaeological resources and the potential for the disturbance of human remains are evaluated in the cultural resources section of the Initial Study (**Appendix A**).

Approach to Analysis

Potential impacts on historical resources are assessed by identifying any activities (either during construction or operation) that could affect resources that have been identified as historical resources for the purposes of CEQA. Once a resource is identified, it then must be determined whether the proposed project would "cause a substantial adverse change in the significance" of the resource, as described above. As such, per CEQA Guidelines Section 15064.5(b)(2), the following analysis considers the potential for the proposed project to materially impair the significance of a historic resource by causing direct or indirect changes to the physical characteristics of the resource that convey its historical or architectural significance.

Approach to Cumulative Analysis

With respect to historical resources, cumulative projects in the project vicinity which would involve alteration, new construction, and/or intensity of land uses in the project site vicinity, could combine with the impacts of the proposed project to create a significant cumulative effect. The cumulative historical resource setting for the proposed project includes the cumulative effects from implementation of the projects described in **Section III.3, Cumulative Impact Analysis.**

Impact Evaluation

Impact CR-1: The proposed project may cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. (Significant Unavoidable)

As described in **Chapter II, Project Description**, the project proposes to demolish the Montaldo House, which qualifies as a historical resource pursuant to CEQA. 14 CCR 15064.5(b).

To assess the proposed project's potential impacts on the historical resource present at the project site, a qualified historic architecture consultant first prepared an HRE that determined the project site contained a historical resource. The findings of this HRE were confirmed by the city's consultant who determined that the house is eligible for listing in the California Register under Criterion 3 for its architecture and its association with the Ranch and "Spanish Colonial Revival" architectural styles. The house was also found to retain its integrity. The details about the findings of this determination are available in the HRE and Peer Review of HRE provided in **Appendix C** of this EIR.

The City evaluated the project for conformance with the Secretary's Standards and then evaluated whether or not the proposed project would cause material impairment to the identified historical resources on the site. The following is an analysis of the proposed project's conformance with the Secretary's Standards.

Standard 1 – *A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.*

Although the proposed project would redevelop the site for residential use, the project also proposes the demolition of the Montaldo House. Therefore, the project would maintain the residential use of the project site; however, it would remove the house including its character-defining features.

Therefore, the proposed project is not in conformance with Standard 1.

Standard 2 – *The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.*

As discussed above, under Standard 1, the proposed project would demolish the Montaldo House and therefore remove the historic materials that characterize this historical resource.

Therefore, the proposed project is not in conformance with Standard 2.

Standard 3 – *Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.*

The project proposes the demolition of the Montaldo House including its character-defining features in association with the Ranch and Spanish Colonial Revival architectural styles. As described in **Chapter II, Project Description,** the new buildings would reflect a contemporary version of Spanish architecture. Building 1, facing SR 12, would be a two-story building with archways framing the front doors. However, the proposed design of the new construction would be understood as new construction.

Therefore, the proposed project is not in conformance with Standard 3.

Standard 4 – *Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved*.

As discussed above, the Montaldo House was found to possess the aspects of integrity that relate to its historical theme and period of significance including its location, design, setting, materials, workmanship, feeling, and association. The proposed project would demolish the Montaldo House and therefore would not retain the historical resource in its existing location and none of its associated character-defining features would be preserved.

Therefore, the proposed project is not in conformance with Standard 4.

Standard 5 – *Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.*

As discussed above, the proposed project would demolish the Montaldo House and therefore remove the distinctive features, finishes, and craftsmanship that characterize of the historical resource.

Therefore, the proposed project is not in conformance with Standard 5.

Standard 6 – *Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.*

As discussed above, the proposed project would demolish the Montaldo House and therefore remove the historic features.

Therefore, the proposed project is not in conformance with Standard 6.

Standard 7 – *Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible*.

As discussed above, the proposed project would demolish the Montaldo House and no historic materials would be preserved.

Therefore, the proposed project is not in conformance with Standard 7.

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

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

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

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

The proposed project would demolish the Montaldo House and would redevelop the site with seven new buildings.

Therefore, the proposed project is not in conformance with Standard 9.

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

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

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

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

The impact of demolition of a historical resource generally cannot be mitigated to a less-than-significant level. The proposed project would be required to implement **Mitigation Measures M-**

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

Mitigation Measure CR-1a: Documentation of Historical Resources

Before any demolition activities within the project site, the applicant shall retain a professional who meets the Secretary of the Interior's Professional Qualification Standards for Architectural History to prepare written and photographic documentation of the Montaldo House. The documentation shall be based on the National Park Service's Historic American Building Survey (HABS). This type of documentation is based on the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation and the National Park Service's policy for photographic documentation, as outlined in the National Register and National Historic Landmarks Survey Photo Policy Expansion.

The documentation shall include the following elements:

- Accurate scaled mapping and architectural descriptions. If available, scaled architectural plans shall also be included;
- Photographs in large-format (4-inch by 5-inch) black-and-white negatives and 8-inch by 10-inch enlargements. Digital photography may be substituted for large-format negative photography if archived locally;
- A report containing site-specific history and appropriate contextual information. This information shall be gathered through site-specific and comparative archival research and oral history collection as appropriate; and
- The project applicant shall transmit such documentation to the City of Sonoma Planning Division for distribution to local libraries and/or preservation organizations. All documentation shall be scoped and then shall be reviewed and approved by the City of Sonoma before issuance of the demolition permit.

Mitigation Measure CR-1b: Interpretation

Before any demolition activities within the project site, the project applicant shall retain a qualified professional to design and undertake an appropriate interpretation of the affected historical resource and its setting. The interpretation shall be conducted by a professional Architectural Historian who meets the Secretary of the Interior's Professional Qualification Standards to prepare interpretation of the historical resource. This mitigation measure would supplement the traditional HABS/HALS documentation and would enhance the collection of reference materials that would be available to the public and inform future research. The Architectural Historian will work with the City of Sonoma Planning Division and local preservation advocates to choose an appropriate format for interpretation of the historical resource. Appropriate forms of interpretation may include: a curated display for a local library or museum, a website, or a short film.

The interpretation shall be reviewed and approved by the City of Sonoma prior to issuance of a demolition permit for the project. Archival copies of the documentation shall be submitted to the City of Sonoma.

Mitigation Measure CR-1c: Salvage Historic Resource

The project applicant shall give local historical societies or local architectural salvage companies the opportunity to salvage character-defining or significant features from the historical resource for public information or reuse in other locations. The project applicant shall contact local historical societies and architectural salvage companies and notify them of the available resources and make them available for removal. If, after 30 days, no organization is able and willing to salvage the significant materials, demolition can proceed.

SUMMARY

Mitigation Measures CR-1a, CR-1b would require documentation of the historic architectural resources within the project site. These mitigation measures are required to document and interpret the significance of the Montaldo House. Implementing mitigation measure **CR-1c** would provide historic materials available to the public and inform future research. The mitigation would partially compensate for the proposed project's impacts through comprehensive documentation and memorialization of the resource. However, these mitigation measures would not be enough to avoid, rectify, reduce, or compensate for the loss of the historic architectural resource at the project site to reduce impacts to a less-than- significant level. Only avoiding substantial adverse changes would reduce impacts to less-than-significant levels. Therefore, the impact of the project on the Montaldo House historical resource would remain ***significant and unavoidable with mitigation***.

CUMULATIVE IMPACTS

Impact C-CR-1: The proposed project, in combination with cumulative projects, could result in demolition of a historical resource, as defined in CEQA Guidelines Section 15064.5. (Less than Significant)

Section III.3, Cumulative Impact Analysis, describes the overall approach to the cumulative analysis used in this EIR and identifies the cumulative projects considered in this analysis. Project-related impacts on historic architectural resources would be site-specific and generally limited to the project's construction area. None of the cumulative projects fall within the boundaries of the project site or are otherwise related to the site through a shared historical association.

Therefore, the impacts of the proposed project would not combine with the impacts of other projects in the vicinity of the project site to result in a cumulative impact, and no further analysis is required. The impact would be ***less than significant***.

IV. OTHER CEQA ISSUES

IV.1 Growth-Inducing Impacts

Section 15126.2(d) of the California Environmental Quality Act (CEQA) Guidelines requires that an environmental impact report (EIR) discuss the growth-inducing impacts of a proposed action. A growth-inducing impact is defined in CEQA Guidelines Section 15126.2(e) as:

[T]he ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth ... It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project has the potential to induce growth both directly and indirectly. Direct growth inducement would result if a project would involve construction of new housing or construction of commercial development that attract new visitors. Indirect growth inducement would result, for instance, if implementing a project would result in any of the following:

- Substantial new housing or permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- A construction effort with substantial short-term employment opportunities that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; or
- Removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area) or adding development adjacent to undeveloped land.

Growth inducement itself is not an environmental effect, but it may lead to foreseeable environmental effects. Generally, a project that increases population is not viewed as having a significant impact on the environment unless the physical changes that would be needed to accommodate the project-related population growth would have adverse impacts on the environment. These environmental effects may include increased demand on other community and public services and infrastructure, increased traffic and noise, degradation of air or water quality, or loss of plant or animal habitats.

As discussed in **Section B.14, Population and Housing**, of the Initial Study in **Appendix A** of this Draft EIR, a residential population increase of approximately 99 is anticipated. Therefore, the proposed project would not substantially increase the population in the City of Sonoma.

The project is in a developed urban area with available access to necessary infrastructure and services (transportation, utilities, schools, parks, hospitals, etc.). The number of construction workers would vary throughout the 24 months of construction, depending on the specific construction phase. Construction of the proposed project would not cause substantial population growth or a substantial increase in housing demand in the region. It is anticipated that construction employees who are not already living in the City of Sonoma would likely commute from their residences elsewhere in the area rather than permanently relocate to the City from more distant locations; this is typical for employees in the various construction trades. Therefore,

construction of the proposed project would not exceed regional projections for employment in the City of Sonoma.

Typical growth-inducing factors might be the extension of urban services or transportation infrastructure to a previously unserved or underserved area, or the removal of major barriers to development from construction of utility infrastructure with the capacity to serve new growth. As discussed in **Chapter II, Project Description**, of this Draft EIR, the proposed project consists of construction of 50 apartment units on a site zoned as Housing Opportunity. The project site is surrounded by existing development and served by existing infrastructure. Since the project site is located in an established neighborhood and is not an infrastructure project, it would not indirectly induce substantial population growth.

As discussed in Section B.17, Transportation, of the Initial Study in **Appendix A** of this Draft EIR, the proposed project would not extend existing roadways into undeveloped areas or increase the capacity of other local or regional transportation facilities. As discussed in Section B.19, Utilities and Service Systems, of the Initial Study in **Appendix A** of this Draft EIR, existing utility infrastructure would have the capacity to serve the proposed project and would not induce growth indirectly through the extension of roads or other infrastructure.

IV.2 Significant and Unavoidable Environmental Effects

In accordance with CEQA Section 21100(b)(2)(A) and with Sections 15126(b) and 15126.2(c) of the CEQA Guidelines, the purpose of this section is to identify project-related environmental impacts that could not be avoided or reduced to a less-than-significant level with implementation of all feasible mitigation measures. The single-family residence at the project site was determined to be eligible for listing in the California Register of Historical Resources under Criterion 3 for its architecture, characterized by a ranch style with Spanish Colonial Revival influences. As discussed in Impact CR-1 in **Section III.4, Cultural Resources**, of this Draft EIR, demolition of a historic resource generally cannot be mitigated to a less-than-significant level. The project would demolish the Montaldo House and all the contributing features associated with this historic resource, and mitigation would not reduce the impact to less-than-significant levels. As a result, the project impact on historic resources would be *significant and unavoidable with mitigation*.

The environmental impacts of the project, including impacts on historic resources, are discussed in greater detail in **Section B.5, Cultural Resources**, of the Initial Study and **Appendix A**, Initial Study. The findings in this chapter are subject to final determination by the City of Sonoma as part of its certification of the EIR.

IV.3 Significant Irreversible Changes

In accordance with CEQA Guidelines Sections 15126(c), 15126.2(d), and 15127, the purpose of this section is to identify significant irreversible environmental changes that the proposed project would cause, including those that could result from environmental accidents. Such significant irreversible environmental changes might include current or future uses of nonrenewable resources, secondary or growth-inducing impacts that commit future uses of nonrenewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses. According to the CEQA Guidelines, irretrievable commitments of resources should be evaluated to ensure that such current consumption is justified. In general, such irretrievable commitments include the uses of resources such as energy and natural resources that would be required to sustain a project over its usable life.

No significant environmental damage, such as that resulting from accidental spills or the explosion of a hazardous material, is anticipated with the project construction and operation. Construction activities associated with the project would result in an irretrievable and irreversible commitment of power supply and construction materials. The project would require the commitment of energy resources used to fuel and maintain equipment used for construction and operation (such as gasoline, diesel, and oil). Project construction would also commit resources, such as concrete, steel, asphaltic concrete, and other construction materials, to be used for the apartment buildings and onsite alleys.

The project would involve the construction of multi-unit apartment buildings that would require electricity to operate. New buildings in California are required to conform to energy conservation standards specified in California Code of Regulations Title 24, which are among the most stringent in the United States. The standards establish energy budgets for different types of residential and nonresidential buildings with which all new buildings must comply. The proposed project must meet all applicable California and local building codes, provide onsite facilities for recycling and composting, which would ensure that natural resources are conserved or recycled to the maximum extent feasible and that the project's greenhouse gas emissions would be minimized.

The consumption of natural resources, including electricity and nonrenewable fuel sources, would generally increase with implementation of the project. However, as discussed in the Initial Study **Appendix A**, **Section B.6, Energy** of the Initial Study the project would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As described in the Initial Study in **Appendix A**, **Section B.19, Utilities and Service Systems**, the project's water demand would be accommodated within available water supplies and current water supply planning. The project would be designed to incorporate water-conserving measures, as required by the California Building Code. Therefore, although water use would increase as the result of project construction, and possibly under operation as well, the project would not involve the wasteful, inefficient, or unnecessary use of water resources.

IV.4 Areas of Known Controversy and Issues to be Resolved

Section 15123 of the CEQA Guidelines requires that an EIR summary identify each significant effect with proposed mitigation measures and alternatives that would reduce or avoid the effect; areas of controversy known to the lead agency, including issues raised by other agencies and the public; and issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects.

On July 12, 2024, the City of Sonoma issued a Notice of Preparation (NOP) of an EIR. In accordance with Section 15082 of the CEQA Guidelines, the City of Sonoma sent the NOP to potentially interested parties, including various federal, state, regional, and local agencies, organizations and persons who may have an interest in the proposed project. The City held a scoping meeting on August 1, 2024, to solicit comments on the scope of the EIR. The NOP is included in **Appendix B** of this document.

Known controversy is primarily focused on the proposed demolition of the single-family residence. Many commenters expressed their concern regarding a potential increase in traffic and the protection of the large valley oak tree.

V. ALTERNATIVES

V.1 Introduction

As required by CEQA, this chapter presents the alternatives analysis for the proposed Montaldo Apartments Project. The purpose of the CEQA alternatives analysis is to identify potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified for the project while still meeting most of the project objectives. This chapter describes both the methodology used to screen and select alternatives to the project and the results of the detailed alternatives analysis. For the alternatives selected for detailed analysis, the chapter evaluates the alternatives' impacts relative to existing environmental conditions and compares the potential impacts of the alternatives with those of the project. Based on this analysis, this chapter then identifies the environmentally superior alternative. Finally, other alternatives that were considered but eliminated from detailed analysis are presented together with the reasons for their elimination.

V.2 CEQA Requirements for Alternatives Analysis

Section 15126.6(a) of the CEQA Guidelines states that an EIR must describe and evaluate a reasonable range of alternatives to the project that would feasibly attain most of the project's basic objectives but would avoid or substantially lessen any identified significant adverse environmental effects of the project. The EIR must evaluate the comparative merits of the alternatives and include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the project. Specifically, the CEQA Guidelines (Section 15126.6) set forth the following criteria for selecting and evaluating alternatives:

- **Range of alternatives.** An EIR need not consider every conceivable alternative but must consider and discuss a reasonable range of feasible alternatives in a manner that will foster informed decision-making and public participation. The "rule of reason" governs the selection and consideration of EIR alternatives, requiring that an EIR set forth only those alternatives necessary to permit a reasoned choice. The lead agency is responsible for selecting a range of project alternatives to be examined and for disclosing its reasons for the selection of the alternatives. An EIR is not required to consider alternatives that are infeasible (Section 15126.6[a]). Factors that might be considered when addressing the feasibility of an alternative include site suitability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, economic viability, and whether the project proponent can reasonably acquire, control, or otherwise have access to an alternative site (Section 15126.6[f]). An EIR need not consider an alternative for which impacts cannot be reasonably ascertained and for which implementation is remote and speculative. The specific alternative of "no project" must also be evaluated (Section 15126.6[e][1]).

- **Ability to avoid or substantially reduce significant effects.** As required by CEQA Guidelines Section 15126.6[b], the discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

- **Ability to meet project objectives.** The range of potential alternatives shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects (Section 15126.6[c]).

V.3 Alternatives Selection

Consistent with CEQA, the City of Sonoma focused the approach to alternatives selection on identifying alternatives that meet most of the project's basic objectives while reducing the identified project significant impacts.

As explained further in the following sections, during the alternatives selection process, the City of Sonoma eliminated other potentially feasible alternatives or concepts from consideration because they would have had the same or more severe environmental impacts compared to the project or they would have been not feasible. The City of Sonoma retained three alternatives for detailed analysis. The ability of alternatives to meet the project objectives is evaluated in **Section V.12, Comparison of Alternatives Ability to Meet Project Objectives**.

V.4 Project Objectives

The project objectives are as follows:

1. Redevelop an underutilized site in an urban infill location with dwelling units and open space amenities.

2. Contribute to the General Plan's Housing Element goals and the Association of Bay Area Government's (ABAG's) Regional Housing Needs Allocation for the City of Sonoma.

3. Contribute to the City's goals for providing affordable housing units in the City of Sonoma.

4. Produce a high-quality architectural and landscape design that encourages variety, is compatible with its surrounding context, and promotes sustainability through environmentally sensitive design features that meet the requirements of the California Green Building Standards Code (CALGreen) and the California Energy Code.

5. Develop the project site to encompass ample open space amenities for building residents and encourage use of common residential open space.

6. Provide off-street vehicle parking that is adequate for the occupancy proposed pursuant to Section 19.48.040 of the Sonoma Municipal Code.

7. Construct a sufficient number of dwelling units to make redevelopment of the site economically feasible by producing a reasonable return on investment for the project sponsor and its investors, attracting investment capital and construction financing, and generating sufficient revenue to provide onsite affordable housing units.

V.5 Summary of Significant Environmental Impacts

Significant and Unavoidable Impacts

Project implementation would result in the following significant and unavoidable impact:

Historical Resources

The Montaldo House at the project site is considered a historical resource that is eligible for listing in the California Register of Historical Resources (California Register) for its architecture. The project would demolish the house, which would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5 (Impact CR-1).

Significant Impacts that can be Mitigated to Less Than Significant

Project implementation would result in significant impacts on air quality, archaeological resources and human remains, biological resources, geology and soils, noise, transportation, and tribal cultural resources, all of which would be reduced to a less-than-significant level with mitigation, as described in **Appendix A**.

V.6 Alternatives Screening and Selection

As stated above, the City of Sonoma based the alternatives selection process on identifying concepts for alternatives that would avoid or lessen the significant and unavoidable impact on the historical resource identified above. In developing alternatives, the City explored several approaches based on the location of the historical home on the project site and the project's objectives.

Given the historical resource's location fronting SR 12, the siting and location of new buildings presented a challenge in determining how to develop the site to accommodate the goals of the project. Additionally, it was a challenge to find the right balance between adapting the existing building to meet the project's objectives and still allowing for construction of new buildings on the site.

In preparing the alternatives, the City considered four full preservation alternatives and two partial preservation alternatives. Two full preservation alternatives and one partial preservation alternative were carried forward for detailed analysis. As explained in **Section V.15 – Alternatives Considered but Eliminated from Further Consideration**, the remaining alternative concepts were eliminated from further consideration.

The City found that the two preservation alternatives and one partial preservation alternative represent a reasonable range of alternatives for the EIR analysis, and would avoid or reduce the significant adverse effect of the project on the historic architectural resource.

This process resulted in the selection of three alternatives to be carried forward for detailed evaluation. The City determined that the three alternatives, along with the No Project Alternative, represent a reasonable range of alternatives described and analyzed in this EIR. **Section V.15** briefly describes the alternatives considered but ultimately rejected, and the rationale for rejection of these alternatives.

V.7 CEQA Alternatives and Potential Impacts

This chapter analyzes the following alternatives:

- No Project Alternative

- Southwest Site Access (Full Preservation Alternative)
- Onsite Relocation (Full Preservation Alternative)
- Partial Preservation Alternative

This section presents the following for each alternative:

- A description of the alternative, including revisions to the project components
- Analysis of the potential environmental impacts of the alternative compared to those of the project
- A brief assessment of the ability of the alternative to meet project objectives

V.8 No Project Alternative

Description

As required by CEQA Guidelines Section 15126.6(e), this EIR evaluates a no project alternative to allow decision- makers to compare the environmental effects of approving the project with the effects of not approving the project. The No Project Alternative represents what would reasonably be expected to occur in the foreseeable future if the project were not approved.

Under the No Project Alternative, no changes would be made to the project site at 19320 Sonoma Highway 12. The Montaldo House and all its associated building features would remain in their current conditions. The Montaldo house would remain in disrepair and boarded up, because it does not comply with current building codes and is unfit for current use. Construction and operation of the 50- apartments would not occur.

Environmental Impacts

The No Project Alternative would avoid the project's significant and unavoidable impact on the historical resource. As discussed below, the No Project Alternative would have no impacts, which would be fewer impacts than would result from the project.

Historical Resources

The No Project Alternative would avoid the significant and unavoidable impact of the project on the historical home at the site because no changes to the resource would occur.

The historical home is currently in disrepair and boarded up and secured against unwanted entry. It would remain in this state. The No Project Alternative would not result in any impacts on the historical resource. Mitigation Measures CR-1a, CR-1b, and CR-1c identified for the proposed project would not apply to this alternative.

Other Environmental Topics

Overall, the No Project Alternative would have reduced environmental effects relative to the proposed project, as explained further below.

Because no construction would occur under the No Project Alternative, it would not have any project-level or cumulative impacts relative to any of the topics analyzed in the Initial Study (**Appendix A**). Therefore, impacts of the No Project Alternative related to aesthetics, agriculture and forestry resources, air quality, biological resources, archaeological resources and human remains, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire would be less than those anticipated with implementation of the project because no construction, ground-disturbing activities, or changes to operations would occur. Because these impacts would be avoided, none of the mitigation measures identified for the project would be required under the No Project Alternative.

Ability to Meet Project Objectives

The No Project Alternative would not meet any of the project objectives, as discussed in greater detail in **Section V.12, Comparison of Alternatives Ability to Meet Project Objectives**.

V.9 Southwest Site Access (Full Preservation Alternative)

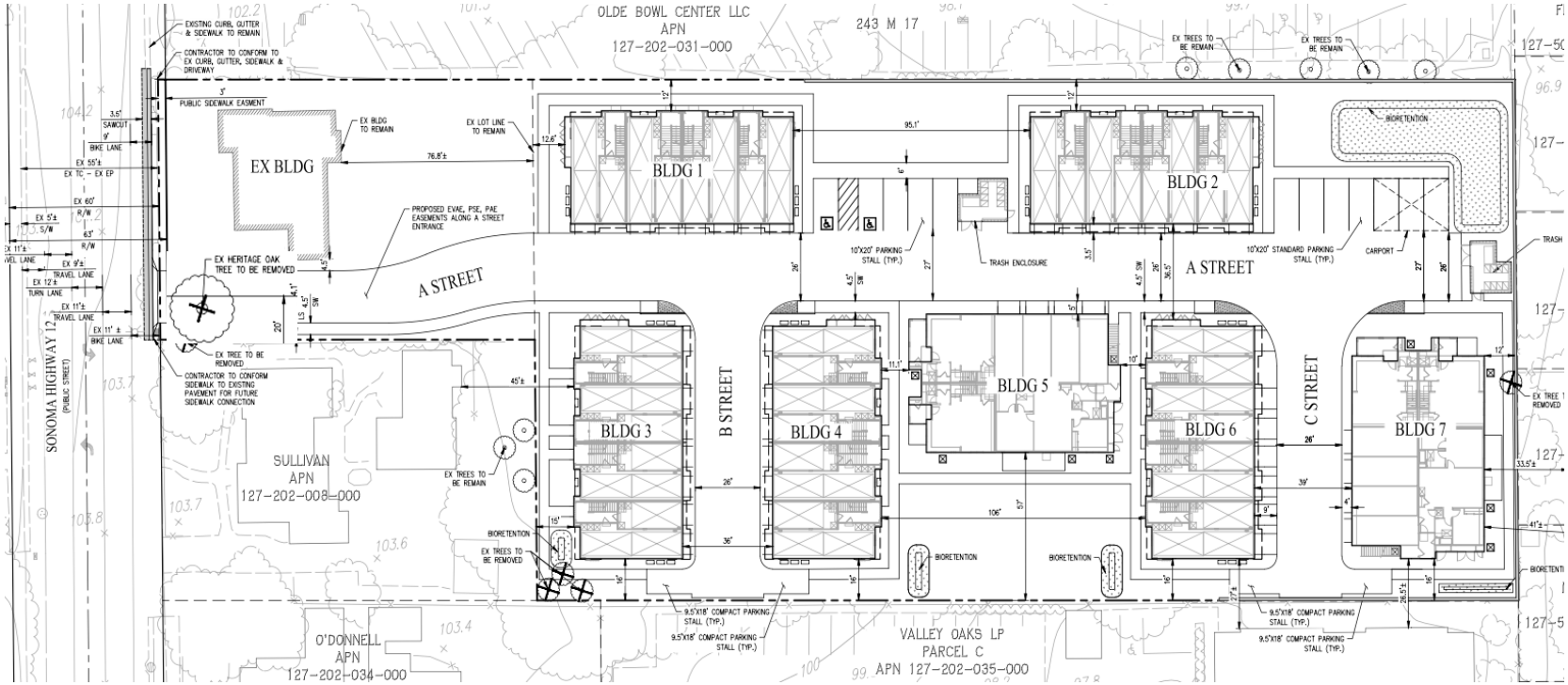
Description

The Southwest Site Access Alternative would preserve the existing single-family residence. Access to the project site would be provided south of the existing home along Sonoma Highway 12. This alternative would remove the large valley oak tree located at the southwest corner of the site to provide a 20-foot-wide drive aisle to the site. In addition, to construct 50 apartment units, the common open space provided under the proposed project would be replaced by one of the residential buildings. Site layout of this alternative is shown on **Figure 8**.

Because the existing home would be preserved, front setback under this alternative would be 25 feet. Interior setbacks from the north, east, and west side of the project side would be 10 feet.

This alternative would provide a total of 89 parking spaces with 68 garage stalls, 3 carports, and 18 open parking spaces. Apartment units would have a one-car garage or a 2-car garage.

Figure 8 – Southwest Site Access Alternative



Source: *cbg, 2023.*

Figure 8. Southwest Site Access Alternative

Environmental Impacts

As discussed below, the Southwest Site Access Alternative would avoid the significant and unavoidable impact of the project on the historic resource. All other impacts of the Southwest Site Access Alternative would be less than significant or less than significant with mitigation, similar to the project. However, while it would remain below the significance level, this alternative impact on biological resources would be comparatively higher than that of the proposed project because of the removal of the large valley oak tree.

Historical Resources

The Southwest Site Access Alternative would avoid the significant and unavoidable impact of the project on the historic house because it would preserve this resource. Under this alternative, the site would retain the distinctive characteristics of the Ranch architecture with elements of Spanish Colonial Revival design, which were important architectural styles in the U.S. from 1930 to 1975, and 1910 to 1940, respectively. The single-family residence would remain visible from the public right of way. Alterations to the site including construction of the new buildings and driveway would not result in significant impact on the historical resource. Therefore, impact of the Southwest Site Access Alternative on historic architectural resources would be less than significant. Mitigation Measures CR-1a, CR-1b, and CR-1c identified for the proposed project would not apply to this alternative.

Aesthetics

The Southwest Site Access Alternative would remove the large valley oak tree located at the southwest corner of the project site. Although the preservation of the historical house would maintain the scenic aspect of the site along SR 12, the tree removal would alter the visual character of the site along SR 12.

The City's Heritage Tree Ordinance defines a heritage tree as trees with 50 inches or more in diameter measured at 24 inches above natural grade. Although the tree is not classified as a heritage tree, its structure and location along Sonoma Highway 12 makes it a contributing aesthetic element to the surrounding area. The Planning Commission recommendations during the review of the project design included preserving the large oak tree to maintain the aesthetic pattern along Sonoma Highway 12. This project alternative would not fully comply with planning and design standards, such as preserving natural features. However, the Southwest Site Access Alternative would preserve the historical house and the project site would remain visually compatible with the surroundings.

Although the proposed project would alter the visual aspect of the site with the removal of the historical house, the Southwest Site Access Alternative would result in comparable visual impacts as it would remove the large valley oak tree. Therefore, visual impact of the Southwest Access Alternative would be similar to the proposed project.

Air Quality

This alternative would not include demolition of the historical house. Therefore, average daily construction emissions of criteria air pollutants, including fugitive dust and construction health risk impact from the Southwest Site Access Alternative would be reduced compared to the

project emissions. However, Mitigation Measures AIR-2 and AIR-3 identified for the proposed project would still be applicable to this alternative.

Biological Resources

The Southwest Site Access Alternative would remove the large valley oak tree, resulting in a greater adverse impact on biological resources compared to the proposed project.

The Tree Inventory Report prepared for the proposed project in 2023,[15] identified the tree in a fair health condition, with visible distress symptoms, and potential presence of pest or disease. The report determined that distressed health conditions of the tree are generally correctable. The tree structure was found to be normal with typical structural issues that can be corrected with pruning. The tree trunk size was found to be 48 inches at 54 inches above grade level. The tree height is 50 feet with a tree canopy of 30 feet. According to the City of Sonoma's Tree Ordinance, a "protected tree" is any tree designated to be preserved on an approved development plan or as a condition of approval of a tentative map, a tentative parcel map, or other development approval issued by the city.

The City's Planning Commission recommended the preservation of the large valley oak tree. Removal of the tree under this alternative would not meet the requirement of the City Tree Ordinance nor the recommendations of the City's Planning Commission.

Under this alternative, Mitigation Measures BIO-1a, BIO-1b, BIO-1c, and BIO-5 identified for the proposed project would be applicable. Although the impacts of the Southwest Site Access Alternative on biological resources would remain less than significant, similar to the proposed project, this alternative would result in a comparatively higher level of impact but would remain at a less-than-significant level with mitigation.

Recreation

The Southwest Site Access Alternative would not develop the project site to encompass similar open space amenities, as the proposed project, for building residents. Therefore, this alternative would create more demand on the nearby recreational facilities. However, impacts related to recreation under this alternative would remain less than significant, similar to the proposed project.

Other Environmental Topics

For all other topics, the Southwest Site Access Alternative would have environmental effects similar to those of the proposed project. This alternative would develop the site with 50-unit apartment buildings similar to the proposed project. It would require the same soil disturbance and construction duration. Therefore, this alternative would also have similar level of impact as the proposed project on agriculture and forestry resources, air quality, archaeological resources and human remains, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, transportation, tribal cultural resources, utilities

[15] Horticultural Associates. 2023. Updated Tree Inventory Report, 19320 Sonoma Highway, Sonoma, California. December 5.

and service systems, and wildfire. Mitigation measures identified for the proposed project, with the exception of Mitigation Measures CR-1a, CR-1b, and CR-1c would apply to this alternative.

Ability to Meet Project Objectives

The Southwest Site Alternative would fully or partially meet all project objectives, as discussed in greater detail in **Section V.12, Comparison of Alternatives Ability to Meet Project Objectives**.

V.10 Onsite Relocation (Full Preservation Alternative)

Description

Under the Onsite Relocation Alternative, the existing building would be relocated southward on the site to allow access from the north. This alternative would preserve the single-family residence as well as the valley oak tree. Similar to Southwest Site Access Alternative, to construct 50 apartment units, the common open space provided under the proposed project would be replaced by one of the residential buildings.

Similar to the Southwest Site Access Alternative, this alternative would provide a total of 89 parking spaces with 68 garage stalls, 3 carports, and 18 open parking spaces. Apartment units would have a one-car garage or a 2-car garage.

All other project components including pedestrian facilities and utilities would be similar to those under the proposed project.

Environmental Impacts

As discussed below, the Onsite Relocation Alternative would avoid the significant and unavoidable impact of the project on the historic resource. All other impacts of the Onsite Relocation Alternative would be less than significant or less than significant with mitigation, similar to the project.

Historical Resources

The Onsite Relocation Alternative would avoid the significant and unavoidable impact of the project on the historic house at the site because it would relocate the house on the same site to the south. Under this alternative, the house would not be demolished and would remain visible along SR-12. Alterations to the site including construction of the new buildings and driveway would not result in significant impact on the historical resource.

Pursuant to CEQA Guidelines, if relocation would alter a character defining feature of an historic resource, relocation would be considered to materially impair the resource's significance. Under the California Register criteria, a building may be moved and retain its historic status under certain circumstances. The State of California provides the following guidance on moving buildings:

The State Historical Resources Commission encourages the retention of historical resources on site and discourages the non-historic grouping of historic buildings into parks or districts. However, it is recognized that moving a historic building, structure, or object is sometimes necessary to prevent its destruction. Therefore, a moved building, structure, or object that is otherwise eligible may be listed in the California Register if it was moved to prevent its

demolition at its former location, and if the new location is compatible with the original character and use of the historical resource. A historical resource should retain its historic features and compatibility in orientation, setting, and general environment.

The single-family residence is fronting Sonoma Highway 12. Due to the challenges of finding a similar setting, the most suitable replication of this location and orientation is to relocate the home southward on the same site. Relocation is not appropriate mitigation for certain types of historical resources, such as those in extremely poor condition that would require reconstruction rather than rehabilitation.

Based on a visual structural assessment[16] performed for the single-family residence, the structural integrity of the home was determined to be potentially compromised and may require additional support or reinforcement to maintain its stability. The home has never been retrofitted. Rot and decay of framing members have compromised the support structure. In addition, evidence of excessive water damage was reported. The study also found that considering the year of construction of the single-family residence, hazardous construction materials, such as lead-based paint and asbestos could be present. The single-family residence may also lack modern fire safety features, such as fire-resistant construction materials and fire sprinkler systems. Furthermore, the study noted that the old single-family residence may not have adequate ventilation or insulation, which can lead to poor indoor air quality, humidity, and mold growth.

The City determined that the Montaldo home may require structural reinforcement, such as seismic retrofitting, foundation repair, and roof reinforcement, as well as other retrofitting activities such as fire and safety, accessibility, and weatherproofing. Upgrading for safety and efficiency, would require to be done while maintaining or restoring the original architectural elements of the house. Under this alternative, the historical house would be preserved and retain its location along SR-12. Mitigation Measures CR-1a and CR-1b, identified for the proposed project would still apply to this alternative to document the historical property in the event of any damage during the relocation process. Mitigation Measure CR-1c would not apply to this alternative because the Onsite Relocation Alternative would preserve the character defining features of the single-family residence. Therefore, impacts of the Onsite Relocation Alternative on historic architectural resources would be less than significant with mitigation.

Aesthetics

The Onsite Relocation Alternative would preserve the historical home and the large valley oak tree. However, to allow enough space for site access from the northeast side of the site, the house would be relocated behind the large valley oak tree. Under this alternative, the visual character of the site along SR 12 would slightly be modified. However, the preservation of the house and the tree would retain the visual quality of the site along SR 12. Aesthetic impacts of this alternative would be reduced compared to the project but would remain less than significant.

[16] Advanced Engineering. 2023. Visual Structural; Assessment. 19320 Sonoma Highway, Sonoma, CA. March 20.

Air Quality

This alternative would not include demolition of the historical house. Therefore, average daily construction emissions of criteria air pollutants, including fugitive dust and construction health risk impact from the Onsite Relocation Alternative would be reduced compared to the proposed project's emissions. Mitigation Measures AIR-2 and AIR-3 identified for the proposed project would still be applicable to this alternative.

Biological Resources

The Onsite Relocation Alternative would preserve the large valley oak tree. Therefore, impacts of this alternative on biological resources would be less than significant with mitigation, similar to the proposed project. Mitigation Measures BIO-1a, BIO-1b, BIO-1c, and BIO-5, identified for the proposed project, would apply to this alternative.

Noise

Construction noise related to the relocation of the historical home would be reduced compared to the proposed project because no demolition activities would occur under this alternative. Similar to the proposed project, the Onsite Relocation Alternative would be required to comply with the City's SMC Chapter 9.56, including restricting construction activities and material deliveries to the hours between 8 a.m. and 6 p.m. Monday through Friday, between 9 a.m. and 6 p.m. on Saturday, and between 10 a.m. and 6 p.m. on Sundays and holidays. Implementation of this alternative would also require noise level at any point outside of the property plane of the project not to exceed 90 dBA, in addition to installing sign postings at all site entrances upon commencement of construction to inform all construction workers of the allowable construction hours. Mitigation Measure NOI-1 would still apply to the Onsite Relocation Alternative. Noise impacts under the Onsite Relocation Alternative would be less than significant with mitigation.

Recreation

The Onsite Relocation Alternative would not develop the project site to encompass open space amenities, as the proposed project, for building residents. Therefore, this alternative would create more demand on nearby recreational facilities. However, impacts related to recreation under this alternative would remain less than significant, similar to the proposed project.

Transportation

Relocating the historical house under this alternative would increase the construction activities compared to the proposed project. Specialized machines required for moving the house, such as hydraulic jacks and hydraulic dollies may require temporary closure of the lanes near the project site, which would result in increasing traffic impact during construction compared to the proposed project. Similar to the proposed project, implementation of the Onsite Relocation Alternative would require an encroachment permit from Caltrans that would be submitted to the City once approved. Approval of the encroachment permit would require compliance with the City's applicable regulations, such as the preparation of a traffic control plan as part of the encroachment permit application. The plan would outline how traffic, including vehicles, pedestrians, and cyclists, would be safely directed around the construction site to minimize disruptions and ensure public safety during construction activities. Mitigation Measure TR-3, identified for the proposed project, would apply to this alternative. The transportation impact of

the Onsite Relocation Alternative would be higher compared to the proposed project. However, this impact would remain less than significant.

Other Environmental Topics

For all other topics, the Onsite Relocation Alternative would have environmental effects similar those of the proposed project and mitigation measures identified for the proposed project would apply to this alternative, with the exception of Mitigation Measures CR-1c would apply to this alternative. This alternative would develop the site with 50 apartment units similar to the proposed project. Therefore, this alternative would also have similar level of impact as the proposed project on agriculture and forestry resources, archaeological resources and human remains, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, tribal cultural resources, utilities and service systems, and wildfire.

Ability to Meet Project Objectives

The Onsite Relocation Alternative would fully or partially meet all the project objectives, as discussed in greater detail in **Section V.12, Comparison of Alternatives Ability to Meet Project Objectives**.

V.11 Partial Preservation Alternative

Description

The Partial Preservation Alternative would demolish the small extension of the historical house along its south side and maintain the rest of the house (**Figure 9**). This alternative would preserve the valley oak tree near SR 12. Similar to Southwest Site Access Alternative, to construct 50 apartment units, the common open space provided under the proposed project would be replaced by one of the residential buildings.

Similar to the Southwest Site Access Alternative, this alternative would provide a total of 89 parking spaces with 68 garage stalls, 3 carports, and 18 open parking spaces. Apartment units would have a one-car garage or a 2-car garage.

All other project components including pedestrian facilities and utilities would be similar to those under the proposed project.

Environmental Impacts

As discussed below, the Partial Preservation Alternative would avoid the significant and unavoidable impact of the project on the historical resource. However, as described below, this alternative would result in increased transportation impact compared to the proposed project. All other impacts of the Partial Preservation Alternative would be less than significant or less than significant with mitigation, similar to the project.

Historical Resources

Under the Partial Preservation Alternative, a small projecting south volume and courtyard/patio (**Figure 9**) would be demolished, and the balance of the house would be preserved and rehabilitated to support the management services of the proposed 50-unit apartment complex.

The Partial Preservation Alternative would retain most contributing elements and decorative features of the historic house. The wing and gable form and primary massing of the historic house would be retained since the section to be removed is a small projection that is set back from the street. Original features of the west elevation that are highly visible from SR-12 would be retained, including the arcade-style porch with its exposed wooden beams, decorative tower with its ornamental screen, complex clay tile roof form, and decorative chimney. Original wood casement windows and fully-glazed wooden front door would be retained, as would flat roof and double-hung windows at the rear and character-defining stucco cladding. Although the south volume of the building appears to be original and features character-defining wooden windows and doors, clay tile roof, and stucco cladding, it represents a small percentage of the original house. The courtyard may also be original, but its concrete masonry unit wall is not consistent with the materials used on the house and does not contribute to the Spanish Revival design aesthetic of the property.

Mitigation Measures CR-1a and CR-1b would apply to this alternative to document the historical property in the event of any damage during the partial demolition activities. Mitigation Measure CR-1c would not apply to this alternative because the Partial Preservation Alternative would preserve the character defining features of the single-family residence. Loss of the south volume and courtyard would have a negative impact on the integrity of the property since it is an original feature, but the negative impact would be less than significant with mitigation since the slightly altered house would retain all its character-defining features and would thus retain historic integrity.

Aesthetics

The Partial Preservation Alternative would preserve the historical home and the large valley oak tree. Other than removing the small projecting south volume and courtyard/patio this alternative would maintain the visual appearance of the site along SR 12. Therefore, this alternative would retain the visual quality of the site along SR 12. Aesthetic impacts of this alternative would be reduced compared to the project but would remain less than significant.

Air Quality

This alternative would include less demolition activities compared to the project. Therefore, average daily construction emissions of criteria air pollutants, including fugitive dust and construction health risk impact from the Partial Preservation Alternative would be reduced compared to the project emissions. Mitigation Measures AIR-2 and AIR-3 identified for the proposed project would still be applicable to this alternative.

Noise

This alternative would include less demolition activities compared to the project. Therefore, construction noise and vibration impacts would be reduced compared to the project emissions. Similar to the proposed project, the Partial Preservation Alternative would be required to comply with the City's SMC Chapter 9.56, including restricting construction activities and material deliveries to the hours between 8 a.m. and 6 p.m. Monday through Friday, between 9 a.m. and 6 p.m. on Saturday, and between 10 a.m. and 6 p.m. on Sundays and holidays. Implementation of this alternative would also require noise level at any point outside of the project site boundaries not to exceed 90 dBA, in addition to installing sign postings at all site entrances upon commencement of construction to inform all construction workers of the allowable construction hours. Mitigation Measure NOI-1 would still apply to this alternative. Noise impacts under the

Partial Preservation Alternative would be less than significant with mitigation, similar to the proposed project.

Recreation

The Partial Preservation Alternative would not develop the project site to encompass open space amenities, as the proposed project, for building residents. Therefore, this alternative would create more demand on nearby recreational facilities. However, impacts related to recreation under this alternative would remain less than significant, similar to the proposed project.

Transportation

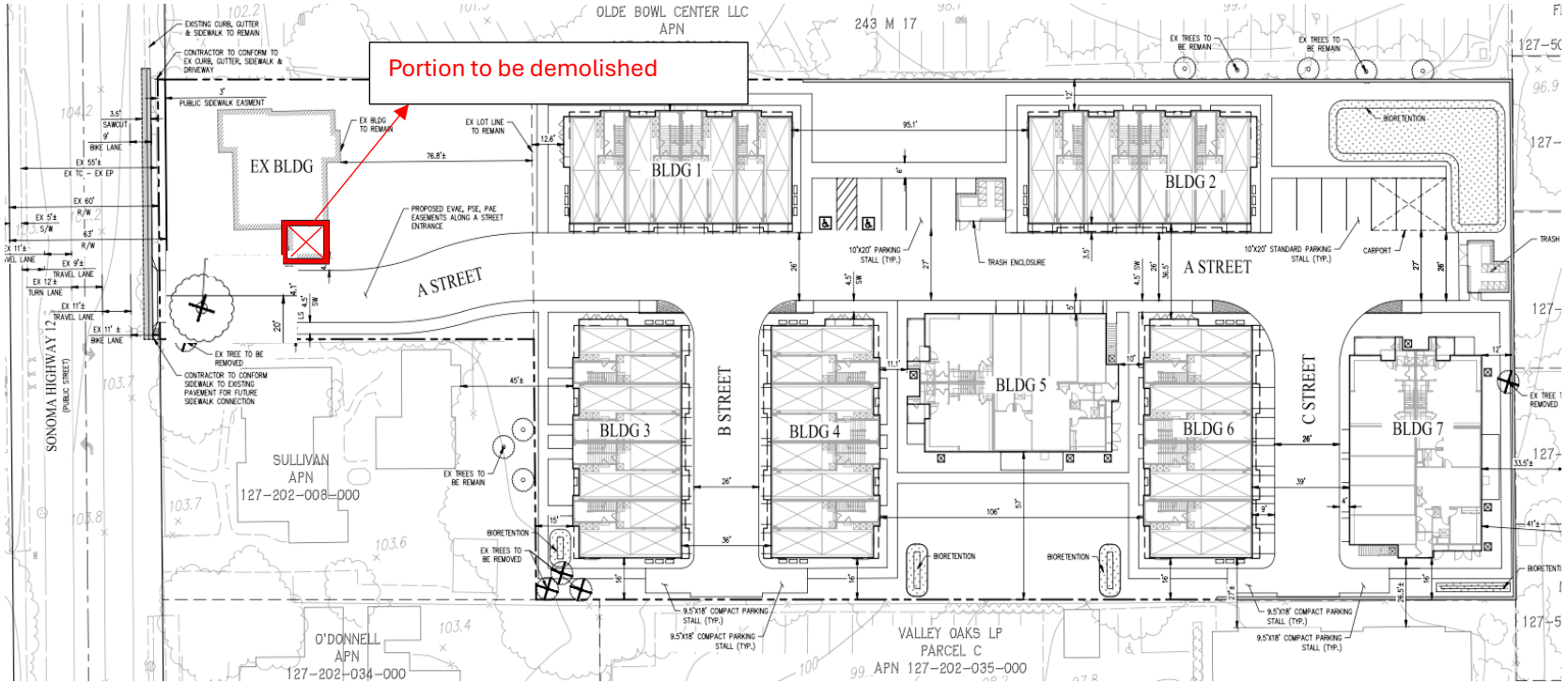
This alternative would maintain the existing access to the project site. While the site alley would be enlarged with the removal of the small projecting south volume and courtyard/patio of the historical house, site access would be constrained due to the limited width of the alley, and the restricted maneuvering space for cars and emergency vehicles. Mitigation Measure TR-3, identified for the proposed project, would apply to this alternative. However, even with the implementation of Mitigation Measure TR-3, long-term transportation impact of this alternative associated with site access would be higher than those under the proposed project.

Other Environmental Topics

For all other topics, the Partial Preservation Alternative would have environmental effects similar to or less than those of the project for the same reasons as discussed above for the Southwest Access Alternative, and all identified mitigation measures would apply to this alternative.

Ability to Meet Project Objectives

The Partial Preservation Alternative would fully or partially meet all the project objectives, as discussed in greater detail in **Section V.12, Comparison of Alternatives Ability to Meet Project Objectives**.



Source: *cbg, 2023.*

Figure 9. Partial Preservation Alternative

V.12 Comparison of Alternatives Ability to Meet Project Objectives

Table V.1, summarizes the ability of the three alternatives to meet project objectives, listed in **Section V.4.** The No Project Alternative is included, as required by CEQA Guidelines 15126.6(e), even though it would not meet the basic project objectives.

Table V.1 – Comparison of Alternatives Ability to Meet Project Objectives

Project Objectives	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
Would the alternative meet the project objective?				
Redevelop an underutilized site in an urban infill location with dwelling units and open space amenities.	No. The site would be left unchanged and would not be developed with 50 apartment units. No changes would be made to the historical house. The house is currently boarded up and would remain in this state for the foreseeable future.	Partially. The site would be redeveloped with 50 apartment units in seven 2- and 3-story residential buildings. The site would not include a common open space area.	Partially. The site would be redeveloped with 50 apartment units in seven 2- and 3-story residential buildings. The site would not include a common open space area.	Partially. The site would be redeveloped with 50 apartment units in seven 2- and 3-story residential buildings. The site would not include a common open space area.
Contribute to the General Plan's Housing Element goals and the Association of Bay Area Government's (ABAG's) Regional Housing Needs Allocation for the City of Sonoma.	No. The site would be left unchanged and would not be developed with 50 apartment units.	Yes. The site would be redeveloped with 50 apartment units and would include 13 affordable housing units (26 percent of the total residential units), with two of the units allocated for extremely-low-income households, three of the units allocated for very-low-income households, and the remaining eight units allocated for low-income households.	Yes. The site would be redeveloped with 50 apartment units and would include 13 affordable housing units (26 percent of the total residential units), with two of the units allocated for extremely-low-income households, three of the units allocated for very-low-income households, and the remaining eight units allocated for low-income households.	Yes. The site would be redeveloped with 50 apartment units and would include 13 affordable housing units (26 percent of the total residential units), with two of the units allocated for extremely-low-income households, three of the units allocated for very-low-income households, and the remaining eight units allocated for low-income households.
Contribute to the City's goals for	No.	Yes.	Yes.	Yes.

Project Objectives	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
Would the alternative meet the project objective?				
providing affordable housing units in the City of Sonoma.	The site would be left unchanged and would not be developed with 50 apartment units.	The site would be redeveloped with 50 apartment units and would include 13 affordable housing units (26 percent of the total residential units), with two of the units allocated for extremely-low-income households, three of the units allocated for very-low-income households, and eight units allocated for low-income households.	The site would be redeveloped with 50 apartment units and would include 13 affordable housing units (26 percent of the total residential units), with two of the units allocated for extremely-low-income households, three of the units allocated for very-low-income households, and eight units allocated for low-income households.	The site would be redeveloped with 50 apartment units and would include 13 affordable housing units (26 percent of the total residential units), with two of the units allocated for extremely-low-income households, three of the units allocated for very-low-income households, and eight units allocated for low-income households.
Produce a high-quality architectural and landscape design that encourages variety, is compatible with its surrounding context, and promotes sustainability through environmentally sensitive design features that meet the requirements of the California Green Building Standards Code (CALGreen) and the California Energy Code.	No. The site would be left unchanged and would not be developed with 50 apartment units.	Yes. The proposed development under this alternative would be in compliance with the California Green Building Code.	Yes. The proposed development under this alternative would be in compliance with the California Green Building Code.	Yes. The proposed development under this alternative would be in compliance with the California Green Building Code.
Develop the project site to encompass ample open space amenities for building residents and	No. The site would be left unchanged and would not be developed with	Partially. Common open space area would be minimal.	Partially. Common open space area would be minimal.	Partially. Common open space area would be minimal.

Project Objectives	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
Would the alternative meet the project objective?				
encourage use of common residential open space.	50 apartment units.			
Provide off-street vehicle parking that is adequate for the occupancy proposed pursuant to Section 19.48.040 of the Sonoma Municipal Code.	No. The site would be left unchanged and would not be developed with 50 apartment units.	Yes. The development would provide a total of 89 parking spaces with 68 garage stalls, 3 carports, and 18 open parking spaces.	Yes. The development would provide a total of 89 parking spaces with 68 garage stalls, 3 carports, and 18 open parking spaces.	Yes. The development would provide a total of 89 parking spaces with 68 garage stalls, 3 carports, and 18 open parking spaces.
Construct a sufficient number of dwelling units to make redevelopment of the site economically feasible by producing a reasonable return on investment for the project sponsor and its investors, attracting investment capital and construction financing, and generating sufficient revenue to provide onsite affordable housing units.	No. The site would be left unchanged and would not be developed with 50 apartment units.	Partially. The site would be redeveloped with 50 apartment units including 13 affordable units. Maintaining the house could impose additional financial burdens on the project without providing corresponding benefits, thereby diminishing its appeal to investors.	Partially. The site would be redeveloped with 50 apartment units including 13 affordable units. Relocating the historical house and maintaining it would impose additional financial burdens on the project without providing corresponding benefits, thereby diminishing its appeal to investors which could ultimately render the project economically unfeasible.	Partially. The site would be redeveloped with 50 apartment units including 13 affordable units. Relocating the historical house and maintaining it could impose additional financial burdens on the project without providing corresponding benefits, thereby diminishing its appeal to investors.

V.13 Comparison and Summary of Impacts of the Alternatives

Table V.2 details the environmental effects of the alternatives relative to those identified for the project.

Table V. 2 – Environmental Impacts of the Project Alternatives Relative to Project Impacts

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
Aesthetics				
Have a substantial adverse effect on scenic vista? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Reduced compared to project because it would preserve both the historical house and the large valley oak tree *(LTS)*	Reduced because it would result in minor modification to the existing site frontage conditions. *(LTS)*
Result a substantial adverse effect on scenic resources, including those within view of a state scenic highway? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Reduced compared to project because it would preserve both the historical house and the large valley oak tree. *(LTS)*	Reduced because it would result in minor modification to the existing site frontage conditions. *(LTS)*
In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings, or conflict with applicable zoning and other regulations governing scenic quality? (LTS)	Less than project *(NI)*	Similar to project *(LTS)*	Reduced compared to project because it would preserve both the historical house and the large valley oak tree. *(LTS)*	Reduced because it would result in minor modification to the existing site frontage conditions. *(LTS)*
Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Result in significant cumulative impact related to aesthetics? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
Agriculture and Forestry Resources				
Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance? (*NI*)	Similar to project *(NI)*	Similar to project *(NI)*	Similar to project *(NI)*	Similar to project *(NI)*
Conflict with existing zoning for agricultural use, or a Williamson Act contract? (*NI*)	Similar to project *(NI)*	Similar to project *(NI)*	Similar to project *(NI)*	Similar to project *(NI)*
Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)), or result in the loss of forest resources? (*NI*)	Similar to project *(NI)*	Similar to project *(NI)*	Similar to project *(NI)*	Similar to project *(NI)*
Result in the loss of forest land or conversion of forest land to non-forest use? (*NI*)	Similar to project *(NI)*	Similar to project *(NI)*	Similar to project *(NI)*	Similar to project *(NI)*
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? (*NI*)	Similar to project *(NI)*	Similar to project *((NI)*	Similar to project *(NI)*	Similar to project *(NI)*
Air Quality				
Conflict with or obstruct implementation of the applicable air quality plan? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Result in a cumulatively considerable net increase of any criteria pollutant for which the	Less than project *(NI)*	Reduced compared to project because	Reduced compared to project because	Reduced compared to project because

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
project region is non-attainment under an applicable federal or state ambient air quality standard? (*LTSM*)		less demolition. (*LTSM*)	less demolition. (*LTSM*)	less demolition. (*LTSM*)
Expose sensitive receptors to substantial pollutant concentrations? (*LTSM*)	Less than project *(NI)*	Reduced compared to project because less demolition (*LTSM*)	Reduced compared to project because less demolition (*LTSM*)	Reduced compared to project because less demolition (*LTSM*)
Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
In combination with reasonably foreseeable future development, would result in a significant cumulative air quality impact? (*LTSM*)	Less than project *(NI)*	Similar to project (*LTSM*)	Similar to project (*LTSM*)	Similar to project (*LTSM*)
Biological Resources				
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? (*LTSM*)	Less than project *(NI)*	Similar to project (*LTSM*)	Similar to project (*LTSM*)	Similar to project (*LTSM*)
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? (*NI*)	Similar to project *(NI)*	Similar to project *(NI)*	Similar to project *(NI)*	Similar to project *(NI)*
Have a substantial adverse effect on state	Similar to project *(NI)*	Similar to project *(NI)*	Similar to project *(NI)*	Similar to project *(NI)*

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (*NI*)				
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? (*LTS*)	Less than project (NI)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (*LTSM*)	Less than project *(NI)*	Greater compared to project because the large valley oak tree would be removed. (*LTSM*)	Similar to project (*LTSM*)	Similar to project (*LTSM*)
Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (*NI*)	Similar to project *(NI)*	Similar to project *(NI)*	Similar to project *(NI)*	Similar to project *(NI)*
In combination with cumulative projects, would result in significant cumulative impacts on biological resources? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Cultural Resources				
Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5? (*SU*)	Less than project *(NI)*	Reduced compared to *(LTS)*	Reduced compared to project (*LTSM*)	Reduced compared to project (*LTSM*)

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? (*LTSM*)	Less than project *(NI)*	Similar to project (*LTSM*)	Similar to project (*LTSM*)	Similar to project (*LTSM*)
Disturb any human remains, including those interred outside of dedicated cemeteries? (*LTSM*)	Less than project *(NI)*	Similar to project (*LTSM*)	Similar to project (*LTSM*)	Similar to project (*LTSM*)
In combination with cumulative projects, would result in demolition of a historical resource, as defined in CEQA Guidelines Section 15064.5? (*LTS*)	Less than project *(NI)*	Reduced compared to project *(LTS)*	Reduced compared to project *(LTS)*	Reduced compared to project *(LTS)*
In combination with cumulative projects, would result in significant cumulative impacts to archaeological resources or human remains? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Energy				
Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
In combination with cumulative projects, would result in significant cumulative impacts related to the wasteful, inefficient, or unnecessary consumption of energy	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (*LTS*)				
Geology and Soils				
Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction or landslide? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Result in substantial soil erosion or the loss of topsoil? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Require the use of septic tanks or alternative wastewater disposal systems?*(NA)*	Similar to project *(NA)*	Similar to project *(NA)*	Similar to project *(NA)*	Similar to project *(NA)*
Directly or indirectly destroy a unique paleontological resource	Less than project *(NI)*	Similar to project (*LTSM*)	Similar to project (*LTSM*)	Similar to project (*LTSM*)

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
or site or unique geologic feature? (*LTSM*)				
In combination with cumulative projects, would result in significant cumulative impacts on geology, soils, or paleontological resources? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Greenhouse Gas Emissions				
Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project (*(LTS)*
Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (*LTS*)	Less than project *(NI)*	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Hazards and Hazardous Materials				
Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
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? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
of an existing or proposed school? (*LTS*)				
Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)
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? (*NI*)	Less than project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)
Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
In combination with cumulative projects, would result in a significant cumulative impact related to hazards and hazardous materials? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Hydrology and Water Quality				
Violate any water quality standards or waste discharge requirements	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
or otherwise substantially degrade surface or groundwater quality? (*LTS*)				
Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)
Conflict with or obstruct implementation of a water quality control plan or sustainable	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
groundwater management plan? (*NI*)				
In combination with cumulative projects, would result in a significant cumulative impact on hydrology and water quality? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Land Use and Planning				
Physically divide an established community? (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)
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? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
In combination with cumulative projects, would not result in a significant cumulative impact related to land use and planning? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Mineral Resources				
Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state, or locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)
Noise				
Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards	Less than project (*NI*)	Similar to project (*LTSM*)	Reduced compared to project because it would less demolition	Reduced compared to project because it would include less demolition

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
established in the local general plan or noise ordinance, or applicable standards of other agencies? (*LTSM*)			activities. (*LTSM*)	activities. (*LTSM*)
Generation of excessive groundborne vibration or groundborne noise levels? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Reduced compared to project because it would include less demolition activities *(LTS)*	Reduced compared to project because it would include less demolition activities *(LTS)*
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? (*NI)*	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)
In combination with cumulative projects, would not result in a significant cumulative impact on noise? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Population and Housing				
Induce substantial unplanned population growth in an area, either directly or indirectly? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)
in combination with cumulative projects, would not result in a significant cumulative impact related to	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
population and housing? (*LTS*)				
Public Services				
Result in an increase in demand for fire protection, police protection, schools, or other services to an extent that would result in substantial adverse physical impacts associated with the construction or alteration of governmental facilities? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
In combination with cumulative projects, would not result in significant cumulative impacts on police, fire, and school district services such that new or physically altered facilities, the construction of which could cause significant environmental impacts, would be required in order to maintain acceptable levels of service? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Recreation				
Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or such that the project would require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? (*LTS*)	Less than project (*NI*)	Greater compared to project because it would not provide common open space. *(LTS)*	Greater compared to project because it would not provide common open space. *(LTS)*	Greater compared to project because it would not provide common open space. *(LTS)*

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
In combination with cumulative projects, would result in significant cumulative impacts related to recreation? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Transportation				
Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Greater compared to project because of the possible lane closure *(LTS)*	Similar to project *(LTS)*
Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Similar to project *(LTS)*
Substantially increase hazards due to a geometric design feature? (*LTSM*)	Less than project (*NI*)	Similar to project (*LTSM*)	Similar to project (*LTSM*)	Greater compared to project because of the restricted site access (*LTSM*)
Result in inadequate emergency access? (*LTS*)	Less than project (*NI*)	Similar to project *(LTS)*	Similar to project *(LTS)*	Greater compared to project because of the restricted site access *(LTS)*
In combination with cumulative projects, would not result in a significant construction-related cumulative impact on transportation and circulation? (*LTSM*)	Less than project (*NI*)	Similar to project (*LTSM*)	Similar to project (*LTSM*)	Similar to project (*LTSM*)
Tribal Cultural Resources				
Result in a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074? (*LTSM*)	Less than project (*NI*)	Similar to project (*LTSM*)	Similar to project (*LTSM*)	Similar to project (*LTSM*)

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
Utilities and Service Systems				
Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (*LTS*)	Less than project (*NI*)	Similar to project (*LTS*)	Similar to project (*LTS*)	Similar to project (*LTS*)
Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (*LTS*)	Less than project (*NI*)	Similar to project (*LTS*)	Similar to project (*LTS*)	Similar to project (*LTS*)
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? (*LTS*)	Less than project (*NI*)	Similar to project (*LTS*)	Similar to project (*LTS*)	Similar to project (*LTS*)
Result in significant impact related to the generation of solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? (*LTS*)	Less than project (*NI*)	Similar to project (*LTS*)	Similar to project (*LTS*)	Similar to project (*LTS*)
Comply with federal, state, and local statutes and regulations related to solid waste? (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (*NI*)	Similar to project (NI)

Impact of Project	No Project Alternative	Southwest Site Access Alternative	Onsite Relocation Alternative	Partial Preservation Alternative
In combination with cumulative projects, would result in significant cumulative impacts on utilities and service systems? (*LTS*)	Less than project (*NI*)	Similar to project (*LTS*)	Similar to project (*LTS*)	Similar to project (*LTS*)
Wildfire				
Substantially impair an adopted emergency response plan or emergency evacuation plan? (*LTS*)	Less than project (*NI*)	Similar to project (*LTS*)	Similar to project (*LTS*)	Similar to project (*LTS*)
Expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? (*LTS*)	Less than project (*NI*)	Similar to project (*LTS*)	Similar to project (*LTS*)	Similar to project (*LTS*)
Require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? (*LTS*)	Less than project (*NI*)	Similar to project (*LTS*)	Similar to project (*LTS*)	Similar to project (*LTS*)
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? (*LTS*)	Less than project (*NI*)	Similar to project (*LTS*)	Similar to project (*LTS*)	Similar to project (*LTS*)
Substantially contribute to significant cumulative wildfire impact? (*LTS*)	Less than project (*NI*)	Similar to project (*LTS*)	Similar to project (*LTS*)	Similar to project (*LTS*)

NOTES:
NI = No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable with mitigation; NA = not applicable.

V.14 Environmentally Superior Alternative

The No Project Alternative would avoid all construction-related and operational impacts that were identified for the proposed project, including the significant and unavoidable impact on the historical resource. In its current state, the historical house is boarded up and secured against

unwanted entry and would remain in this state under the No Project Alternative. Although it would not have any significant environmental impacts, the No Project Alternative also would not meet any of the project objectives and would leave the site unused.

The Southwest Site Access Alternative would avoid the significant and unavoidable impact of the proposed project on the historical resource. However, this alternative would not preserve the large valley oak tree and therefore result in greater impact on biological resources. It would also result in greater impacts on recreational facilities because it would not include a common open space. The Southwest Site Access Alternative would not result in any new significant environmental impacts. This alternative would meet or partially meet project objectives as shown in **Table V.1**.

The Onsite Relocation Alternative would reduce the impact of the project on the historical resource since the resource would be preserved in another location on the site, but not to a less-than-significant level without mitigation. This alternative would preserve the large valley oak tree and therefore would have reduced impacts on biological resources compared to the proposed project. The Onsite Relocation Alternative would have reduced temporary, construction-related air quality and noise impacts because although similar amounts of construction activity would be needed to relocate and rehabilitate the building, less demolition would be required. The Onsite Relocation Alternative would not result in any new significant environmental impacts.

Although the Onsite Relocation Alternative would meet or partially meet the project objectives (as shown in **Table V.1**). The relocation of historical home would reduce the ability of the Onsite Relocation Alternative to meet the project objective of redeveloping the site in an economically viable manner.

The Partial Preservation Alternative would reduce the impact of the project on the historical resource, but not to a less-than-significant level without mitigation. This alternative would have construction-related and operational impacts on air quality, noise, biological resources, and paleontological resources that would be similar to those of the project. However, this alternative would result in greater transportation impact because site access would be constrained due to the limited width of the driveway, and the restricted maneuvering space for cars and emergency vehicles.

Based on the preceding evaluation, the Onsite Relocation Alternative is currently the environmentally superior alternative among the project alternatives (other than the No Project Alternative) because it would preserve the house on site in another location and preserve the large valley oak tree. The Onsite Relocation Alternative would have reduced impacts related to historical resources, biology, noise, and air quality, and would not cause any other significant impacts.

V.15 Alternatives Considered but Eliminated from further Analysis.

- **Façade Preservation**: The City considered partially demolishing the historical house and preserving the façade along SR 12.

- **North Access to the Project Site**: The City considered the possibility of providing access to the site from the Olde Bowl Center and preserving both the single-family home and the large valley oak tree.

- **South Access to the Project Site**: The City considered providing access to the site from the parking of the multiple-unit residential complex located to the south of the project site.

- **Alternative Project Location:** The City evaluated the availability of alternative sites for a 50-unit project. However, the project site has been specifically identified for housing in the City's Housing Element to meet the City's regional housing needs allocation for multiple cycles. There are no available sites of this size available for multifamily housing. In addition, the project site is already owned by the developer who does not have another similarly-sized site in the City for this project.

The Façade Preservation Alternative was found not feasible because of a combination of technical and design-related challenges. Both the North Access and South Access alternatives were found not feasible because they would result in impacts related to traffic congestion, reduced parking availability, safety, maintenance and liability, privacy and security concerns, as well as noise.

VI. LIST OF PREPARERS

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