SONOMA COUNTY
PERMIT SONOMA

# *INITIAL STUDY*
# *PROPOSED MITIGATED NEGATIVE DECLARATION*

Publication Date: August 16, 2024
Public Review Period: August 16, 2024 – September 16, 2024
State Clearinghouse Number: _____
Permit Sonoma File Number: DRH19-0006
Prepared by: Jennifer Faso
Phone: (707) 565-1683

Pursuant to Section 15071 of the State California Environmental Quality Act (CEQA) Guidelines, this proposed Mitigated Negative Declaration (MND), and the attached Expanded Initial Study (EIS), constitute the environmental review conducted by the County of Sonoma as lead agency for the proposed project described below:

| | |
|---|---|
| **Project Name:** | Sebastopol Self-Storage |
| **Project Applicant/Operator:** | Platinum Storage Group |
| **Project Location/Address:** | 1382 Highway 116 South, Sebastopol, CA |
| **APN:** | 063-011-017 |
| **General Plan Land Use Designation:** | Limited Commercial |
| **Zoning Designation:** | LC (Limited Commercial) |
| **Decision Making Body:** | Design Review Committee |
| **Appeal Body:** | Planning Commission |
| **Project Description:** | **See Item III, below** |

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation" as indicated in the attached Initial Study and in the summary table below.

**Table 1. Summary of Topic Areas**

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

**RESPONSIBLE AND TRUSTEE AGENCIES**

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

**Table 2. Responsible and Trustee Agencies**

| Agency | Activity | Authorization |
|---|---|---|
| Caltrans | Highway 116 frontage | Reviewing Agency |
| Bay Area Air Quality Management District (BAAQMD) | Dust Generation during Construction | BAAQMD CEQA Air Quality Guidelines |
| State Water Resources Control Board | Generating stormwater (construction, industrial, or municipal) | National Pollutant Discharge Elimination System (NPDES) requires submittal of Notice Of Intent (NOI) |

**ENVIRONMENTAL FINDING:**

Based on the evaluation in the attached Expanded Initial Study, I find that the project described above will not have a significant adverse impact on the environment, provided that the mitigation measures identified in the Initial Study are included as conditions of approval for the project and a Mitigated Negative Declaration is proposed. The applicant has agreed in writing to incorporate identified mitigation measures into the project plans.

Jennifer Faso
_____

Prepared by: Jennifer Faso, Project Planner August 16, 2024

*Expanded Initial Study*

**Sonoma County Permit and Resource Management Department**
2550 Ventura Avenue, Santa Rosa, CA 95403
(707) 565-1900 FAX (707) 565-1103

# I. INTRODUCTION

Platinum Storage Group proposes to construct an 89,856-square-foot self-storage facility, providing approximately 745 storage units, on a 4.03-acre portion of a 11.34-acre site located at 1382 Highway 116 South, Sebastopol, in unincorporated Sonoma County. Two existing commercial buildings (West County Glass Company and Discount Alley) will be demolished to allow the development of the self-storage facility. An existing market (Sequoia Market), a fast-food restaurant (Sequoia Burger), and a single-family home will remain. The project requires Design Review by the County of Sonoma Design Review Committee. A referral letter was sent to the appropriate local, State, and Federal agencies and interest groups who may wish to comment on the project.

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

Please contact Jennifer Faso, Project Planner at Jennifer. Faso@ Sonoma-county.org, (707)565-1683.

# II. EXISTING FACILITY

The Sebastopol Self-Storage project is located as 1382 Highway 116 South, Sebastopol, in unincorporated Sonoma County, California. (See Figure 1, *Project Location Map*.) The parcel has split zoning, with Rural Residential on the westerly portion and Limited Commercial on the easterly portion adjacent to Highway 116. The project is located within the Limited Commercial portion. The 11.34-acre project site is located on the west side of Highway 116, north and west of the intersection with Bloomfield Road. (See Figure 2, *Aerial Photograph*.) Access to the project site and the area where development is proposed occurs from an existing driveway off Highway 116. The project is located within the Limited Commercial portion.

Existing development on the 11.34-acre site includes a single-family residence of approximately 2,150 square feet, with a detached garage; an existing market, Sequoia Mart, consisting of approximately 3,600 square feet; and Sequoia Burger, a fast-food restaurant of approximately 500 square feet. On-site parking is currently provided for the residence and commercial businesses. The surrounding environment consists of Highway 116, commercial development, and open storage lots to the north and east across Highway 116, with single-family residential development and open fields farther east. The City of Sebastopol is approximately 0.25 mile to the north; outside City Limits to the northeast is primarily agricultural land and open fields. Land uses to the west and south are primarily rural residential, with agricultural land uses and open fields located further to the south and east.

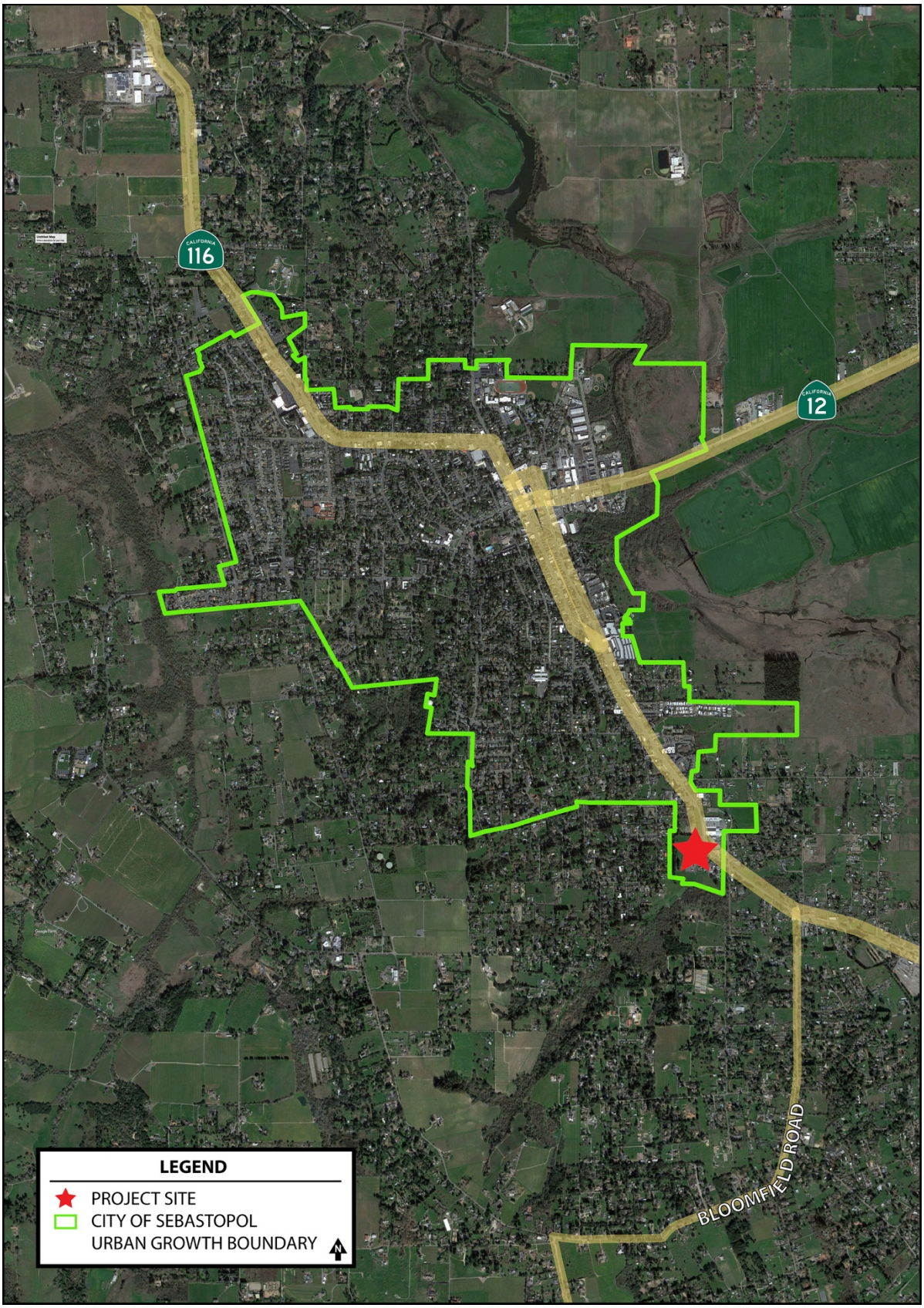


**Figure 1.** ***Project Location Map***

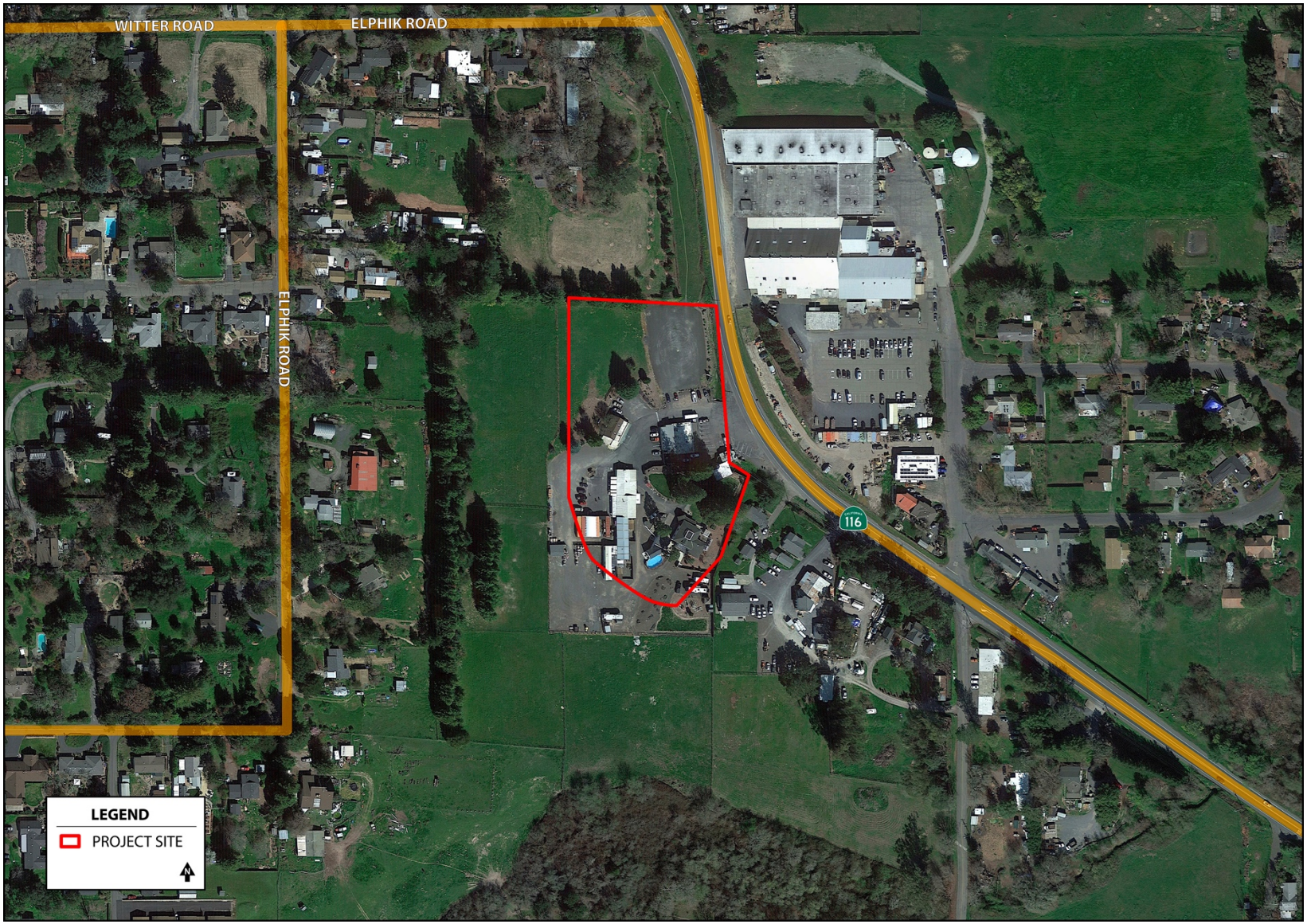


**Figure 2.** ***Aerial Photograph***

# III. PROJECT DESCRIPTION

The project is a request for Design Review Approval of a new 89,856 square-foot self-storage facility, which will provide approximately 745 storage units. Development will occur as four buildings, as shown in Figure 3, *Sebastopol Self-Storage Site Plan*.

- Building A will be single-story with an approximate height of 14 feet for the majority of the building footprint, with the exception of a lobby which will have an approximate height of 30 feet.
- Building B will be single-story with an approximate height of 16 feet.
- Building C will be single story with an approximate height of 12 feet.
- Building D will be two-stories with an approximate height of 30 feet.

Buildings A and B will be situated on the northern portion of the site in an "L"-shaped manner. Building A will encompass approximately 6,900 square feet and will include a 700-square-foot office and 1,200 square feet for wine storage. Building B will encompass 4,156 square feet and will only include storage units. Building C will be in the southern portion of the site and will encompass 2,800 square feet of storage units. Building D will be located in the central portion of the site and encompass 76,000 square feet of storage units. Storage units will range in size from five feet-by-five feet (25 square feet) to as large as 10 feet-by-20 feet (200 square feet).

As shown in the *Project Elevations* (see Figures 4a through 4f), architecturally, the project will feature a modern farmhouse style, with dark tiled pitched roofs, tan/brown siding, and dark-framed paned windows. Accents, including barn trim and gray brickwork, will highlight each building. Ground floor units will include green colored roll-up doors to facilitate access trucks unloading larger storage items. The facility will have a gated entrance, and a six-foot tall wrought-iron fence with concrete posts will surround the storage buildings to provide security and also allow views into the facility (See Figures 5a through 5d, *Project Renderings*).

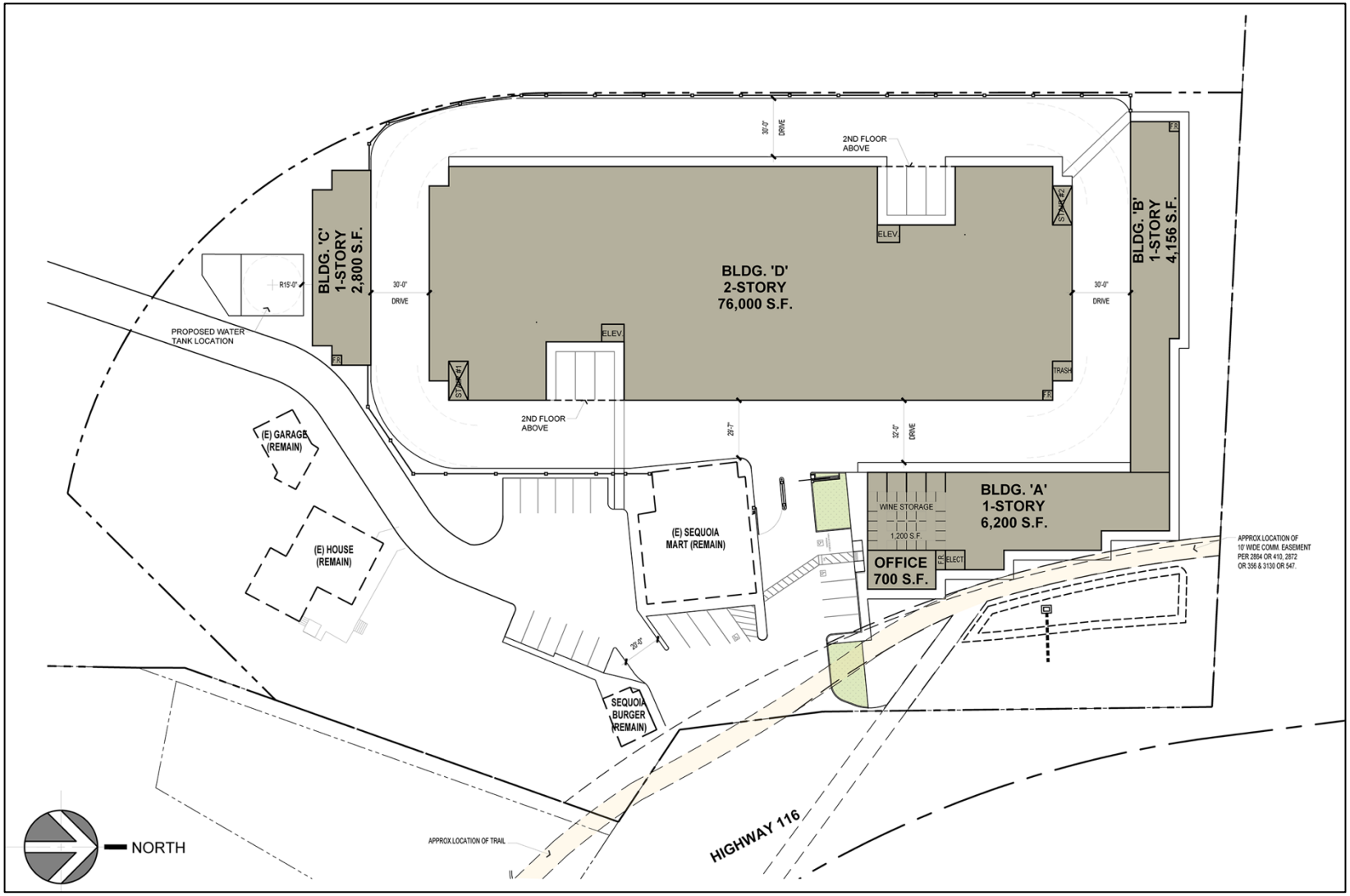


**Figure 3.** ***Sebastopol Self-Storage Site Plan.***

**Figure 4a.** ***Project Elevations***

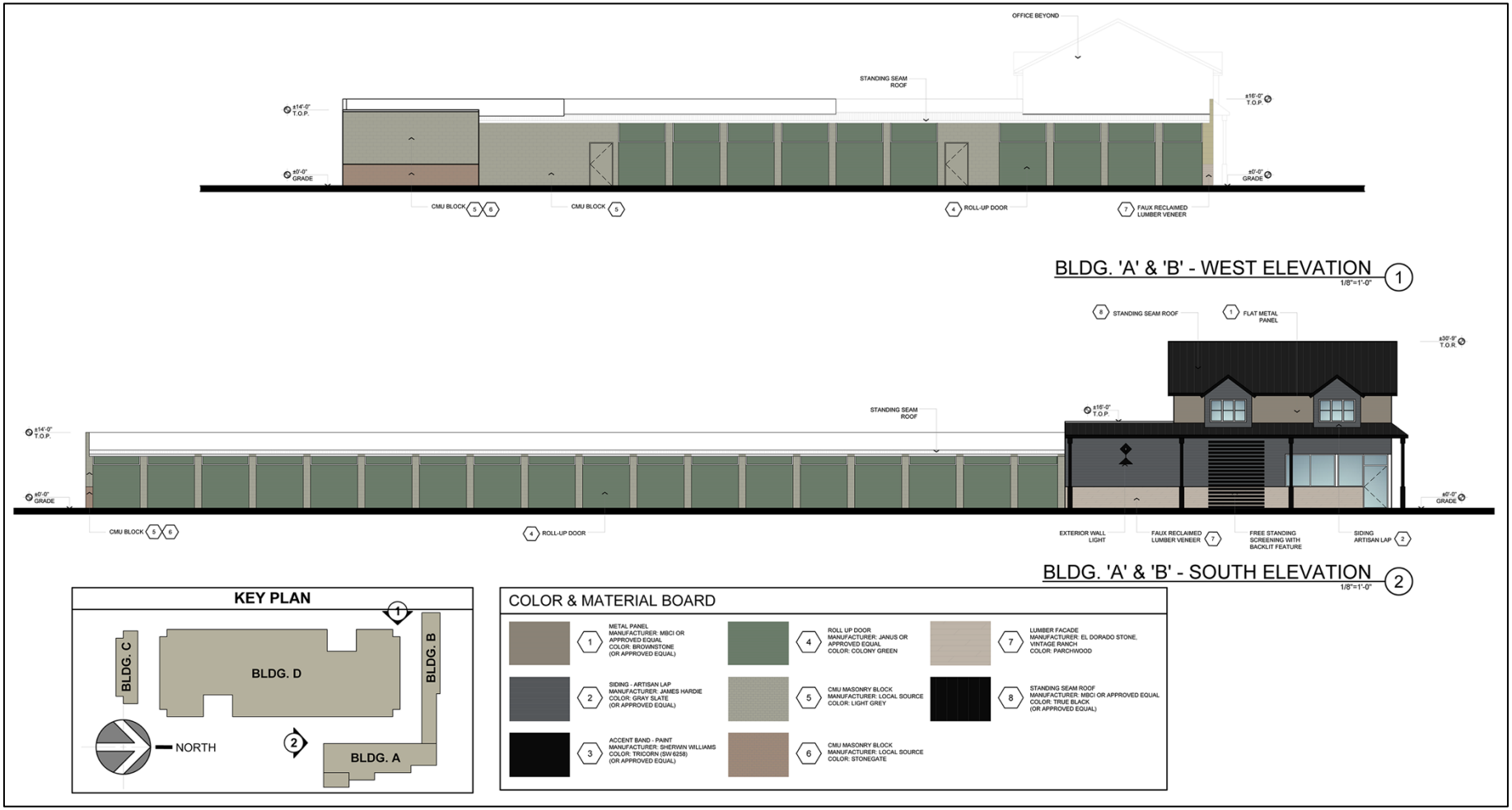


**Figure 4b.** ***Project Elevations***

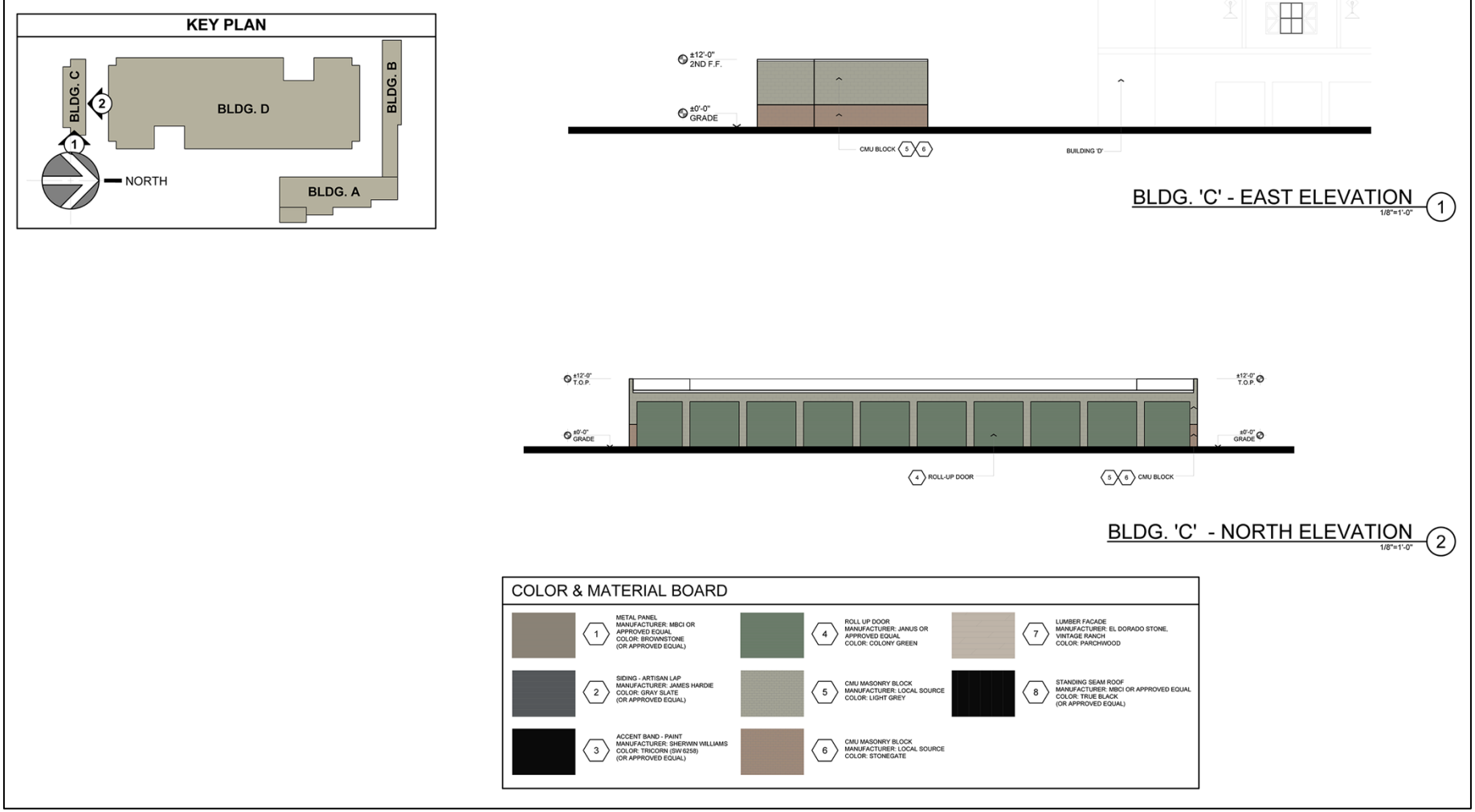


**Figure 4c.** ***Project Elevations***

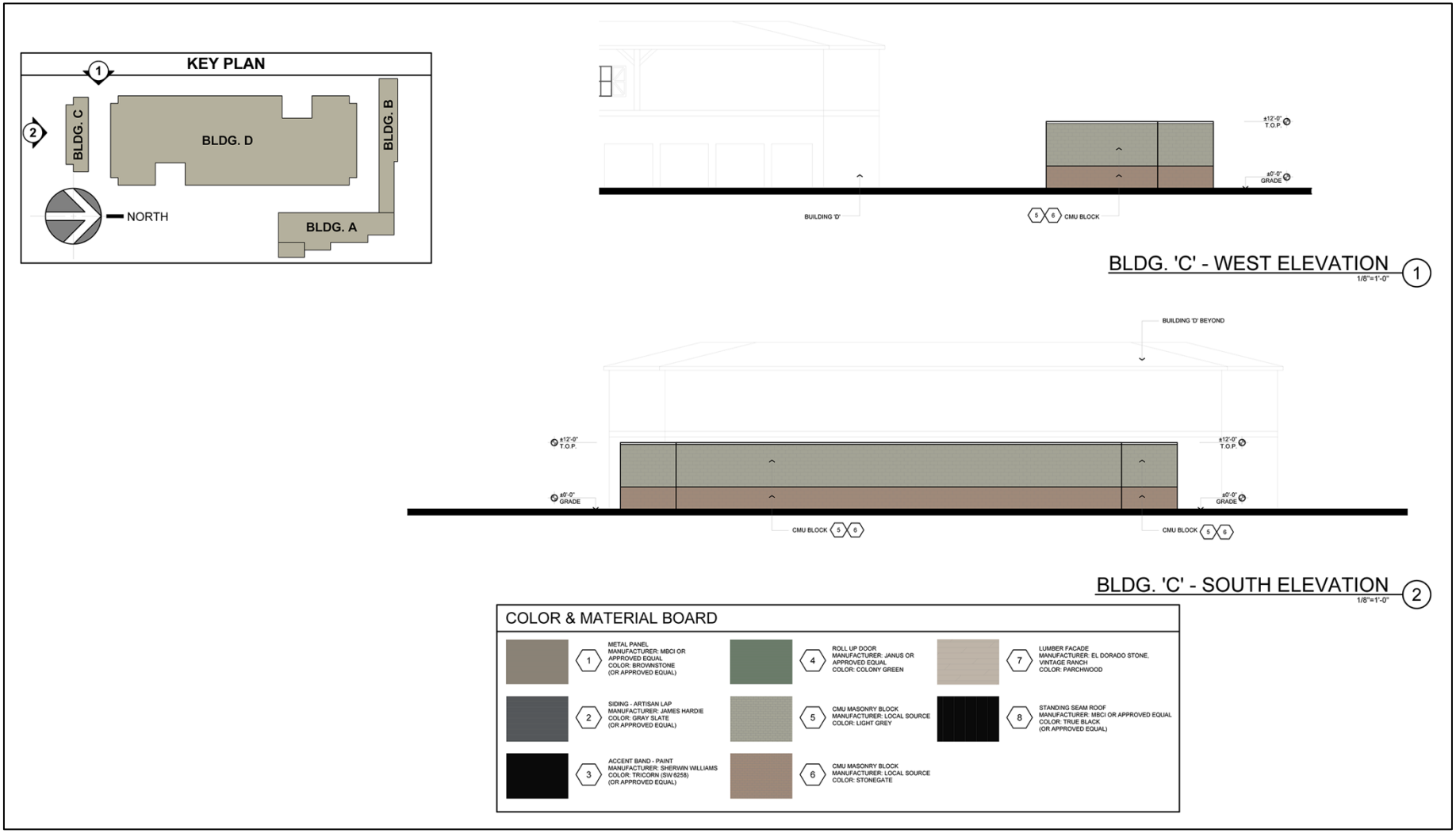


**Figure 4d.** ***Project Elevations***

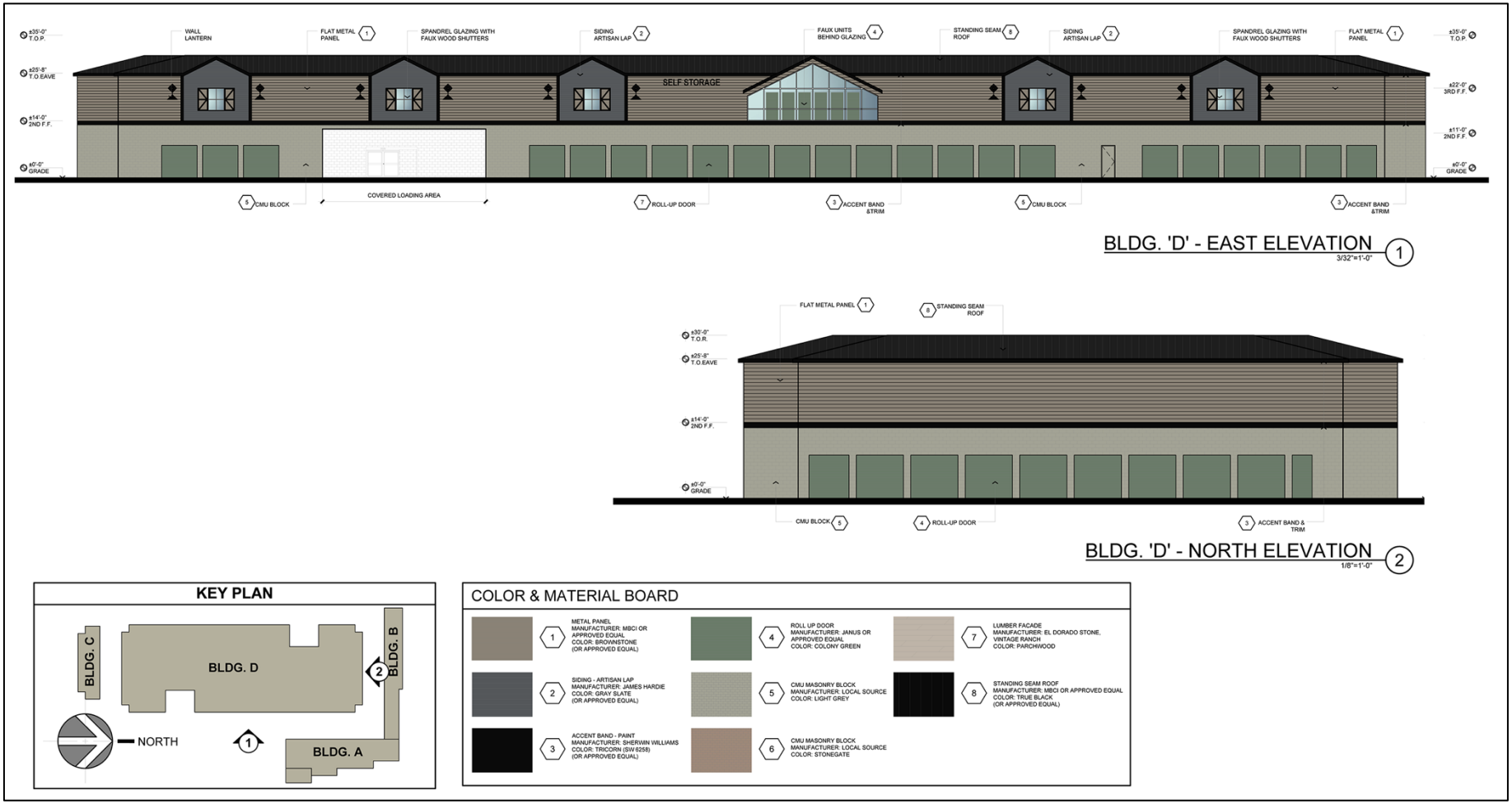


**Figure 4e.** ***Project Elevations***

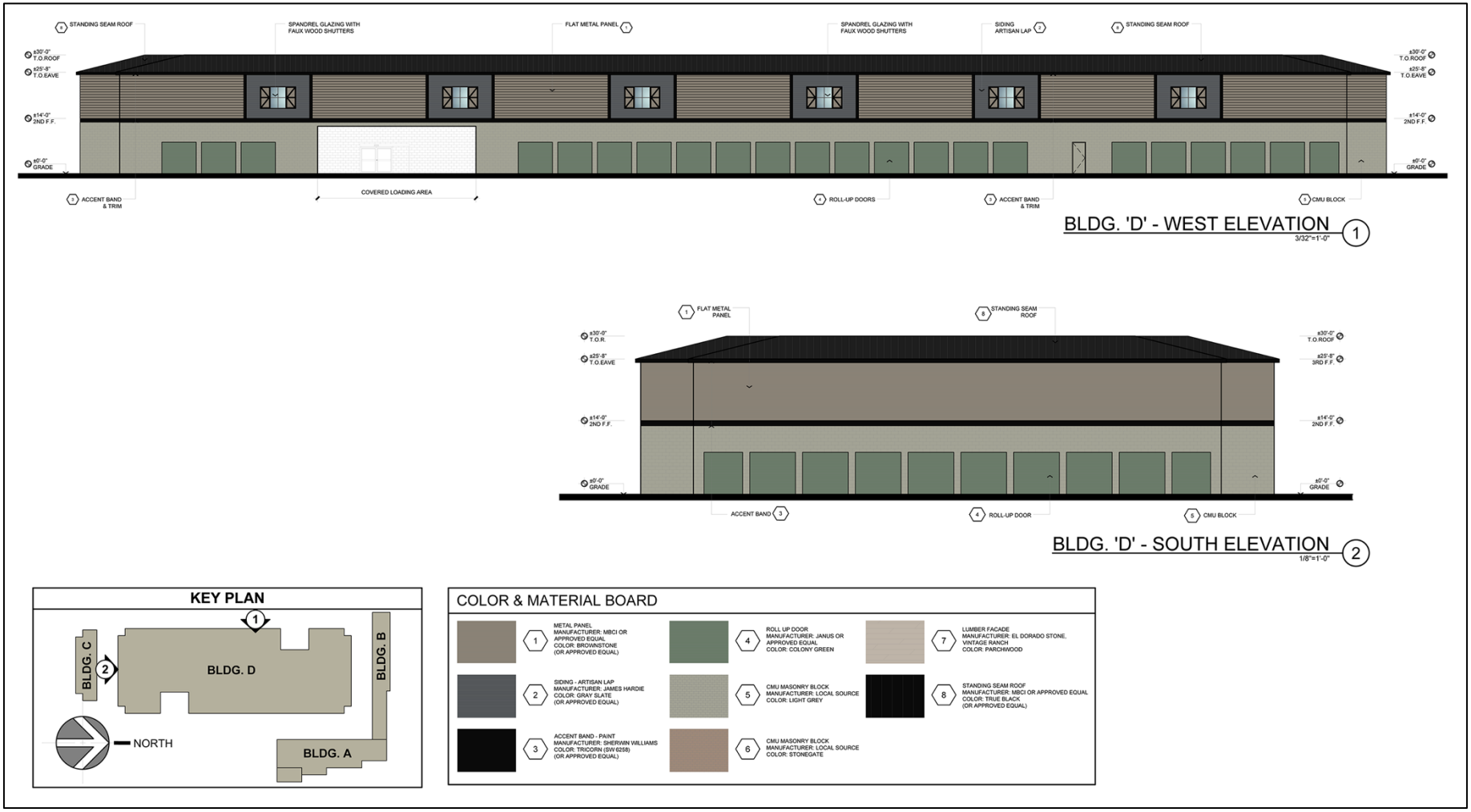


**Figure 4f.** ***Project Elevations***

**Figure 5a.** ***Project Rendering***

**Figure 5b.** ***Project Rendering***

**Figure 5c.** ***Project Rendering***

**Figure 5d.** ***Project Rendering***

***Landscaping***

Landscaping for the project is shown in Figure 6a, *Preliminary Landscape Plan.* Figure 6b, *Landscape Plan – Elevations*, depicts how the landscaped project site will look from external views.

The Preliminary Landscape Plan features a variety of trees, shrubs, groundcovers, and grasses. Shrubs, ground cover, and grasses will occur around the perimeter of the site and will include native and naturalized plant material. Trees (24-inch box size) will be closer to the buildings and will include evergreens (such as strawberry tree and sweet bay tree), as well as flowering trees (such as pacific dogwood, California redbud, and western redbud). All landscaping will be irrigated and permanently maintained.

***Access and Parking***

Access to the project will be from an extension of the existing driveway off Highway 116, circling around the Sequoia Mart to the self-storage facility office and the entrance gate allowing access to the storage buildings. A total of 27 parking spaces will be provided as surface parking around the Sequoia Mart, at the self-storage facility office, and along the western side of Building D. The project will also maintain the existing walking through the project site, paralleling Highway 116.

***Demolition, Earthwork, and Storm Water Control***

<u>Demolition</u>

Two existing commercial buildings (West County Glass Company and Discount Alley) encompassing a total of 7,960 square feet will be demolished to allow development of the self-storage facility. The single-family home, Sequoia Market, and Sequoia Burger fast-food restaurant will remain. Figure 7, *Site Layout*, provides a rendering of the project showing the location of the Sequoia Market and Sequoia Burge fast-food restaurant.

<u>Earthwork</u>

The current project site is generally flat. The project will require finish grading to accommodate the self-storage facility. Grading will involve approximately 8,695 cubic yards of cut and 1,038 cubic yards of fill. Approximately 7,657 cubic yards of earth will be exported.

<u>Storm Water Control</u>

The project will manage and treat storm water runoff. An off-site roadside drainage occurs along Highway 116, separating the development from Highway 116. Located on the project site, control of stormwater runoff will include channel mat improvements to aid in erosion and sediment control. Two bioretention basins are proposed to allow for treatment and infiltration of storm water runoff prior to entering the roadside drainage. Throughout the site, channel drains, drop inlets, and storm drains will be used to collect stormwater before depositing into bioretention basins. A vegetated cutoff swale is proposed within the landscaped area along the western project boundary, which would contain flood flows and promote sheet flow infiltration prior to flood water entering natural drainage.

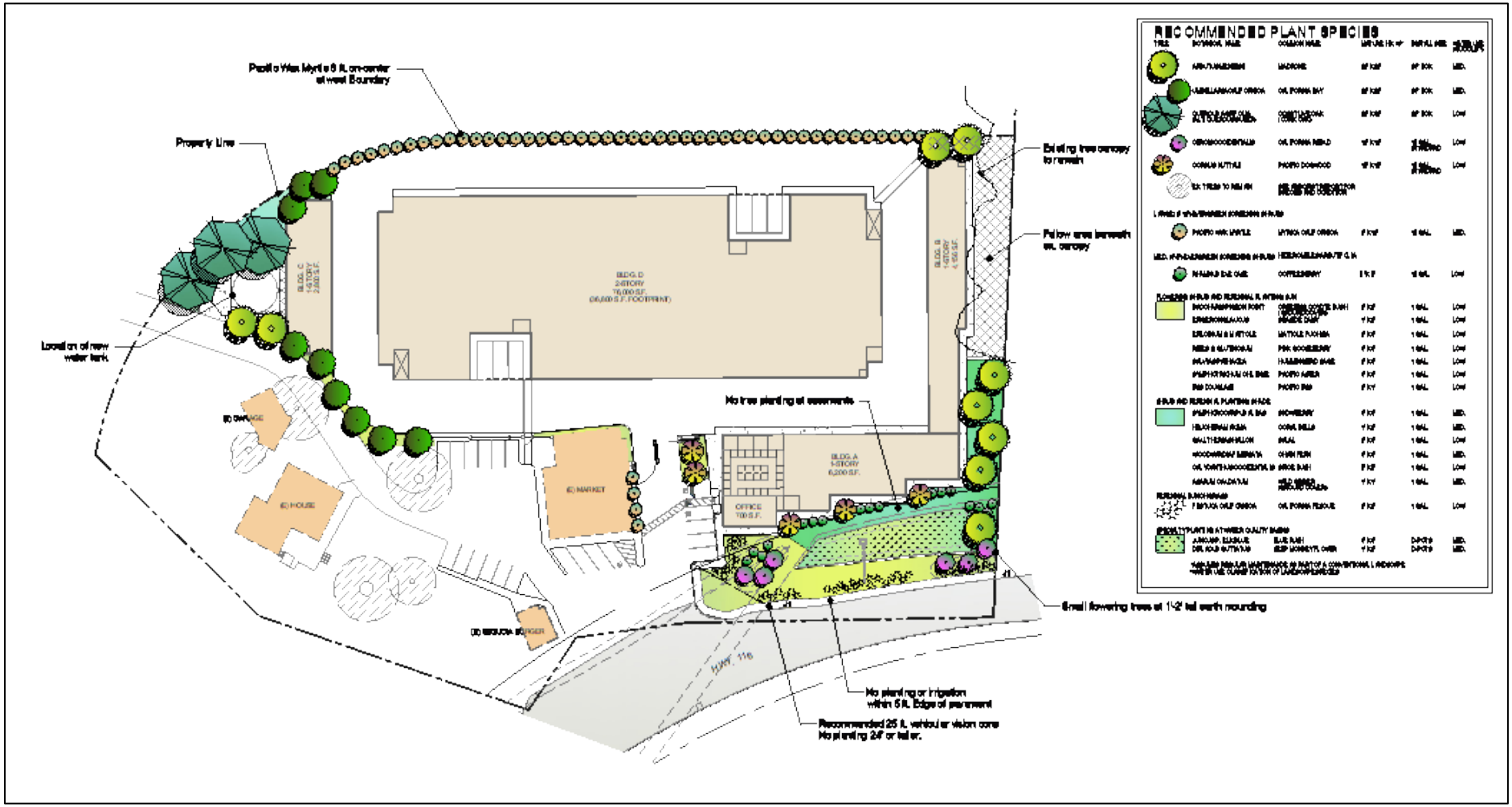


**Figure 6a.** ***Preliminary Landscape Plan***

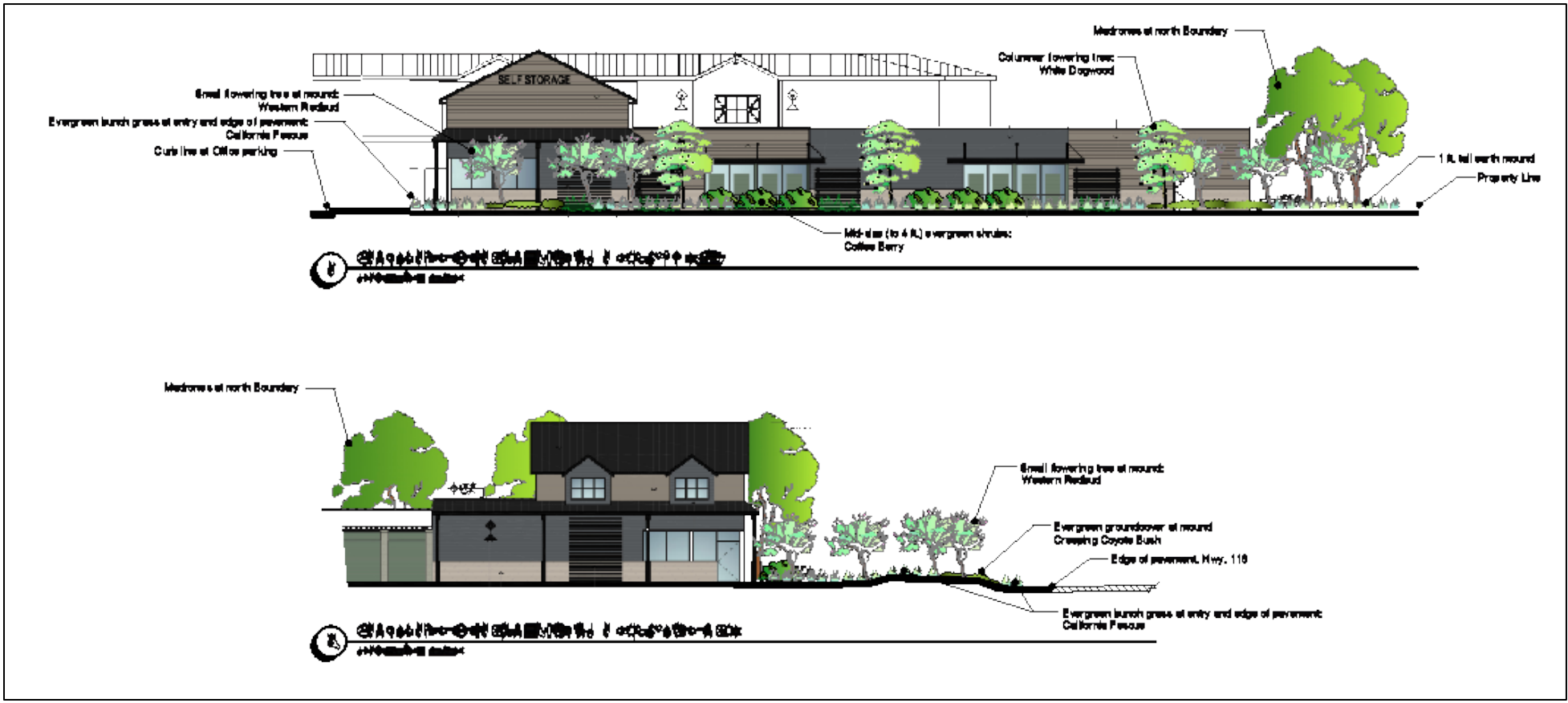


**Figure 6b.** ***Preliminary Landscape Plan - Landscape Plan – Elevations***

**Figure 7.** ***Site Layout***

# IV. SETTING

The project site is a developed site located at 1382 Highway 116 South, Sebastopol in unincorporated Sonoma County (APN 063-011-017). The site is generally flat, with existing elevations ranging from 109 feet above mean sea level in the northwest corner of the site to 105 feet above mean sea level in the eastern portion of the site. The site is situated on the west side of the Laguna de Santa Rosa (Laguna), a 22-mile-long wetland complex that drains a 254-square-mile area encompassing most of the Santa Rosa Plain in Sonoma County. There are no streams or wetlands on or adjacent to the project site. An unnamed tributary to the Laguna is located more than 400 feet to the south of the project site and flows from west to the east into the Laguna. Blucher Creek, located approximately two miles south of the site, flows from southeast to northwest into the Laguna. Land uses immediately surrounding the project site consist mainly of residential development and open space lands, with some commercial uses located along Highway 116.

## V. ISSUES RAISED BY THE PUBLIC OR AGENCIES

On June 8, 2022, Permit Sonoma circulated a referral packet to inform and solicit comments from selected relevant local, State, and Federal agencies; local Tribes; neighbors within 300 feet of the project site; and special interest groups that were anticipated to take interest in the revised project. Comments were received from:

- Caltrans
- Permit Sonoma Fire Prevention
- Permit Sonoma Grading and Stormwater Division
- Permit Sonoma Health Specialist
- Sonoma County Public Infrastructure, formally Department of Transportation and Public Works
- County of Sonoma Regional Parks

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

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

Public Comments on the proposed project have been received, which were entered into the project file. Issues raised by the public included building massing and height, scale of development, landscaping and tree preservation, lighting, drainage, noise, and water use. These issues are addressed in various issue discussion sections of Section VI, including *Aesthetics* (Section VI. 1), *Hydrology* (Section VI. 10) *Noise* (Section VI. 13), and *Utilities and Service Systems* (Section VI. 19).

# VI. EVALUATION OF ENVIRONMENTAL IMPACTS

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

> **No Impact:** The project would not have the impact described. The project may have a beneficial effect, but there is no potential for the project to create or add increment to the impact described.
>
> **Less Than Significant Impact**: The project would have the impact described, but the impact would not be significant. Mitigation is not required, although the project applicant may choose to modify the project to avoid the impacts.
>
> **Less Than Significant with Mitigation Incorporated:** The project would have the impact described, and the impact could be significant. One or more mitigation measures have been identified that will reduce the impact to a less than significant level.
>
> **Potentially Significant Impact:** The project would have the impact described, and the impact could be significant. The impact cannot be reduced to less than significant by incorporating mitigation measures. An environmental impact report must be prepared for this project.

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

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

# 1. AESTHETICS:

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

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

Comment:
The project site is located in a partially urbanized pocket of commercial and industrial development along Highway 116, approximately 0.25 mile south of the City of Sebastopol. The project site is currently developed with low-rise (single-story) structures, including a single-family residence of approximately 2,150 square feet, with a detached garage of approximately 730 square feet; an existing market, Sequoia Mart, consisting of approximately 3,600 square feet; and Sequoia Burger, a fast-food restaurant of approximately 500 square feet. A gravel parking lot provides parking for the residence and commercial businesses. The surrounding environment consists of Highway 116, commercial development, and open storage lots to the north and east across Highway 116, with single-family residential development and open fields farther east. The City of Sebastopol is approximately 0.25 mile to the north; outside City Limits to the northeast is primarily agricultural land and open fields. Land uses to the west and south are primarily rural residential, with agricultural land uses and open fields located further to the south and east.

The Sonoma County General Plan addresses scenic resources in the Open Space & Resource Conservation Element and identifies scenic resources as within three categories: Community Separators, Scenic Landscape Units, and Scenic Highway Corridors. Figure OSRC-1 of the General Plan shows the location of each of these categories. The project site is not located in an area identified as a Community Separator or a Scenic Landscape Unit. The project site is located within a Scenic Corridor (Highway 116), which is identified in the General Plan as a Scenic Highway Corridor north and south of the City of Sebastopol. The Open Space & Resource Conservation Element describes the Highway 116 Scenic Highway Corridor as follows:

> **Highway 116**
> The view corridor along Highway 116 contains unique views of orchards, redwood groves, and the Russian River. This area also defines the community boundaries of Forestville, Guerneville, and Monte Rio and their adjacent rural residential development.

Policies within the Open Space & Resource Conservation Element address the need for restrictive setbacks to preserve views along Scenic Highway Corridors, including:

> **Policy OSRC-3b:** For development on parcels located both within Scenic Landscape Units and adjacent to Scenic Corridors, apply the more restrictive siting and setback policies to preserve visual quality.

> **Policy OSRC-3c:** Establish a rural Scenic Corridor setback of 30 percent of the depth of the lot to a maximum of 200 feet from the centerline of the road unless a different setback is provided in the Land Use Policies for the Planning Areas.

Scenic Corridor setbacks do not apply to parcels located within an Urban Service Area, and therefore, do not apply to the project. However, because the site is located within a State-designated Scenic Highway and is subject to local guidelines for the Highway 116 Scenic Corridor, a visual analysis was conducted. The project site occurs along a stretch of Highway 116 that straightens in its north-west approach to Sebastopol City. Approaching the project from the south on Highway 116, the project site is largely obscured by mature redwood trees. The proposed development would not come into view until the highway straightens in its north-west approach south of Sebastopol city limits. As approached from the south, and paralleling the site while passing by, the proposed project would not block any scenic vistas, as the existing structures currently occupy the bulk of the view with existing mature redwood trees forming the western boundary of the project and framing views before giving way to open sky. Approaching the project from the north on Highway 116, the view is similar, with existing single-story structures surrounded by mature trees. Neither approaches lend themselves to a scenic vista, as the site is already developed with several structures.

Policies OSRC-3b and OSRC-3c of the Sonoma General Plan require parcels located adjacent to Scenic Corridors to apply a restrictive setback to preserve visual quality. The proposed project is in compliance with the Sonoma County Scenic Corridor required building setbacks of 30 percent of the depth of the lot.

The proposed project design is consistent with the local guidelines for Highway 116 and the design review development standards of the Sonoma County zoning code. The project has been designed to architecturally fit in with the rural character of the surrounding area while being similar in scale to the existing structures and natural environment.

Significance Level:
Less than Significant Impact

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

Comment:
The proposed project is located along Highway 116, designated as a State Scenic Highway from Route 1 on the coast to the southern Sebastopol city limits. As discussed below, the project site includes mature trees; there are no rock outcroppings on the project site. On-site structures have been evaluated relative to historic importance and have been determined to not be

historically significant. The project would not damage scenic resources along the portion of Highway 116 that forms project frontage.

Nine trees would be removed as a part of the project. These trees do not contribute to a scenic view and occupy a space in a north western portion of the project area, along the edge of the existing gravel parking lot, and away from the masses of trees along Highway 116 and along the property's western boundary.

As evaluated under Item 5, *Cultural Resources*, the only structure on-site old enough to require historic consideration, a barn, has been modified over the last several decades, obscuring its original shape, and has undergone extensive interior remodeling during that time such that the interior and exterior no longer convey significance. The structure has been deemed ineligible for the California Registry, because its historic integrity has been compromised. Thus, the project would not affect historic buildings.

Significance Level:
Less Than Significant Impact

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

Comment:
See item 1 (a), above.

Significance Level:
Less Than Significant Impact

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

Comment:
The project will replace existing structures with four new buildings housing internal storage units. New sources of light would include security and safety lighting. Thus, the proposed project would introduce new sources of light and glare.

The Sonoma County General Plan Open Space & Resource Conservation Element includes the following goal, objectives, and policies with regard to outdoor lighting:

**GOAL OSRC-4:** Preserve and maintain views of the night time skies visual character of urban, rural and natural areas, while allowing for nighttime lighting levels appropriate to the use and location.

**Objective OSRC-4.1:** Maintain night time lighting levels at the minimum necessary to provide for security and safety of the use and users to preserve night time skies and the night time character of urban, rural and natural areas.

**Objective OSRC-4.2:** Ensure that night time lighting levels for new development are designed to minimize light spillage offsite or upward into the sky.

**Policy OSRC-4a:** Require that all new development projects, County projects, and signage utilize light fixtures that shield the light source so that light is cast downward and that are no more than the minimum height and power necessary to adequately light the proposed use.

**Policy OSRC-4b:** Prohibit continuous all night exterior lighting in rural areas, unless it is demonstrated to the decision making body that such lighting is necessary for security or operational purposes or that it is necessary for agricultural production or processing on a seasonal basis. Where lighting is necessary for the above purposes, minimize glare onto adjacent properties and into the night sky.

**Policy OSRC-4c:** Discourage light levels that are in excess of industry and State standards.

The project would be consistent with the General Plan and would not result in the creation of substantial light or glare that would adversely affect day or nighttime view in the area. Under Article 82 of the Zoning Code, the County's standard development regulations call for minimizing the impact of new development by ensuring exterior lighting is designed to prevent glare and preclude light spillage onto neighboring properties and into the night sky. The following standard condition of approval would be incorporated into the project:

*Prior to issuance of the Building Permit, an exterior lighting plan shall be submitted to the Design Review Committee for review and approval. Exterior lighting is required to be fully shielded and directed downward to prevent "wash out" onto adjacent properties. Generally, fixtures should accept sodium vapor lamps and not be located at the periphery of the property. Flood lights are not allowed. The lighting shall be installed in accordance with the approved lighting plan during the construction phase.*

Lighting for the proposed project would comply with the California Building Code and County regulations. Wall lights would be placed along the north and south perimeter of the property, as well as the property interior to illuminate aisleways, rated at 5,062 lumens. Additionally, a standard condition of approval requires:

*All new exterior lighting to be dark sky compliant, low mounted, downward casting and fully shielded to prevent glare. Lighting shall not wash out structures or any portions of the site. Light fixtures shall not be located at the periphery of the property and shall not spill over onto adjacent properties or into the night sky. Flood lights are not permitted. Lighting shall shut of automatically after closing and security lighting shall be motion sensor activated. Prior to final occupancy of the cave portal, the applicant is required to demonstrate compliance with exterior lighting requirements by providing Permit and Resource Management Department (PRMD) photograph documentation of all exterior light fixtures installed.*

By incorporating standard conditions of approval, the project will not result in a new source of substantial light or glare with would adversely affect day or nighttime view in the area.

Significance Level:
Less Than Significant Impact

## 2. AGRICULTURE AND FOREST RESOURCES:

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

**Would the project:**

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

Comment:
The project site is located on land classified as Urban and Built-Up Land on the Sonoma County Important Farmland Map. The project site is not located within any of the areas identified in the California Department of Conservation Farmland Mapping and Monitoring Program Farmland of Local Importance list for Sonoma County.

Significance Level:
No Impact

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

The proposed project does not occupy a parcel with agricultural zoning and is not subject to a Williamson Act Contract. The proposed project area is zoned Limited Commercial and Rural Residential.

Significance Level:
No Impact

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

Comment:
The project site is not under the TP (Timberland Production) zoning district. The proposed project area is zoned Limited Commercial and Rural Residential.

Significance Level:
No Impact

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

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

Significance Level:
No Impact

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

Comment:
The proposed project includes the replacement of existing Limited Commercial uses and construction of a self-storage facility. The project site is comprised of commercial buildings and compacted gravel parking areas. No agricultural or forest exists on the site.

Significance Level:
No Impact

# 3. AIR QUALITY:

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

An air quality analysis has been prepared for the project (Updated Sequoia Mini Storage Development Air Quality and Greenhouse Gas Emissions Assessment, Illingworth & Rodkin, Inc., May 5, 2022) and is included as Appendix A. The air quality analysis evaluates the project utilizing the California Emissions Estimator Model (CalEEMod) to determine the potential impacts to air quality during the construction and the post-construction operational period.
**Would the project:**

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

Comment:
The project is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD) which is currently designated as a nonattainment area for state and federal ozone standards, the state PM 10 standard, and the state and federal PM 2.5 standard. The district has adopted an Ozone Attainment Plan and a Clean Air Plan in compliance with Federal and State Clean Air Acts. These plans include measures to achieve compliance with both ozone standards. The plans deal primarily with emissions of ozone precursors (nitrogen oxides (NOx) and volatile organic compounds, also referred to as Reactive Organic Gases (ROG)).

In addition to State and Federal standards, the project is within Sonoma County and is subject to the policies within the Sonoma County General Plan. The Sonoma County General Plan Open Space & Resource Conservation Element is focused on maintaining good air quality and providing for an air quality standard that will protect human health and preclude crop, plant, and property damage, minimizing air pollution and greenhouse gas emissions.

The project would not conflict with the BAAQMD's air quality plans or the Sonoma County General Plan. As presented under item number 3 (b) below, the project would not result in significant air quality Impacts. When focusing specifically on the BAAQMD thresholds for ROG, $NO_X$, $PM_{10}$, and $PM_{2.5}$, the building and operational phases of the project would result in a fraction of those levels required to qualify as significant.

Significance Level:
Less than Significant Impact

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

Comment:
The below analysis is summarized from the Air Quality Assessment, which is provided in full as Appendix A. The BAAQMD CEQA Significance Thresholds establish a level that BAAQMD believes air pollution emissions would cause significant environmental impacts under CEQA. The BAAQMD CEQA Significance Thresholds are presented in Table 4, *BAAQMD Significance Thresholds* (Average Daily Emissions bolded for emphasis).

**Table 4. BAAQMD CEQA Significance Thresholds**

| Criteria Air Pollutant | Construction Thresholds | Operational Thresholds | |
|---|---|---|---|
| | **Average Daily Emissions (lbs./day)** | **Average Daily Emissions (lbs./day)** | **Annual Average Emissions (tons/year)** |
| ROG | 54 | 54 | 10 |
| $NO_X$ | 54 | 54 | 10 |
| $PM_{10}$ | 82 (Exhaust) | 82 | 15 |
| $PM_{2.5}$ | 54 (Exhaust) | 54 | 10 |
| CO | Not Applicable | 9.0 ppm (8-hour average) or 20.0 ppm (1-hour average) | |
| Fugitive Dust | Construction Dust Ordinance or other Best Management Practices | Not Applicable | |

Note: ROG = reactive organic gases, NOx = nitrogen oxides, $PM_{10}$ = course particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, $PM_{2.5}$ = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less. GHG = greenhouse gases.

***Construction Activities***

Construction activities are primarily made up of on-site construction equipment emissions and off-site activity produced by worker trips, hauling, and vendor traffic. Table 5, *Construction Period Emissions*, shows average daily construction emissions of ROG, NOx, $PM_{10}$ exhaust, and $PM_{2.5}$ exhaust during construction of the project. As indicated in Table 5, predicted construction period emissions would not exceed the BAAQMD significance thresholds.

**Table 5. Construction Period Emissions**

| Scenario | ROG | NOx | PM10 Exhaust | PM2.5 Exhaust |
|---|---|---|---|---|
| Annual Total Construction Emissions (tons) | 0.79 | 2.33 | 0.10 | 0.10 |
| **Average Daily Emissions (pounds/day)[1]** | 5.2 | 15.5 | 0.7 | 0.7 |
| *BAAQMD Thresholds (pounds per day)* | *54* lbs./day | *54* lbs./day | *82* lbs./day | *54* lbs./day |
| **Exceed Threshold?** | *No* | *No* | *No* | *No* |

[1]Assumes 300 workdays.

Construction would not generate emissions meeting or exceeding a significance threshold in respect to ROG, $NO_X$, $PM_{10}$, or $PM_{2.5}$. Beyond the BAAQMD emission types of concern, construction, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of $PM_{10}$ and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less than significant, if best management practices are implemented to reduce these emissions. *Mitigation Measure AQ-1* would implement BAAQMD-recommended best management practices.

***Operational Emissions***

Once the project is constructed, operational air emissions from the project would be generated primarily from vehicles driven by future self-storage tenants. Evaporative emissions from architectural coatings and maintenance products are typical emissions for these types of uses. Table 6, *Operational Period Emissions*, shows average daily emissions of ROG, NOx, total $PM_{10}$, and total $PM_{2.5}$ during operation of the project. Project operation would generate only small amounts of air pollutants and would not significantly impact any of the BAAQMD thresholds of concern.

**Table 6. Operational Period Emissions**

| Scenario | ROG | NOx | PM10 | PM2.5 |
|---|---|---|---|---|
| 2024 Project Operational Emissions (*tons/year*) | 0.53 tons | 0.14 tons | 0.16 tons | 0.05 tons |
| *BAAQMD Thresholds (tons /year)* | *10 tons* | *10 tons* | *15 tons* | *10 tons* |
| ***Exceed Threshold?*** | *No* | *No* | *No* | *No* |
| 2024 Project Operational Emissions (*pounds/day*)[1] | **2.9** lbs. | **0.8** lbs. | **0.9** lbs. | **0.3** lbs. |
| *BAAQMD Thresholds (pounds/day)* | *54* lbs. | *54* lbs. | *82* lbs. | *54* lbs. |
| ***Exceed Threshold?*** | *No* | *No* | *No* | *No* |

[1] Assumes 365-day operation.

Significance Level:
Less than Significant with Mitigation Incorporated

Mitigation:

**Mitigation Measure AIR-1:** The following dust and air quality control measures shall be included in the project:

1) Construction Coordinator shall be designated by the project applicant, and a sign shall be posted on the site including the Coordinator's 24-hour phone number for public contact regarding dust, trackout, and air quality complaints. The Coordinator shall

respond and take corrective action within 48 hours. The Coordinator shall report all complaints and their resolutions to Permit Sonoma staff.

2) Water or alternative dust control method shall be sprayed to control dust on construction areas, soil stockpiles, and staging areas during construction as directed by the County.

3) Trucks hauling soil, sand, and other loose materials over public roads shall cover the loads, or shall keep the loads at least two feet below the level of the sides of the container, or shall wet the load sufficiently to prevent dust emissions.

4) Vehicle speeds on unpaved areas shall be limited to 15 miles per hour.

5) Final surfacing (i.e., pavement or concrete, gravel, landscaping) shall be completed as soon as possible after earthwork is finished, unless seeding or soil binders are used.

6) Idling time of diesel-powered construction equipment shall be limited to five minutes. Signs shall be posted reminding workers of this idling restriction at all access points and equipment staging areas during construction of the proposed project.

7) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications and shall have a CARBcertified visible emissions evaluator check equipment prior to use at the site.

8) Trackout shall not be allowed at any active exit from the project site onto an adjacent paved public roadway or shoulder of a paved public roadway that exceeds cumulative 25 linear feet and creates fugitive dust visible emissions without cleaning up such trackout within 4 hours of when the Construction Coordinator identifies such excessive trackout, and shall not allow more than 1 quart of trackout to remain on the adjacent paved public roadway or the paved shoulder of the paved public roadway at the end of any workday.

9) Visible emissions of fugitive dust shall not be allowed during cleanup of any trackout that exceeds 20 percent opacity as determined by the Environmental Protection Agency in Method 203B - Opacity Determination for Time Exception Regulations (August 2017).

10) Trackout is defined by BAAQMD in Regulation 6, Rule 6: Prohibition of Trackout (August 2018) as any sand, soil, dirt, bulk materials or other solid particles from a site that adhere to or agglomerate on the exterior surfaces of vehicles (including tires), and subsequently fall or are dislodged onto a paved public roadway or the paved shoulder of a paved public roadway on the path that vehicles follow at any exit and extending 50

feet out onto the paved public roadway beyond the boundary of the site. Material that has collected on the roadway from erosion is not trackout.

**Mitigation Monitoring AIR-1:** Permit Sonoma staff shall verify that the AIR-1 measures are included on all site alteration, grading, building or improvement plans prior to issuance of grading or building permits. The applicant shall submit documentation to Permit Sonoma staff that a Construction Coordinator has been designated and that appropriate signage has been posted including the coordinator's phone number. Documentation may include photographic evidence or a site inspection, at the discretion of Permit Sonoma staff.

**c) Expose sensitive receptors to substantial pollutant concentrations?**

Comment:
Certain groups of people are more affected by air pollution than others. California Air Resources Board (CARB) has identified the following persons – classified as "sensitive receptors" – who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools.

Relative to the proposed project, nearby sensitive receptors include the residents in the one on-site single-family home, in the single-family homes located 53 feet to the southeast of the project, and in the single-family homes located 441 feet and 203 feet to the west and north, respectively, of the project site. The project would not introduce new sensitive receptors to the area.

A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure or acute and/or chronic noncancer health effects. A toxic substance released into the air is considered a toxic air contaminant by CARB and as a hazardous air pollutant by the Environmental Protection Agency (EPA). Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. Toxic air contaminants (TACs) are generated by a number of sources, including stationary sources, such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources, such as automobiles or diesel emissions from trucks; and area sources, such as landfills. Adverse health effects associated with exposure to toxic air contaminants may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced either on short-term (acute) or long-term (chronic) exposure to a given toxic air contaminants. TACs do not have ambient air quality standards, but are regulated by the BAAQMD using a risk-based approach.

According to the air quality analysis prepared for the project, the project's estimated average daily exhaust emissions of $PM_{2.5}$, which is considered a surrogate for diesel PM, could reach to

0.7 pound per day during construction – which is substantially below the 54 pounds per day threshold recommended by BAAQMD. Considering the highly dispersive properties of diesel PM, the low mass of diesel PM emissions that would be generated during project construction, and the relatively short period during which PM-emitting construction activity would take place, construction-related TACs would not expose sensitive receptors to an incremental increase in cancer risk that exceeds 10 in one million or a hazard index of 1.0 or greater. As a result, this impact would be less than significant.

Although there will be no long term increase in emissions, there would be short-term dust emissions that could affect nearby residents. Construction-related dust emissions would be reduced to less than significant with implementation of **Mitigation Measure AIR-1** described in item number 3 (b), above.

Significance Level:
Less than Significant with Mitigation Incorporated

Mitigation:
See **Mitigation Measure AIR-1** and **Mitigation Monitoring AIR-1**, above.

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

Comment:
BAAQMD's CEQA Air Quality Guidelines (2017) identify land uses associated with odor complaints to include, but are not limited to, wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants. Construction equipment may generate odors during project construction. The impact would be less than significant as it would be a short-term impact that ceases upon completion of the project.

The proposed project would construct a self-storage commercial use. As such, no other emissions, such as odors, would be generated by the use.

Significance Level:
No Impact

# 4. BIOLOGICAL RESOURCES:

A Habitat Assessment was prepared by Wildlife Research Associates and Jane Valerius Environmental Consulting (Updated: February 29, 2024) for the project and is included as Appendix B. Additionally, an Arborist Report, consisting of a Tree Survey for the project site, was prepared by Merlin Arborist Group (March 1, 2024) to satisfy tree protection requirements applicable to the project and is included as Appendix C.

**Would the project:**

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

Comment:
The development site is an irregular-shaped area encompassing a 4.03-acre commercially developed portion of a 11.34-acre parcel. Two vegetation communities surround the project site: non-native grassland, and landscape vegetation. The proposed project area is devoid of native vegetation as it is fully disturbed and comprised of packed gravel and dirt with a small portion of lawn and a few mature redwoods northeast of the residence. The remainder of the surrounding area is non-native grassland.

**Special Status Biological Resources**
Certain vegetation communities and plant and animal species are designated as having special status based on their overall rarity, endangerment, restricted distribution, and/or unique habitat requirements. In general, special status is a combination of these factors that leads to the designation of a species as sensitive. The Federal Endangered Species Act (FESA) of 1973 outlines the procedures whereby species are listed as endangered or threatened. Additionally, FESA provides a means to conserve the ecosystems upon which listed species depend, to develop a program for the conservation of listed species, and to achieve the purposes of certain treaties and conventions. Moreover, FESA states that it is the policy of Congress that the Federal Government will seek to conserve threatened and endangered species, and use its authorities in furtherance of the purposes of FESA. The California Endangered Species Act (CESA) amends the California Fish and Wildlife Code to protect species deemed to be locally endangered and essentially expands the number of species protected under FESA.

Special Status Vegetation Communities
Sensitive natural communities are those that are considered rare in the region, may support special status plant or wildlife species, or may receive regulatory protection (i.e., through Section 404 of the CWA and/or Sections 1600 et seq. of the California Fish and Wildlife Code). In addition, sensitive natural communities include plant communities that have been identified as having highest inventory priority in the California Natural Diversity Database (CNDDB). Four special status vegetation communities have been reported in the CNDDB for the four topographic quadrangles, Sebastopol, Santa Rosa, Two Rock and Cotati (CNDDB 2022). These are coastal and valley freshwater marsh, northern hardpan vernal pool, northern vernal pool and valley needlegrass grassland.

No special status vegetation communities occur on the site.

Special Status Plant Species

Special status plant species are those species that are legally protected under FESA and/or CESA as listed or proposed for listing as threatened or endangered, as well as species that are considered rare by the scientific community. A total of 60 special status plant species have been reported occurring on the four topographic quadrangles surrounding the project site (CNDDB 2022) See Appendix B of the Habitat Assessment (Study is attached as Appendix B to this CEQA document) for a list of the species evaluated.

The majority of special status plant species are not expected to occur within the project site or the larger parcel due to lack of habitat. The site does not have any serpentine, rhyolitic, or alkaline soils and there are no coastal scrub, coastal prairie, cismontane woodland, closed-cone coniferous forest, North Coast coniferous forest, lower montane coniferous forest, chaparral, riparian scrub, bogs and fens, vernal pools, meadows and seeps, or marshes and swamps within the proposed development area. In addition, the project study area is not within the elevational range of many of the species listed in Appendix B of the Habitat Assessment. No special status plants are likely to occur due to lack of habitat and the type of maintenance that is provided to the grassland areas surrounding the project site. The grassland area is mowed and sprayed with herbicides to manage weeds. No special status plants were observed during the site visits and none are expected to occur.

Special Status Animal Species

Special status animal species include those listed by the United States Fish and Wildlife Services (USFWS) (2022) and the California Department of Fish and Wildlife (CDFW) (2022). The USFWS officially lists species as either Threatened or Endangered, and as candidates for listing. Of the 23 special status animal species identified as potentially occurring in the vicinity of the project area, including within a three mile radius of the project site (CNDDB 2022), several additional species were evaluated for their potential to occur within the study area, based on: (1) review of the Information for Planning and Conservation (IPaC) for the study area (USFWS 2022), (2) the "Special Animals" list (CDFW 2022) that includes those wildlife species whose breeding populations are in serious decline, and (3) the habitat present on-site. For those species with no suitable potential habitat on the site (i.e. fish), no further analysis was conducted. See Appendix C of the Habitat Assessment for a list of the 38 species evaluated (Study is attached as Appendix B to this CEQA document).

Of these, various nesting bird and roosting bat species have a high potential for occurrence in trees and the old barn at the project site and are discussed below. No habitat is present, and no impacts are anticipated for terrestrial animal species.

**Nesting Passerines**
Nesting passerines, including California towhee, spotted towhee, and song sparrow, among others, are protected under the USFWS Migratory Bird Treaty Act and CDFW Code 3503. As early as February, passerines begin courtship and once paired, they begin nest building, often around the beginning of March. Nest structures vary in shapes, sizes, and composition and can include stick nests, mud nests, matted reeds, and cavity nests. Depending on environmental conditions, young birds may fledge from the nest as early as May and, if the prey base is large, the adults may lay a second clutch of eggs.

No surveys were conducted for these species as part of this habitat assessment. Several passerine (perching birds) species may nest around the site in the various habitats, including, but not limited to, western meadowlark in the grasslands and white-breasted nuthatch in the trees (potentially on-site).

Passerines potentially nesting in the trees within the project area could be impacted if construction occurs during the nesting season (March through August). Implementation of *Mitigation Measure BIO-1* would reduce potential impacts on nesting passerines to a less than significant level by requiring grading and tree removal to occur outside the nesting season. If that is infeasible, then a pre-construction nesting bird survey shall be conducted before removal of any of these habitats and seasonal restrictions put into place for occupied habitats. A disturbance free buffer zone shall be established, if any active bird nests are found.

**Nesting Raptors**
Nesting raptors such as the white-tailed kite, red-shouldered hawk, American kestrel, and Cooper's hawk are covered under the Migratory Bird Treaty Act. Raptors nest in a variety of substrates including, cavities, ledges, and stick nests. Nests occur in heavily forested areas near a water source. Most raptors build stick nests, except for American kestrels that nest in cavities. In general, the breeding season for raptors occurs in late March through June, depending on the climate, with young fledging by early August. No surveys were conducted for these species as part of the habitat assessment. No evidence of past or present stick nests were observed in the landscape redwood trees on-site. Foraging habitat for raptors, such as red-shouldered hawk, among others, occurs around the project area.

Construction of the project would impact raptors that could be potentially nest in trees in the project area. Implementation of *Mitigation Measure BIO-1* would reduce impacts to raptors to a less than significant level by conducting grading and removal of trees outside of nesting season. If that is infeasible, then a pre-construction nesting bird survey shall be performed. A disturbance free buffer zone shall be established, if any active bird nests are found.

**Roosting Bats**
Roosting bats including Townsend's big-eared bat, pallid bat, western red bat, and hoary bat are CDFW Species of Special Concern (SSC). Within California, 25 bats species occur, of which 11 are

classified as SSC (CDFW 2019). One SSC bat species that often roosts in structures or suitable trees in those areas where they occur is the pallid bat. Removal of occupied roosts without prior humane eviction or other actions approved by the CDFW would result in "take," defined under CESA as "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill." In addition to the SSC bat species above, non-SSC species are also afforded consideration under CEQA, primarily when significant local breeding populations may be impacted. This includes two more common and widely-distributed bat species, Yuma myotis and Brazilian free-tailed bat, which can form very large colonies, often in features such as those found in buildings.

Bats in this region of California are not active year-round and their activity periods can be split into two distinct seasons: the maternity season and the winter season. During the maternity season, non-volant young (those not capable of flight) of colonial bats remain in the roost until late summer (end of August), after which they may disperse from the natal roost or remain into or throughout the winter. During the winter season, bats typically enter torpor, rousing only occasionally to drink water or opportunistically feed on insects. The onset of torpor is dependent upon environmental conditions, primarily temperature and rainfall.

The trees north of the project area may provide marginally suitable habitat for roosting red bat and hoary bat. There are areas nearby that provide more suitable habitat, such as along the western tree line of the parcel outside the project area, and the unnamed tributary to the Laguna. However, there would be a potential for impacts if trees are removed during the maternity season.

Pallid bats and Yuma myotis bats have potential to roost in the barn-like structure located on the project site. Based on the type and the age of the structure, there is potential for bats to use the structure for roosting.

Removal of trees associated with construction of the project may cause direct mortality of roosting bats, if the trees provide suitable roosting habitat and are removed during seasonal periods of inactivity (maternity season or winter). Implementation of *Mitigation Measure BIO-2* would reduce potential impacts on roosting bats to a less than significant level by requiring that trees be removed during the period of seasonal activity using a two-step method, which provides an opportunity for bats to abandon the roost tree prior to cutting it down. This method is conducted over two consecutive days, and works by creating noise and vibration by cutting non-habitat branches and limbs from habitat trees using chainsaws only (no excavators or other heavy machinery) on Day 1. The noise and vibration disturbance, together with the visible alteration of the tree, is very effective in causing bats that emerge nightly to feed, to not return to the roost that night. The remainder of the tree is removed the following day - Day 2. This will create a suitable disturbance and change in habitat conditions to make the trees unsuitable for roosting bats when the removal is occurring.

Renovation, removal, and demolition of buildings during project construction may cause direct mortality of roosting bats that use the structures, if the structures are removed during seasonal periods of inactivity (maternity season or winter), or without first conducting humane bat evictions or partial dismantling under supervision of a qualitied bat biologist. Implementation of *Mitigation Measure BIO-3* would reduce impacts on roosting bats to a less than significant level, requiring that a habitat assessment of buildings to be removed by a qualified bat biologist and implementing the specific recommendations of the assessment.

Significance Level:
Less than Significant with Mitigation Incorporated

Mitigation:

**Mitigation Measure BIO-1:** To avoid or minimize impacts to passerines and raptors that may be nesting in trees:

1) Grading or removal of nesting trees should be conducted outside the nesting season, which occurs between approximately February 1 and August 31.

2) If grading between August 31 and February 1 is infeasible and groundbreaking must occur within the nesting season, a pre-construction nesting bird (both passerine and raptor) survey of the grasslands and adjacent trees shall be performed by a qualified biologist within 7 days of ground breaking. If no nesting birds are observed no further action is required and grading shall occur within one week of the survey to prevent "take" of individual birds that could begin nesting after the survey.

3) If active bird nests (either passerine and/or raptor) are observed during the pre-construction survey, a disturbance-free buffer zone shall be established around the nest tree(s) until the young have fledged, as determined by a qualified biologist. Active nesting is present if a bird is sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest.

4) If pre-construction nesting bird surveys identify active nests, no site disturbance (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, demolition, and grading) shall occur until a qualified biologist has established a temporary protective buffer around the nest(s). For any raptor species, a Qualified Biologist, experienced in raptor behavior should be assigned to monitor the behavior of any raptors nesting within disturbance distance of Project activities. The buffer shall be of sufficient size to protect the nesting site from construction-related disturbance and shall be established by a qualified biologist. The Qualified Biologist shall have authority to order the cessation of all Project activities within disturbance distance of any raptor nest if the birds exhibit abnormal nesting behavior which may cause

reproductive failure (nest abandonment and loss of eggs and/or young). No-work buffers are species- and site-specific, as determined by a qualified biologist. Typically, the no-work radius is 100-250 feet for songbirds and up to 1,000 feet for special-status raptors.

5) The nest buffer, where it intersects the project site, shall be staked with orange construction fencing or orange lath staking. Any active nests and burrows shall be monitored by a qualified biologist to ensure compliance with the relevant Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) requirements. The biologist shall document monitoring efforts and provide documentation to the applicant and County. No-work nest protection buffers may be removed and/or reduced if the qualified biologist determines the young have fledged the nest, the nest has otherwise become inactive due to natural cause (i.e., storm events or predation), or if the qualified biologist determines in coordination with CDFW that construction activities are not likely to adversely affect the nest. The qualified biologist and CDFW may agree upon an alternative monitoring schedule depending on the construction activity, season, and species potentially subject to impact.

6) A report of the findings shall be prepared by a qualified biologist and submitted to the County prior to the initiation of construction-related activities that have the potential to disturb any active nests and or burrows. The report shall include recommendations required for establishment of protective buffers as necessary to protect nesting birds and ground nesting species. A copy of the report shall be submitted to the County and applicable regulatory agencies prior to the issuance of a grading permit.

**Mitigation Monitoring BIO-1:** Building/grading permits shall not be approved for issuance by Permit Sonoma staff until the above note is printed on all construction plans including plans for building and grading. Prior to construction and through completion of initial site disturbance, Permit Sonoma staff shall verify that all surveys have been conducted according to applicable protocols and shall review the results of all pre-construction surveys and any measures recommended by the biologist to avoid sensitive habitat or species and ensure compliance. If the survey determines protective buffers are necessary, ground disturbing activities shall not be initiated until the applicant provides evidence that nest protection buffers are flagged and fenced off and active nest monitoring has been initiated.

A final monitoring report shall be submitted to the County within 30 days of the completion of ground disturbing activities.

**Mitigation Measure BIO-2:** To prevent take of individual roosting bats, trees shall only be removed during periods of seasonal bat activity (i.e., trees can be removed March 1-April 15 and August 31-October 15). Trees shall be removed on two consecutive days in a two-step process. On Day 1, the lower branches of the tree up to 15 feet in height should be removed

using chainsaws only (no excavators or other heavy machinery). On Day 2, the remainder of the tree may be removed using any type of equipment.

**Mitigation Monitoring BIO-2:** Building/grading permits shall not be approved for issuance by Permit Sonoma staff until the above note is printed on all construction plans including plans for building and grading. Prior to construction and through completion of initial tree removal, Permit Sonoma staff shall verify that the two-step process has been conducted.

**Mitigation Measure BIO-3:** To prevent impacts to individual roosting bats, a bat habitat assessment of the buildings to be removed should be conducted by a qualified bat biologist. Surveys shall be conducted immediately prior to demolition (within 1 to 2 days). If the biologist determines there is potential for maternity roosting bats to be present within a structure propose for demolition, nighttime emergence surveys shall be performed to determine if maternity roosting bats are present. If bat maternity roosts are present, the biologist shall establish an appropriate protection buffer around the maternity roost. Once all young have become independent of the roost, construction may take place in the former protection buffer and the building can be demolished.

**Mitigation Monitoring BIO-3:** Building/grading permits shall not be approved for issuance by Permit Sonoma staff until the above note is printed on all construction plans including plans for building and grading. Prior to construction/demolition and through completion of initial site disturbance, Permit Sonoma staff shall verify that the habitat assessment and any required emergence surveys have been completed. If the assessment determines protective buffers are necessary, demolition and ground disturbing activities shall not be initiated until the applicant provides evidence that protection buffers are flagged and fenced off. A final bat assessment and monitoring report shall be submitted to the County within 30 days of the completion of ground disturbing activities.

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

Comment:
There is no known riparian habitat or sensitive natural community on the project site. Thus, no riparian habitat or sensitive natural community would be affected by the project.

Significance Level:
No Impact

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

Comment:
Vegetation on the project site consist of non-native grassland and landscape vegetation on the north western tip of the project site; the remainder and majority of the project site is comprised of compact gravel. The project site drains towards an incised roadside ditch which parallels Highway 116 along the east side of the proposed development area. The ditch is maintained and was lacking any wetland vegetation at the time of the biology site survey.

Other drainages on-site lack an ordinary high-water mark and lack any wetland vegetation and, therefore, would not qualify as Waters of the U.S. or State, including wetlands. These drainages occur within the paved portion of the site and were created to allow drainage of the property.

As part of the project's storm water quality management, riprap would be placed in two locations: one in the north associated with proposed retention basin #1 and one in the south associated with proposed retention basin #2.

The project site does not contain federally protected wetlands and would not impact existing stormwater conditions on the site.

Significance Level:
Less than Significant

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

Comment:

**Wildlife Movement/Corridors**
The study area is located in North Coast Ecoregion (Spencer et al. 2010). The natural drainages in the area (e.g., Blucher Creek) flow east into the Laguna, north into the Russian River, and west into the Pacific Ocean. The study area is not within a Natural Landscape Block (defined as relatively natural habitat blocks that support native biodiversity). The study area is not located in an Essential Connectivity Area (defined as areas that are essential for ecological connectivity between blocks) (Spencer et al. 2010).

Movement corridors for small mammals occur between the project site parcel and potentially occupied parcels to the north and south. An unnamed tributary to Blucher Creek is located 400 feet south of the parcel.

There are no barriers to movement between this site and other undeveloped lands on the west side of Highway 116. The highway acts as a barrier to small animal movement; however, the crossing of the unnamed tributary underneath the highway provides access east and west.

The proposed project would not substantially 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. Open area would occur around the proposed development, allowing for wildlife to continue to move through the area. As a result, no impacts to movement corridors for wildlife would occur.

Wildlife habitats are typically distinguished by vegetation type, with varying combinations of plant species providing different resources for use by wildlife – including as nursery sites. Three wildlife habitats occur on the proposed development area: non-native grassland, individual trees, and anthropogenic structures.

**Non-native Grasslands**
Non-native grasslands typically provide foraging, hunting and nesting habitat for a wide variety of wildlife species. Small species using this habitat as primary habitat include reptiles and amphibians, such as southern alligator lizard (*Gerrhonotus multicarinatus*), western fence lizard and Pacific slender salamander (*Batrachoseps attenuatus*), which feed on invertebrates found within and beneath vegetation and rocks within the vegetation community. The grasslands on the site are typical of heavily mowed non-native grasslands and provide reduced habitat for small mammals, such as Botta's pocket gopher (*Thomomys bottae*), the evidence of which was observed. Based on the height of the grass and the mowing frequency other species typically occurring on the site, such as western harvest mice (*Reithrodontomys megalotis*) and house mice (*Mus musculus*), are not likely to occur in the grassland due to the lack of cover. The lack of cover also prevents ground nesting passerines (perching birds), such as California quail (*Lophortyx californicus*), mourning dove (*Zenaidura macroura*), and meadowlark (*Sturnella neglecta*), to use the site. It is also likely that feral cats are in high numbers in the area given the rural nature of the site. Avian species inured to human habitation, such as California towhee (*Pipilo crissalis*), Anna's hummingbird (*Calypte anna*), American crow (*Corvus brachyrhynchos*), and western scrub-jay (*Aphelocoma californica*) forage were observed foraging in the grasslands. Although typically nesting in trees, no nests were observed in the trees at the time of the surveys.

**Individual Trees**
Individual trees are foraging and nesting habitat for passerines and roosting habitat for bats. Smaller passerines, such as chestnut-backed chickadee (*Poecile rufescens*), bushtit (*Psaltriparus minimus*), plain titmouse (*Baeolophus inornatus*), and acorn woodpecker (*Melanerpes formicivorus*) may forage in the larger trees, feeding on insects on the bark. No large cavities that may support the larger raptors, such as great horned owl *(Bubo virginianus*), were observed in any of the trees. No smaller cavities that may provide potential nesting habitat for

tree swallows (*Tachycineta bicolor*) and white-breasted nuthatch (*Sitta carolinensis*) were observed either. No past or present evidence of stick nests were observed in the trees; however, there is potential for birds to begin nesting at any time.

Solitary-roosting bats consist of females, either alone or with young, or solitary males. Colonial-roosting bats may form maternity colonies in tree cavities or crevices, caves, mines, bridges, or other manufactured structures. During the day, these roosts provide shelter and protection for adult females and their young, which remain in the roost while females forage at night, returning to nurse and care for their young. Greater impacts to bats can occur as a result of removal of trees that support cavity-roosting bat species than those that provide habitat for solitary foliage-roosting species.

**Buildings**
Many colonial bat species have adapted to using structures such as houses, barns, sheds, garages, bridges, and culverts. Statewide and in the project region, buildings provide significant roosting habitat for bat species, including more common species such as Brazilian free-tailed bat (*Tadarida brasiliensis*) and Yuma myotis (*Myotis yumanensis*), as well as more rare species such as pallid bat (*Antrozous pallidus*) and Townsend's big-eared bat (*Corynorhinus townsendii).* The age and type of structure within the project area may support roosting bats.

As stated in item 4 (a), above, construction of the project would impact raptors that could potentially nest in trees in the project area. Implementation of Mitigation Measure BIO-1 would reduce impacts to raptors to a less than significant level by conducting grading and removal of trees outside of nesting season. If that is infeasible, then a pre-construction nesting bird survey shall be performed; a disturbance free buffer zone shall be established, if any active bird nests are found. Additionally, removal of trees are part of construction of the project may cause direct mortality of roosting bats, if the trees provide suitable roosting habitat and are removed during seasonal periods of inactivity (maternity season or winter). Implementation of *Mitigation Measure BIO-2* would reduce potential impacts on roosting bats to a less than significant level by requiring that trees be removed during a period of seasonal activity using a two-step fashion: first, remove the lower branches of the tree up to 15 feet in height on the first day, and then remove the remainder of the tree the next day. This will create a suitable disturbance and change in habitat conditions to make the trees unsuitable for roosting bats when the removal is occurring.

As stated in item 4 (a), above, renovation, removal, and demolition of buildings during project construction may cause direct mortality of roosting bats that use the structures, if the structures are removed during seasonal periods of inactivity (maternity season or winter), or without first conducting humane bat evictions or partial dismantling under supervision of a qualitied bat biologist. Implementation of *Mitigation Measure BIO-3* would reduce impacts on roosting bats to a less than significant level, requiring a habitat assessment of buildings to be removed by a qualified bat biologist and implementing the specific recommendations of the assessment.

Significance Level:
Less than Significant with Mitigation Incorporated

Mitigation:
See **Mitigation Measures BIO-1, BIO-2**, and **BIO-3**, above.

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

Comment:
Chapter 26, Article 88. Sec. 26-08-010 (m) of the Sonoma County Code contains a tree protection ordinance (Sonoma County 2013). The ordinance designates "protected" trees and provides mitigation standards for impacts to protected trees.

A Tree Survey Report has been prepared for the project by Merlin Arborist Group (March 1, 2024) and is included in Appendix C. As part of the Tree Survey Report, the project site was surveyed and 33 trees were identified on the project site. (See Figure 7, *Tree Survey*.) The most notable trees are two very large giant sequoias located on a mound above an irrigated lawn north of the existing residence. The northern edge of the property has a row of redwood trees and additional giant sequoia trees. These trees are significantly smaller and younger than two larger sequoia trees and do not appear to be irrigated.

Nine of the 33 trees are within the area of disturbance for the project or immediately adjacent to it. These trees would need to be removed for construction. With regard to the remaining 24 trees, the Tree Survey Report includes identifying tree protection zones (TPZs) to avoid impacts during demolition and construction. (See Figure 8, *Tree Protection Zones*.)

None of the trees designated for removal are identified as "protected" trees under Sonoma County Code.

Significance Level:
Less than Significant Impact

**Figure 8.** ***Tree Survey***

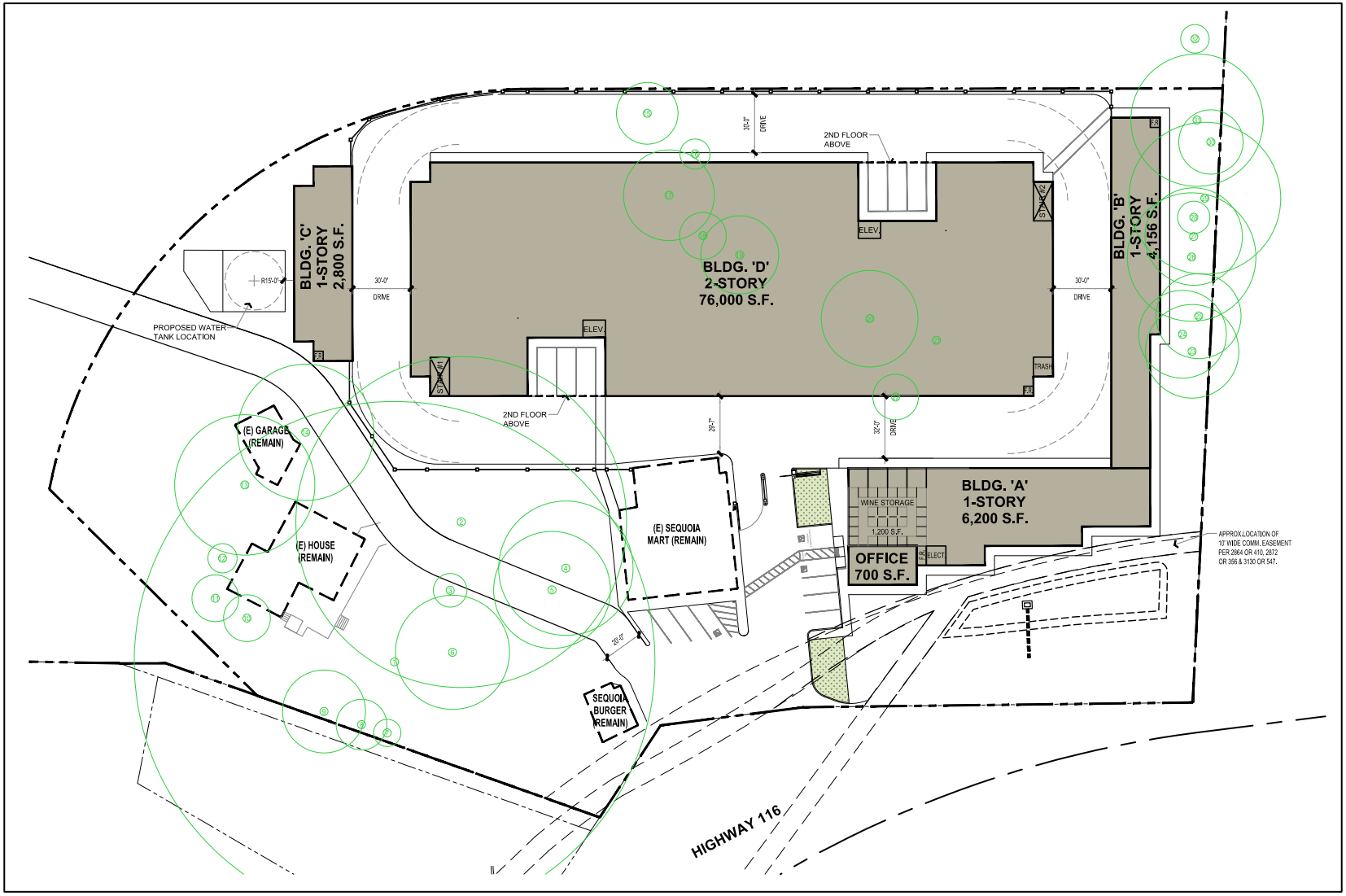


**Figure 9, *Tree Protection Zones***

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

Comment:
Habitat Conservation Plans and natural community conservation plans are site-specific plans to address effects on sensitive species of plants and animals. The project site is not located in an area subject to a habitat conservation plan or natural community conservation plan.

Significance Level:
No Impact

# 5. CULTURAL RESOURCES:

A Historic Resources Evaluation Report was prepared for the project by Archaeological/Historical Consultants (April 20, 2022) and is included as Appendix D. Additionally, a Cultural Resources Evaluation was prepared by Archeological Resource Service (August 12, 2019) and is included as Appendix E.

**Would the project:**

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

Comment:
The project site is currently developed with five major buildings, including one single-family residence and four commercial buildings. Two of the commercial buildings (Sequoia Burger and the Sequoia Mini Mart) are located on the northeast side of the project area and have frontage on Highway 116 South. The other two commercial buildings (former Discount Alley and West County Glass Company) are located behind (west of) Sequoia Burger and Sequoia Mini Mart and set back 100 feet or more feet from the highway.

None of the buildings located at 1382 Highway 116 South have been previously evaluated or listed under any local, State, or Federal historic resource designation criteria. In order for a resource to be eligible for the California Register, it must satisfy all of the following three criteria (A, B, & C):

A. A property must be significant at the local, State, or national level, under one or more of the following four “Criteria of Significance:”
   1. The resource is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history and cultural heritage of California or the United States;
   2. The resource is associated with the lives of persons important to the nation or to California's past;

3. The resource embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values;
4. The resource has the potential to yield information important to the prehistory or history of the state or the nation;

B. The resource retains historic integrity (defined below); and

C. The resource is 50 years old or older (except for rare cases of structures of exceptional significance).

The historic integrity of the Sequoia Burger fast food restaurant and Sequoia Mini Mart have been significantly compromised by major additions and remodeling. The buildings do not retain historic integrity from original construction in 1960. Even if these buildings retained a higher level of historic integrity, they do not appear to have significant associations with local themes or cultural patterns of significance; thus, the buildings do not appear to be eligible for California Register Criterion 1. Historic research did not identify any significant figures in local history associated with either of the buildings; thus, they do not appear to be significant under California Register Criterion 2. The buildings are not sufficiently exceptional or distinguished example of the commercial retail architecture of the 1960s in the Sebastopol area to be eligible under California Register Criterion 3. As such, the Sequoia Burger and Sequoia Mini Mart buildings do not appear eligible for the California Register, because they are not significant under California Register Criteria 1, 2, or 3 and their historic integrity has been compromised.

The single-family home has been extensively remodeled with a number of modern additions. The exterior walls appeared to have been rebuilt with new siding, windows, and doors. The porches on the north (front) and the east are modern additions. The original windows appear to have been replaced. Given these many alterations and renovations, the house does not retain historic integrity from its original construction in circa 1910. Even if the house retained a higher level of historic significance, it does not appear to have significant association(s) with local themes or cultural patterns of significance; thus, the building does not appear to be eligible for California Register Criterion 1. Historic research did not identify any significant figures in local history associated with the house; thus, it does not appear to be significant under California Register Criterion 2. The house is not a sufficiently exceptional or distinguished example of the Colonial Revival or Neo-Classical Revival in the Sebastopol area to be eligible under California Register Criterion 3. In conclusion, the single-family home appears not eligible for the California Register, because it is not significant under California Register Criteria 1, 2 or 3 and its historic integrity has been compromised.

Although built in stages, the former Discount Alley building appears to retain historic integrity from its original construction in the 1960s and does not appear to have been significantly altered since that period. However, the building does not appear to have significant associations

with local themes or cultural patterns of significance; thus, the building does not appear to be eligible under California Register Criterion 1. Historic research did not identify any significant figures in local history associated with the building; thus, it does not appear to be significant under California Register Criterion 2. The building is not a sufficiently exceptional or distinguished example of the commercial retail architecture of the 1960s in the Sebastopol area to be eligible under California Register Criterion 3. In conclusion, the former Discount Alley building appears not eligible for the California Register because it is not significant under California Register Criteria 1, 2 or 3.

The historic integrity of the West County Glass Company barn has been compromised by the modern alterations and additions to the original east and south façades. A number of features on the two extant façades suggest it is likely that the barn was constructed prior to 1890. Historical research suggests the barn may have been originally built as a tobacco barn. Beginning in the 1860s, tobacco was grown in the Sebastopol to Guerneville area, because of shortages caused by the Civil War. Even if it is not a tobacco barn, the building is a rare surviving example of a barn in the Sebastopol area and thus potentially eligible under California Register Criterion 3 – provided it retains a higher level of historic integrity. If further research establishes the building is a tobacco barn, it would likely be significant in local architectural history as a rare surviving building associated with tobacco cultivation in the 19th Century and thus eligible for California Register Criterion 1. Historic research did not identify any significant figures in local history associated with the building; thus, it does not appear to be significant under California Register Criterion 2. The numerous additions obscure the original shape of the building; the apparent reconstruction of the roof truss system and the extensive remodeling of the interior has affected the barn's integrity of design, workmanship, and feeling such that it no longer conveys its significance. In conclusion, the West County Glass Company barn appears not eligible for the California Register because its historic integrity has been compromised.

Although not eligible for the California Register, the West County Glass Company barn retains historic features worth preserving and documenting. The following measures would be implemented.

1. Offer the building for $1 to anyone who is willing to move it to another location. If this option is selected, the structure must be moved prior to operation of the project.
2. If the building cannot be moved, salvage the exterior wood plank siding, the hand-finished timbers of the frame, or other features of historic interest for use in another building or a museum.
3. Before moving or salvaging the barn, prepare historic documentation of the barn such as measurements, drawings, and/or high-resolution digital photography. Donate the documentation to a local historic society archive or the history room at the Sonoma County Library in Santa Rosa.

The five buildings at 1382 Highway 116 South near Sebastopol were built at different times for different purposes. They are not connected to each other aesthetically, historically, or by common construction techniques. The complex of buildings, therefore, appears not eligible for the California Register as an historic district.

As a result, the buildings on the site are not considered historical resources for the purposes of CEQA. Therefore, development of the project with mitigations incorporated would have less than significant impact on historical resources.

Significance Level:
Less than Significant Impact with Mitigation Incorporated

Mitigation:

1. **Mitigation Measure CUL-1.** Offer the West County Glass Company barn for $1 to anyone who is willing to move it to another location. If this option is selected, the structure must be moved prior to operation of the project.

2. **Mitigation Measure CUL-2.** If the West County Glass Company barn cannot be moved, prior to demolition the applicant shall inventory the architectural elements to re-use on site or donate to the Sonoma County Historical Society or other appropriate archival facility. Any associated artifacts or other architectural elements that are feasible to archive or store shall be salvaged. The associated artifact or architectural element shall be carefully removed and properly stored for reuse or delivered to the archive facility in good condition to be used in future conservation work.

3. **Mitigation Measure CUL-3**. Before moving or salvaging the West County Glass Company barn, prepare historic documentation of the barn such as measurements, drawings, and/or high-resolution digital photography. Donate the documentation to a local historic society archive or the history room at the Sonoma County Library in Santa Rosa.

Mitigation Monitoring:

**Mitigation Monitoring CUL-1, CUL-2 and CUL-3.** Prior to issuance of any demolition or grading permit(s), the County shall verify that salvage and storage of appropriate architectural elements has been conducted.

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

Comment:
The Cultural Resources Evaluation prepared for the project included a review of literature and a surface examination of the project site. The results of the literature review concluded that no

significant or potentially significant resources were identified in the project site. No significant or potentially significant artifacts, archaeological deposits, or features have been identified within the project area. Based on a review of available literature on the prehistoric and historic resources of the area, as well as a field survey, it appears that the proposed project would not impact known cultural resources. Additionally, the potential for undiscovered subsurface resources to be present due to the alluvial soil underlying the project area is considered low.

The California Native American Heritage Commission (NAHC) works to identify, catalogue, and protect places of special religious or social significance, graves, and cemeteries of Native Americans per the authority given the Commission in Public Resources Code 5097.9. A check with the NAHC was done to determine if there are sites listed in the Sacred Lands file located within or near to the current project area. The project area lies within the territory claimed by the Federated Indians of Graton Rancheria (FIGR).

On December 23, 2023, Permit Resource Management Department (PRMD) staff referred the project application to Native American Tribes within Sonoma County to request consultation under AB52 (the request for consultation period ended 30 days later on January 24, 2024). No requests for consultation were received.

Although the project has a low possibility of containing unrecorded archaeological sites and no impacts to archaeological resources are anticipated, the County has a standard "accidental discovery" condition of approval that work be halted if unanticipated buried cultural resources are encountered during construction. The condition is applied to all use permits that involve ground disturbance, and requires that the following notes be printed on all grading and building permit plans involving ground disturbing activities:

> "If prehistoric or historic archaeological resources, paleontological resources, or tribal cultural resources are encountered during ground-disturbing work, all work in the immediate vicinity shall be halted and the operator must immediately notify the Permit and Resource Management Department (PRMD) – Project Review staff of the find. The applicant shall be responsible for the cost to have a qualified paleontologist, archaeologist or tribal cultural resource specialist under contract to evaluate the find and make recommendations to protect the resource in a report to PRMD. Paleontological resources include fossils of animals, plants or other organisms. Prehistoric resources include humanly modified stone, shell, or bones, hearths, firepits, obsidian and chert flaked-stone tools (e.g., projectile points, knives, choppers), midden (culturally darkened soil containing heat-affected rock, artifacts, animal bone, or shellfish remains), stone milling equipment, such as mortars and pestles, and certain sites features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe. Historic resources include all by-products of human use greater than fifty (50) years of age including, backfilled privies, wells, and refuse pits;

concrete, stone, or wood structural elements or foundations; and concentrations of metal, glass, and ceramic refuse.

If human remains are encountered, work in the immediate vicinity shall be halted and the operator shall notify PRMD and the Sonoma County Coroner immediately. At the same time, the operator shall be responsible for the cost to have a qualified archaeologist under contract to evaluate the discovery. If the human remains are determined to be of Native American origin, the Coroner must notify the Native American Heritage Commission within 24 hours of this identification so that a Most Likely Descendant can be designated and the appropriate measures implemented in compliance with the California Government Code and Public Resources Code."

Therefore, the proposed project would not result in substantial adverse change in the significance of archaeological resource as defined in CEQA Guidelines Section 15064.5.

Significance Level:
Less than Significant

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

Comment:
The project site is not located within the vicinity of any known unique paleontological resources or site. However, there is a potential to encounter unknown subsurface human remains as a result of grading and excavation for the project. In the unlikely event the site contains a burial site, compliance with Section 11-14-050 of the Sonoma County Construction Grading and Drainage Code and the accidental discovery standard condition noted above would ensure necessary steps are taken to protect the resource.

Significance Level:
Less than Significant

## 6. ENERGY

**Would the project:**

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

Comment:

**Construction**
Standard construction practices would be used. As such, energy would be required to operate and maintain construction equipment and transport construction materials. Most energy consumption would result from operation of off-road construction equipment and on-road vehicle trips associated with commutes by construction workers and haul trucks trips. The one-time energy expenditure required to construct the infrastructure associated with the projects would be nonrecoverable.

The energy needs for project construction would be temporary and are not anticipated to require additional capacity or substantially increase peak or base period demands for electricity and other forms of energy. Associated energy consumption would be typical of that associated with self-storage facilities of a similar size. Although the one-time energy expenditure required to construct the project would be nonrecoverable, it would not be consumed in a wasteful, inefficient, or unnecessary manner.

**Operational**
Operation of the project would require energy consumption in the form of electricity for building and facility operations and fuel for vehicle-based visitation to the project. The project would be built according to the latest Title 24 Building Energy Efficiency Standards and would replace existing uses built at a time when energy conservation measures were not as stringent as they are today. The proposed project would use low amounts of energy compared to other commercial uses, predominantly in the lighting and general building operation of the storage facility. The project would meet State and local building code requirements for energy efficiency. Low Emitting Diode (LED) lighting systems would be installed utilizing lighting timers and dimmers. Transportation energy demand from the implementation of the project would be reduced by Federal and State regulations including the Low Carbon Fuel Standard, Clean Car Standards, and Low Emission Vehicle Program. Thus, the project's energy consumption from construction, building operation, and transportation would not be considered wasteful, inefficient, or unnecessary.

Significance Level:
Less than Significant Impact

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

Comment:
Implementation of the project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As noted above, the project would comply with the latest Title 24 Building Energy Efficiency Standards, which are intended to increase the energy

efficiency of new development projects in the State and move the State closer to its zero-net energy goals. The project would use low amounts of energy compared to other commercial uses due to the low intensity of the use; energy use would predominantly be in the lighting and general building operation of the storage facility. The project would meet State and local building code requirements for energy efficiency. LED lighting systems would be installed utilizing lighting timers and dimmers. The project would be automatically enrolled as a member of the Sonoma Clean Power (SCP), which serves as the Community Choice Aggregate (CCA) for the County. SCP works in partnership with Pacific Gas & Electric (PG&E) to deliver GHG-efficient electricity to customers within its member jurisdictions. The project would also be all electric for energy efficiency and fossil fuel use reduction.

Significance Level:
Less than Significant Impact

## 7. GEOLOGY AND SOILS:

**Would the project:**

**a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

**i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

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

Comment:
The site is not located in a State of California Alquist-Priolo Earthquake Fault Studies Zone or on a known fault based on the Safety Maps in the Sonoma County General Plan. The three closest known active faults are comprised of the Rodgers Creek fault (located 7.6 miles to the northeast), the San Andreas fault (located 12.51 miles to the southwest), and the Maacama fault (located 14.66 miles northeast of the site).

Significance Level:
Less than Significant Impact

**ii. Strong seismic ground shaking?**

Comment:
The site is not located in a State of California Alquist-Priolo Earthquake Fault Studies Zone. The three closest known active faults are comprised of the Rodgers Creek fault (located 7.6 miles to the northeast), the San Andreas fault (located 12.51 miles to the southwest) and Maacama fault (located 14.66 miles northeast of the site). The maximum earthquake event expected to occur on the closest fault, the Rodgers Creek fault, is estimated at 7.3 (moment magnitude). Future damaging earthquakes could occur on any of these faults during the lifetime of the project, with the distance to the causative earthquake epicenter determining the intensity of the ground shaking.

All of Sonoma County is subject to seismic shaking that would result from earthquakes along the San Andreas, Rodgers Creek, and other faults. By applying geotechnical evaluation techniques and appropriate engineering practices, potential injury and damage from seismic activity can be diminished, thereby exposing fewer people and less property to the effects of a major damaging earthquake.

The design and construction of new structures are subject to engineering standards of the California Building Code (CBC), which takes into account soil properties, seismic shaking, and foundation type. Project conditions of approval require that building permits be obtained for all construction and that the project meet all standard seismic and soil test/compaction requirements. The project would, therefore, not expose people to substantial risk of injury from seismic shaking.

Significance Level:
Less than Significant

**iii. Seismic-related ground failure, including liquefaction?**

Comment:
During a strong seismic ground shaking event possible earthquake effects can occur. The project site has a low risk of fault rupture, lateral spreading and lurching, landslides, and expansive soil shrink and swell cycles.

**Fault Rupture.** Rupture of the ground surface is expected to occur along known active fault traces. According to the State of California, no active faults exist at or near the project site. Therefore, the likelihood of ground rupture at the site due to faulting is considered to be low. While fault rupture cannot be entirely dismissed because the site is located in an active tectonic area, the degree of risk is low.

**Ground Shaking.** The site has been subjected in the past to ground shaking by earthquakes on active fault systems that traverse the region. It is believed that earthquakes with significant

ground shaking will occur in the region within the next several decades, and the project site could be subjected to strong ground shaking during the design life of the project. However, construction would occur in accordance with State and County regulations directed at minimizing the risk to people and structures due to ground shaking.

**Lateral Spreading and Lurching.** Lateral spreading is normally induced by vibration of near-horizontal alluvial soil layers adjacent to an exposed face. Lurching is an action that produces cracks or fissures parallel to streams or banks when the earthquake motion is at right angles to them. There are no creeks or exposed faces at or near the project site. Therefore, the risk of lateral spreading and lurching at the building site is low.

**Liquefaction.** Liquefaction is the sudden loss of shear strength in saturated sandy material. According to the Association of Bay Area Governments (ABAG), the site is located in an area that is considered to have low liquefaction susceptibility. Areas of Sonoma County most at risk of liquefaction are along San Pablo Bay and in alluvial valleys. The subject site is not identified on the map in Safety Element (PS-1c) as Very High, High or Medium Liquefaction Hazard Areas. Additionally, exploratory boreholes conducted at the project site encountered shallow bedrock, which is not considered prone to liquefaction. Therefore, liquefaction occurring at the site is low.

Significance Level:
Less than Significant Impact

**iv. Landslides?**

Comment:
Based on the Geotechnical Investigation (PJC & Associates, Inc.; updated May 3, 2022) which is included as Appendix F, a review of the CGS geologic map of the Santa Rosa 7.5 Minute Quadrangle and the California Division of Mines and Geology, Geology for Planning in Sonoma County, Special Report 120, there are no landslides on or adjacent to the site. The site is mapped in an area of greatest relative stability due to low slope inclination. The risk of landsliding at the site is low.

Significance Level:
Less than Significant Impact

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

Comment:
The current project site is generally flat. The project would require finish grading to accommodate the self-storage facility. Grading would involve approximately 8,695 cubic yard of cut and 1,038 cubic yards of fill. Approximately 7,657 cubic yards of earth would be exported.

Unregulated grading, both during and post construction, has the potential to increase the volume of runoff from a site, which could have adverse downstream flooding and further erosion impacts. An increase in soil erosion on- and off-site could adversely impact downstream water quality. County grading ordinance design requirements, adopted County grading standards and best management practices (such as silt fencing, straw wattles, construction entrances to control soil discharges, primary and secondary containment areas for petroleum products, paints, lime and other materials of concern, etc.), mandated limitations on work in wet weather, and standard grading inspection requirements would be applied to the project, and are specifically designed to prevent soil erosion and loss of topsoil.

The County adopted grading ordinances and standards and related conditions of approval that enforce them are specific and also require compliance with all standards and regulations adopted by the State and Regional Water Quality Control Board, such as the Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, Low Impact Development (LID), and any other adopted best management practices. Therefore, no significant adverse soil erosion or related soil erosion water quality impacts are expected given the mandated conditions and standards that must be met.

Significance Level:
Less than Significant Impact

**c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**

Comment:
The project site could be subject to ground shaking during a seismic event. The project site and surrounding areas are not located in an area prone to landslides or in an area subject to lateral spreading, subsidence, liquefaction, or collapse. See also discussions under items 6 (a) ii, iii, and iv, above.

Significance Level:
Less than Significant Impact

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

Comment:
The surface soils are predominantly granular or consist of low to non-plastic sandy silts. These strata are not considered expansive. Based on laboratory testing, the site bedrock has moderate plasticity properties, which suggest a moderate expansive potential. However,

bedrock is not prone to detrimental shrink and swell cycles. The proposed project would replace existing top 18 inches of soil with low or non-expansive material. Therefore, risks from expansive soils would be less than significant.

Significance Level:
Less than Significant Impact

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

Comment:
The project site currently supports septic tanks for disposal of waste water. The project would be required to submit a "Wastewater Analysis and Inspection Findings" report in compliance with the Sonoma County Onsite Wastewater Treatment System (OWTS) Manual and to have capacity/wastewater flow analysis and proper functioning of the wastewater systems inspections completed by a Registered Civil Engineer or Registered Environmental Health Specialist regarding the existing septic systems' ability to accommodate the project peak flows. Final clearance from Sonoma County PRMD Well and Septic Division would be required, demonstrating that all required septic system testing and design elements have been met.

Significance Level:
Less than Significant Impact.

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

Comment:
Within Sonoma County, paleontological remains have been primarily recovered from the following geologic formations:

- Franciscan complex (Jurassic) – This formation largely covers the northern part of the County, with the exception of the Alexander Valley and northern Santa Rosa plain;

- Wilson Grove Formation (Miocene-Pliocene) – This is a common location for paleontological remains and is largely located in the western part of the county, along with the Ohlson Ranch Formation (Miocene-Pliocene) and the Petaluma Formation. The boundaries of this area are Occidental, Sebastopol, Petaluma, and the Coast. These formations are also present around the base of the Sonoma Mountains; and

- Sonoma Volcanics (Miocene-Pliocene) – This is the formation of the Sonoma Mountains and the Sonoma/ Napa Mountains, which form the eastern border of the County.

Based on the Geotechnical Investigation (Appendix F) prepared for the project, the project site is underlain by sandstone bedrock of the Wilson Grove Formation – a formation where paleontological resources are known to occur. The project would require grading that would involve approximately 8,695 cubic yards of cut and 1,038 cubic yards of fill. Therefore, there is a potential for unknown subsurface paleontological resources to be encountered during grading, resulting in a potentially significant impact to paleontological resources. The project would implement *Mitigation Measure GEO-1*, which would reduce impacts to below a level of significance.

Significance Level:
Less Than Significant with Mitigation Incorporated

Mitigation:

**Mitigation Measure GEO-1:**
If any paleontological resources are found during grading and construction activities, all work within 100 feet of the find shall cease, the County of Sonoma shall be notified, and the applicant shall retain an appropriately qualified paleontologist to determine the significance of the discovery. A Qualified Paleontologist shall evaluate the discovery, including defining the physical extent and nature of the deposit. If necessary, the evaluation shall include preparation of a treatment plan, such as avoidance of the discovery, documentation of the paleontological resources, or salvage of palaeontologic resources, to mitigate any significant impacts to paleontological resources.

**Mitigation Monitoring GEO-1:** Building/grading permits shall not be approved for issuance by Permit Sonoma staff until the above note is printed on all construction plans including plans for building and grading. If any paleontological resources are found during grading and construction activities, a final monitoring report shall be submitted to the County within 30 days or completion of ground disturbing activities.

# 8. GREENHOUSE GAS EMISSIONS:

An evaluation of the project's greenhouse gas emissions has been prepared (Updated Sequoia Mini Storage Development Air Quality and Greenhouse Gas Emissions Assessment, May 5, 2022) and is included as Appendix A.

**Would the project:**

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

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

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

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

Because GHG emissions from the land use sector come primarily from building energy use and from transportation, these are the areas that the BAAQMD evaluated to ensure that a project can and will do its fair share to achieve carbon neutrality. With respect to building energy use, the BAAQMD recommends replacing natural gas with electric power and eliminating inefficient or wasteful energy usage. This will support California's transition away from fossil fuel–based

energy sources and will bring a project's GHG emissions associated with building energy use down to zero as the state's electric supply becomes 100 percent carbon free. With respect to transportation, the BAAQMD recommends that projects be designed to reduce project-generated Vehicle Miles Travelled (VMT) and to provide sufficient electric vehicle (EV) charging infrastructure to support a shift to EVs over time.

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

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

There is currently no applicable local GHG reduction strategy, like an adopted Climate Action Plan, for Sonoma County. Therefore, the project was analyzed under criterium A above, as discussed below.

Buildings: As discussed in the Energy Section 6a, the project includes new construction. Plans for the new structures do not include the use of natural gas appliances or natural gas plumbing; the site will use electrical power from Sonoma Clean Power. The aggregate use of new storage and associated office structures would result in energy use similar to most commercial uses, including powering of lighting, heating/cooling systems, and employee support spaces, like offices and restrooms. Therefore, impacts due to energy consumption would be less than significant.

Transportation: The cultivation project does not include new residences, office buildings, or commercial retail, and therefore, does not contribute any VMT to these three land use categories of concern. (Note that "office projects" refers to commercial office spaces, not to a small ancillary office space associated with another land use). The project would include construction of approximately 89,000 square feet of storage buildings (745 storage units plus approximately 1,200 square feet of wine storage), and approximately 700 square feet of accessory office space. One employee would be onsite in the office during daytime operating hours.

GHG emissions associated with development of the proposed project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. There would also be long-term operational emissions associated with vehicular traffic within the project vicinity, energy and water usage, and solid waste disposal. Emissions from the project were computed for information purposes. Emissions for the proposed project are discussed below and were analyzed using the methodology recommended in the BAAQMD CEQA Air Quality Guidelines.

**Construction GHG Emissions**
GHG emissions associated with construction were computed to be 467 metric tons (MT) of $CO_2e$ for the total construction period. These are the emissions from on-site operation of construction equipment, vendor and hauling truck trips, and worker trips. Neither the County nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions, although BAAQMD recommends quantifying emissions and disclosing that GHG emissions would occur during construction. BAAQMD also encourages the incorporation of best management practices to reduce GHG emissions during construction where feasible and applicable.

**Operational GHG Emissions**
Annual GHG emissions resulting from operation of the proposed project are predicted to be 274 MT of $CO_2e$ in 2024, when the facility is fully operational. Emissions are expected to decrease in the future such that levels in 2030 would be less.

**GHG Reduction Goals**
Sonoma County has adopted by resolution policy targets to reduce GHGs levels. The project would be consistent with the County's GHG Reduction Goals as demonstrated by the Sequoia Mini Storage Development Air Quality and Greenhouse Gas Emissions Assessment, May 5, 2022.

A summary of project compliance with the County's GHGs reduction goals applicable to the project is provided below.

**Building Energy**

1) *Increase building energy efficiency*
   - The project is compliant as it would meet State and local building code requirements for energy efficiency.
   - LED lighting systems would be installed.
   - Lighting timers and dimmers would be utilized.

2) *Increase renewable energy use*
   - Sonoma Clean Power is the default electrical utility provider for the site, which relies on reliance and renewable power sources.

3) *Switch equipment from fossil fuel to electricity*
   - The project does not propose natural gas connections.

**Transportation & Land Use**

4) *Reduce travel demand through focused growth*
   - The project is a local self-storage facility that serves the need of the local public.

**Solid Waste**

9) *Increase solid waste diversion*
   - The project is compliant, as it would meet the Sonoma County and local recycling goals.

**Water & Wastewater**

11) *Reduce Water Consumption*
   - The project is compliant and would include low-flow water fixtures and small landscaped areas with water-efficient irrigation systems.
   - Drought tolerant landscaping would be installed around the facility.
   - Gray water would be used for on-site landscape irrigation.

**Advanced Climate Initiatives**

19) *Increase carbon sequestration*
   - The project is compliant, as its landscape would increase productive vegetation that sequesters carbon. The current site is mostly devoid of vegetation.

The project results in a less than significant GHG impact.

<u>Significance Level:</u>
Less than Significant Impact

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

Comment:
The County's adopted goals and policies include GP Policy OSRC-14.4 to reduce GHG emissions to 25 percent below 1990 levels by 2015. Sonoma County emissions in 2015 were nine percent below 1990 levels, while the countywide population grew four percent.

In May 2018, the County Board of Supervisors adopted a Resolution of Intent to Reduce Greenhouse Gas Emissions that included adoption of the Regional Climate Protection Agency's goal to further reduce GHG emissions by 40 percent below 1990 levels by 2030 and by 80 percent below 1990 levels by 2050, consistent with the State's climate pollution reduction targets (Senate Bill (SB) 32 and Assembly Bill (AB) 197). The Resolution of Intent included specific measures that can further reduce GHG emissions.

All new development is required to evaluate all reasonably feasible measures to reduce GHG emissions and enhance carbon sequestration. The following GHG emission reduction measures were incorporated into the project by the applicant and are included as a condition of approval:

- Electrical Service will come from Sonoma Clean Power.
- No on-site natural gas or propane usage.
- Construction to CalGreen Standards or higher.

By incorporating these project elements, the project would be consistent with the Resolution of Intent and would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Significance Level:
Less than Significant Impact

## 9. HAZARDS AND HAZARDOUS MATERIALS:

A *Phase I Environmental Site Assessment* (ESA) was conducted for the project site (AEI; August 17, 2022) and is included as Appendix G. The results of the ESA are provided in the discussion below.

**Would the project:**

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

Comment:
The project uses do not involve the routine transport, use, or disposal of hazardous materials. However, it is possible that improper handling or storage could result in minor spills or drips of

hazardous materials such as oil, fuel, or paint during or after construction. To address this possibility, the project is required to comply with all applicable hazardous materials handling and storage requirements and would use qualified contractors for construction.

During operations, the storage, use, and disposal of hazardous materials would be associated with household hazardous materials such as cleaners, paint, and landscape maintenance chemicals. Hazardous materials similar to those used during construction could also be used periodically as part of operation, maintenance, and repair of the utilities infrastructure and facilities.

The project applicant, builders, and contractors would be required to use, store, and transport hazardous materials in accordance with local, State, and Federal regulations, including Cal/OSHA and State Department of Toxic Substance Control (DTSC) requirements and manufacturer's instructions. In so doing, impacts would be less than significant.

Significance Level:
Less than Significant Impact

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

Comment:
Based on a review of aerial photographs, the project site was historically used for agricultural purposes. There is a potential that agricultural chemicals, such as pesticides, herbicides, and fertilizers, were used on-site, and that the project site has been affected by the use of such agricultural chemicals. In general, historical agricultural use is not the subject of environmental enforcement actions by regulatory agencies and, therefore, would be considered a de minimis condition. Nonetheless, the project applicant would conduct soil sampling relating to the former agricultural use of the prior to the commencement of project construction. Should toxic substances be discovered at levels that exceed standards, appropriate measures would be undertaken for disposal in accordance with County and State requirements.

Railroad tracks were historically located to the southwest of the property. Railroad tracks and spurs represent environmental concerns due to the historical application of oils containing polychlorinated biphenyls (PCBs), herbicides, and arsenic for pest and weed control, as well as the potential presence of creosote on the rail ties and the historical common practice of using coal cinders for track fill material. Concentrations of these constituents of concern resulting from the railroad right-of-way would likely be confined to the near subsurface sediments and would not present a significant environmental health and safety concern of the project or the underlying groundwater.

An active underground petroleum pipeline is located to the southwest of the project site. No stressed vegetation was observed near the pipeline during the site reconnaissance and no known environmental concerns associated with the pipeline have been reported. Releases from this pipeline (other than those caused by a third party) would be the responsibility of the operator. Based on this information, and the lack of a documented release identified in the regulatory database, no further action regarding the pipeline is warranted at this time.

Toxic PCBs were commonly used historically in electrical equipment such as transformers, fluorescent lamp ballasts, and capacitors. According to United States EPA regulation 40 CFR Part 761, there are three categories for classifying such equipment: <50 parts per million (ppm) of PCBs is considered "Non-PCB;" between 50 and 500 ppm is considered "PCB-Contaminated;" and >500 ppm is considered "PCB-Containing." Pursuant to 15 U.S.C. 2605(e)(2)(A), the manufacture, process, or distribution in commerce or use of any PCB in any manner other than in a totally enclosed manner was prohibited after January 1, 1977. The management of potential PCB-containing transformers is the responsibility of the local utility or the transformer owner. Actual material samples need to be collected to determine if transformers are PCB-containing. Transformers installed prior to 1977 may be PCB containing while transformers installed after 1977 are unlikely to be PCB containing. Federal Regulations (40 CFR 761 Subpart G) require any release of material containing >50 ppm PCB and occurring after May 4, 1987, be cleaned up by the transformer owner following the United States EPA's PCB spill cleanup policy. There are four pole mounted transformers on the project site, owned and maintained by PG&E, and are presumed to have been installed around 1983 – putting them in the post 1977 install period and making them unlikely to contain PCB. Evidence of spills, staining, or leaks on or around the transformers was not noted from the site reconnaissance. Based on the good condition of the equipment, the transformers are not expected to represent a significant environmental concern.

Minor amounts of oily surface staining were observed in the parking area. The staining appears to be from leaking vehicles and is surficial in nature. Based on the small size and the surficial nature of the staining, it is not expected to represent a significant environmental concern.

Large quantities of trash, debris, and abandoned vehicles were identified across the area of the abandoned residence. Most junk and debris appeared to be household in nature, with some electronics, parts, and unidentified features. Based the site reconnaissance, the presence of debris and trash is not expected to represent a significant environmental concern.

The project site obtains potable water from a private water well. Based on the nature of use of the well, the presence of the well is not expected to represent a significant environmental concern.

The project site is equipped with an on-site septic system for the treatment and disposal of domestic waste. Based on the use of the system solely for domestic waste, and since no

hazardous substances or petroleum products are utilized on-site, the presence of this septic system is not expected to represent a significant environmental concern.

One pole-mounted transformer was observed on an adjoining site during the site reconnaissance. No spills, staining, or leaks were observed on or around the transformer. Based on the good condition of the equipment, the transformer is not expected to represent a significant environmental concern.

Several storm drains were observed in the parking areas of the adjoining properties and adjoining roadways. No evidence of hazardous substances or petroleum products in the vicinity of the drains was observed during the site reconnaissance. Based on the use of the drains solely for storm water runoff, the presence of the drains is not expected to represent a significant environmental concern.

A water production well was observed at the adjoining site to the west. Based on the nature of use of the well, the presence of the well is not expected to represent a significant environmental concern.

The potential for Asbestos-Containing Materials (ACM) was evaluated based the United States EPA Guidance Document: Managing Asbestos in Place - A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials (the Green Book). Due to the age of the subject property buildings, there is a potential that ACMs are present. Demolition of several buildings located on the project site is proposed to allow for development of the self-storage facility. The EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) requires that a thorough asbestos survey be performed prior to demolition or renovation activities that may disturb ACMs. This requirement may be enforced by Federal, State, and local regulatory agencies, and specifies that all suspect ACMs be sampled to determine the presence or absence of asbestos prior to any renovation or demolition activities that may disturb them to prevent potential exposure to workers, building occupants, and the environment.

Due to the age of the buildings on-site, there is a potential that LBP is present. Stringent local and State regulations may apply to Lead Based Paint (LBP) in association with building demolition/renovations and worker/occupant protection.

Radon is a naturally-occurring, odorless, invisible gas. Natural radon levels vary and are closely related to geologic formations. Radon may enter buildings through basement sumps or other openings. According to the California Department of Health Services Radon Database, 31 tests were conducted for radon levels in the project zip code (95472) in 2016. All of these tests indicated that radon levels were below the action level of 4.0 pCi/L set forth by the United States EPA. Therefore, radon is not expected to represent a significant environmental concern.

Based on the above information, the 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.

Significance Level:
Less than Significant Impact

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

Comment:
The project site is not located within one-quarter mile of an existing or proposed school. The nearest school to the project site is SunRidge Elementary School, located three-quarter mile from the site. The project proposes construction of a self-storage facility and would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste.

Significance Level:
Less than Significant Impact

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

Comment:

The proposed project is not located on a site identified as a hazardous materials site.

Significance Level:
No Impact

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

Comment:
The project is not located within an airport land use plan or within two miles of a public airport. The closest airports are Cloverdale, Healdsburg, Petaluma, and Sonoma – well outside the two

miles stipulated. The closest airport is the Sonoma County Airport at over 7.97 miles northeast of the proposed project site. As such, no impacts relative to airport land use plans or airports would occur.

Significance Level:
No Impact

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

Comment:
The project would not impair the implementation of or physically interfere with any adopted emergency response or evacuation plans. The proposed project is expected to generate one fewer trip during the morning peak hour and 15 fewer during the evening peak hour than existing uses to be eliminated. The project would, therefore, have a minor beneficial effect on traffic operation and emergency response times.

Sight distance from the driveway location along Highway 116 is adequate in both directions. Access and circulation for emergency response vehicles are expected to function adequately.

Significance Level:
No Impact

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

Comment:

According to the Safety Element of the General Plan, the project site is not located in a high wildland fire hazard area but is adjacent to an area identified as having moderate wildland fire potential. The construction of new structures in accordance with current building standards would decrease the fire risk to structures on the project parcel. New construction on the site would conform to County Fire Safe Standards building requirements. Fire Safe Standards include building requirements related to fire sprinklers, stairways, roofs, fire apparatus access roads, door panic hardware, fire resistant stairway enclosures, emergency water supply (in the form of an approximately 100,000 gallon water tank), and defensible space would be utilized. The construction of new structures in accordance with current building standards should decrease the risk to the proposed project. Fire abatement measures would be supported by a fire pump and the proposed water storage tank . The project would not require installation or maintenance of associated infrastructure that would exacerbate fire risk. The project would not expose people to significant risk from wildland fires.

Significance Level:
Less than Significant Impact

# 10. HYDROLOGY AND WATER QUALITY:

The following analysis is based on information contained in the Design Review Stormwater Management Narrative For Initial SWLID (Dimensions 4 Engineering, Inc.; August 27, 2020), which is included in Appendix H.

**Would the project:**

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

Comment:

**Hydrology/Drainage**
Existing drainage features in the project vicinity include a constructed drainage channel that separates the project site from Highway 116 and a natural drainage that exists approximately 400 feet southerly of the proposed development on a separate parcel. These features intersect approximately 150 feet southeasterly of the existing parcel entrance. At this location, flows continue beneath Highway 116 for approximately 4,300 feet in a northeasterly direction towards the Laguna.

Current improvements to the drainage channel are limited to the addition of riprap protection and channel mats to aid in erosion and sediment control. Runoff sheet flows historically from the west, passes through the existing developed area, and enters the roadside drainage.

**Water Quality**
With regard to water quality, standard permitting procedures require a Grading Permit and associated Erosion Prevention and Sediment Control Plan for the proposed cuts, fills, or other movement of soils to construct the proposed project, to which all applicable standards and provisions of the Sonoma County Grading and Drainage Ordinance would apply. In addition, construction activities that involve disturbing one or more acres of ground, including the project site and any off site staging or disposal areas, are subject to the requirements of the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Runoff Associated with Construction Activity (General Construction Permit). Construction activities include clearing, grading, excavation, stockpiling, and reconstruction of existing facilities involving removal and replacement. Applicants of construction projects must file for coverage under the General Construction Permit by submitting a complete Notice of Intent (NOI) package to the SWRCB and developing and implementing a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP

must contain a site map that shows the construction site perimeter; existing and proposed buildings, lots, roadways, and storm water collection and discharge points; general topography both before and after construction; and drainage patterns across the project site. The SWPPP must include the Best Management Practices (BMPs) that the applicant will use to protect the quality of storm water runoff and the placement of those BMPs.

The project site is located in an area subject to the North Coast RWQCB Municipal Separate Storm Sewer Systems (MS4) Permit. The proposed project would involve placement of more than 10,000 square feet of impervious surface area. Therefore, the project must both meet the requirements of the Sonoma County Storm Water Quality Ordinance and incorporate LID and BMPs contained in the City of Santa Rosa and County of Sonoma Storm Water Low Impact Development Technical Design Manual.

The proposed project would include the construction of two retention basins, which provide treatment and infiltration factor for storm water gathered within proposed improvements prior to entering the existing drainage. Storm water runoff from the developed site would be intercepted westerly of the proposed buildings by a proposed vegetated swale, which reduces the amount of clean runoff from passing though the new and existing development. The swale would convey the waters southwesterly towards Pleasant Hill Creek and be allowed to sheet flow infiltration prior to entering the creek. The interior storm water gathered from this proposed facility shall be collected by on-site drains, drop inlets, and storm drains prior to being deposited into the proposed bioretention basins. The project does not propose changes to off-site drainage patterns.

Because the project proposes an increase and/or replacement of impervious areas over one acre, LID requirements would be incorporated into the project such that no increase in storm water volume between pre- and post-development would occur. The project would be consistent with storm water treatment and capture requirements of Low Impact Development (LID) and the County's Grading Ordinance. No additional treatment or volume capture is required.

Any increase in pollutant discharge from the proposed paving and structures would be minimized by the proposed retention basins, adjacent vegetated slopes, and proposed landscaping, as well as proper maintenance and stewardship by owner. Runoff Reduction Measures would be incorporated into the project, including maintaining established evergreen and deciduous interceptor trees to the extent possible, the proposed interceptor tree plantings, and impervious area disconnection. Impervious area disconnection includes the existing residence, metal shed, and proposed Building A. Maintenance for all BMPs and storm drain infrastructure shall be at the direction/funding of applicant/owner. Proposed landscape plantings shall be managed to ensure health of plants/trees while at the same time confirming that they do not impede on function of bioretention basins, vegetated swales, and their related out fall devices. Regular monthly or bi-monthly landscaping maintenance, at the direction of

the owner, would be implemented for the facility and bioretention basins. Use of natural nontoxic alternatives to fertilizers, herbicides, and pesticides would be utilized whenever possible. Self-storage facility management, at direction of owner/applicant, would evaluate the proposed storm drain network and each bioretention basin prior to, during (when practical), and after winter storm events to verify that system is functioning properly. If obstructions or complications to the systems are observed, immediate action will be taken to clear system.

Additionally, the project description includes the following maintenance measures:

- Surrounding vegetated slopes not affected by the project shall be maintained.
- Trash enclosures shall be covered, and tenants shall be directed to notify management immediately if any pollutant enters the collection system.
- Storm drain inlets shall be labeled with "No Dumping, Drains to Creek" decals (Contact Storm Water and Creeks at (707) 543-4200 for more information).
- Garbage cans, to allow for small nuisance waste, shall be provided/emptied within the facility daily. Dumpster lids shall be kept closed to keep rain out and debris in. To ensure dumpsters do not leak, any drain holes shall be plugged.
- There are no anticipated indoor pollutant uses/sources in this storage facility. However, should a spill occur, double containment bins within the unit will be required by the tenant. Restrictions on fluids allowed will be depicted in the facility rental agreement. Spill cleanup materials shall be available to trained employees should an unexpected spill be observed.
- Street sweeping will be implemented as necessary by facility staff.
- Facility shall be monitored at least once a day for pollution mitigation/prevention.

The proposed project would not increase offsite drainage patterns and would employ strategies designed to infiltrate stormwater through interceptor trees, landscaping, a large swale, and two bioretention basins, complying with Hydromodification 100 & Volume Capture requirements. Retention basins would be installed to collect any excess runoff on-site, ensuring flow rates off-site do not exceed current levels. Additionally, Runoff Reduction Measures would be incorporated into the project and include the existing established evergreen large-diameter and deciduous interceptor trees.

**Wastewater**
With regard to wastewater discharge requirements, the project site is not located in an area served by public sewer. Septic systems and leachfields currently exist on the project site to treat domestic wastewater. Any improvements or modifications to the existing septic system would comply with the Building Regulations listed in Chapter 7 of the Sonoma County Code of Ordinances, which would require that approval be obtained from the Well and Septic section of Permit and Resource Management Department. In addition, prior to building permit issuance and occupancy, the applicant shall have a capacity/wastewater flow analysis by a Registered

Civil Engineer or Registered Environmental Health Specialist regarding the existing septic system's ability to accommodate the peak flows from all sources granted.

Significance Level:
Less than Significant Impact

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

Comment:
The project is located in the Wilson Grove Formation Highlands Basin. The Basin is managed by the North Marin Water District and the Sonoma County Water Agency.

The project site is currently developed with a single-family residence of approximately 2,150 square feet, with a detached garage of approximately 730 square feet; two existing commercial buildings (West County Glass Company and Discount Alley) encompassing 7,960 square feet; an existing market, Sequoia Mart, consisting of approximately 3,600 square feet; and Sequoia Burger, a fast-food restaurant of approximately 500 square feet. The two existing commercial buildings would be demolished to allow development of the self-storage facility. The existing market (Sequoia Market) and a fast-food restaurant (Sequoia Burger) would remain.

On-site development is currently served by on-site wells. The proposed self-storage facility would also use groundwater for potable water use in employee restrooms; however, self-storage is not a water-consuming land use. Continued use of groundwater would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

Significance Level:
Less than Significant Impact

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

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

Comment:
The proposed project would not increase off-site drainage patterns and would employ strategies designed to infiltrate stormwater through interceptor trees, landscaping, a large swale, and two retention basins, complying with Hydromodification 100% Volume Capture requirements. Runoff Reduction Measures include the existing established evergreen large-diameter and

deciduous interceptor trees. Retention basins would collect any excess runoff on-site, ensuring flow rates off-site do not exceed current levels.

Significance Level:
Less than Significant Impact

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

Comment:
The project would comply with Sonoma County LID standards requiring 100 percent on-site infiltration of the design storm (one inch of rain over 24 hours). The infiltration features incorporated in the site design would capture the storm water runoff for most small to moderate precipitation events throughout the year.

In accordance with Sonoma County Code (Section 36.16.030) the project's drainage systems would be designed to maintain pre-project drainage patterns and to convey the 25-year design storm without causing on- or off-site flooding. The drainage systems would be engineered to the specification of the Sonoma County Flood Management Design Manual and would undergo a comprehensive review by the Sonoma County Water Agency before permit approval. This review would ensure that the hydrologic analysis for the project considers the prescribed design storm, local precipitation rates, rainfall intensity, and runoff coefficients, and that the applicant has used an appropriate hydrologic baseline. The proposed drainage improvements must also demonstrate that the project would not cause adverse flooding or drainage effects to existing or proposed structures or to adjacent properties. Because the Sonoma County permitting process includes protections through the drainage system design and review, the potential for the potential for the projects to result in on- or off-site flooding would be less than significant.

Significance Level:
Less than Significant Impact

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

Comment:
See discuss above under items 10 (a) and (c).

Significance Level:
Less than Significant Impact

**iv. Impede or redirect flood flows?**

Comment:
See discuss above under items 10 (a) and (c).

Significance Level:
Less than Significant Impact

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

Comment:
The project site is not located in a flood hazard, tsunami, or seiche zones.

Significance Level:
No Impact

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

Comment:
The project site is not located in a priority groundwater basin as defined under the as defined under the Sustainable Groundwater Management Act (SGMA).

The project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan.

Significance Level:
No Impact

## 11. LAND USE AND PLANNING:

**Would the project:**

**a) Physically divide an established community?**

Comment:
The proposed project involves construction of a self-storage facility on a site with existing commercial development and located in a pocket of commercial and industrial development along Highway 116. The project would not physically divide an established community.

Significance Level:

No Impact.

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

Comment:
The Land Use Element of the Sonoma County General Plan includes the countywide land use policy framework and addresses more specific Land Use Policies for the County's nine Planning Areas. The project site is located within the Sebastopol and Environs Planning Area, which includes the City of Sebastopol; the communities of Graton, Bloomfield, and Valley Ford; and portions of the Laguna. The Planning Area is characterized by extensive areas of rural development that are mixed with small farms and orchards. Land use issues in this Planning Area involve urban development in Sebastopol and Graton, strip development along Highway 116, and expansion of rural residential development.

The following specific planning Objective and Policies for the Sebastopol and Environs Planning Area are applicable to the proposed project. The discussion that follows each applicable Objective and Policy addresses the project's consistency.

> **Objective LU-17.3**
> Assure that commercial development in rural portions of the area is of a scale, intensity, and design which is compatible with the area's rural and scenic character.

The proposed project would be consistent with the applicable planning Objective and Policies. The project has been designed to be compatible with the immediate surrounding area rural character, which is made up with a mix of commercial structures, open storage lots, and single-family residential developments. Furthermore, as discussed in Item 1, *Aesthetics,* the project would be consistent with applicable Open Space & Resource Conservation Element policies and would not negatively affect the area's scenic qualities.

> **Policy LU-17e**
> Avoid new "Limited Commercial" and "Limited Industrial" designations outside of the Sebastopol and Graton Urban Service Areas.

The project site is currently developed with a variety of commercial uses. The project would replace some existing commercial uses with a self-storage facility. While the project would introduce a new commercial use type to the area, it would not result in adding new Limited Commercial uses, as those already existing on the project site.

> **Policy LU-17f**
> Avoid discretionary projects on "Limited Commercial" or "Limited Industrial" lands unless the use:

(1) Serves the commercial, service, employment or agricultural processing needs of the planning area;
(2) Is compatible with adjacent residential or agricultural uses;
(3) Would not adversely affect the level of service on public roadways or interfere with the movement of farm vehicles;
(4) Provides mitigation for visual impacts within a designated Scenic Corridor through appropriate setbacks, landscaping, and/or screening; and
(5) Is in keeping with the scale and character of the community.

The project requires Design Review approval, which is a discretionary action. Consistent with Policy LU-17f, the project would provide a use that serves the commercial, service, and employment needs of the Planning Area. The project replaces existing commercial uses and its design and scale is compatible with its location along Highway 116. Additionally, project design keeps with the scale and character of the surrounding development. The project would result in a reduction in trips and would, therefore, not adversely affect the level of service on public roadways or interfere with the movement of farm vehicles. As described in Item 1, *Aesthetics*, the project site is within a designated Scenic Corridor and includes appropriate setbacks and landscaping to minimize the project's visual effect.

**Policy LU-17n**
Refer to the City of Sebastopol for review and comment any application for discretionary projects in the vicinity of the Urban Service Boundary.

The project site is located within the Urban Service Boundary for the City of Sebastopol. As part of the Design Review, input has been solicited from the City of Sebastopol via project review by the Design Review Committee.

The project site is designated as Limited Commercial on the General Plan Land Use Map. The Limited Commercial land use designation allows a range of commercial uses. In rural community areas, such as where the project site is located, this category is intended to accommodate retail sales and services for the daily self-sufficiency of local neighborhoods or communities in keeping with their character. Structures generally are not expected to cover more than 50 percent of the site or exceed thirty-five feet in height. The Land Use Element of the General Plan allows additional height, if a reduction in coverage is provided that results in no overall increase in building intensity. Commercial uses shall require Design Review approval and on-site parking.

The project is consistent with the Limited Commercial land use designation. It provides for a commercial use that serves for the daily self-sufficiency of local neighborhoods or communities and keeps with their character. Lot coverage would be 3.98 acres, building heights would be a maximum of 30 feet in height, and the project would provide on-site parking (27 spaces). The project is subject to Design Review.

The project site is zoned Limited Commercial (LC). Consistent with Limited Commercial land use designation, the LC zone provides areas for retail sales and services necessary for the daily self-sufficiency of urban and rural areas in keeping with their character. Self-storage (Personal Storage) is an allowable use in the LC zone. For the project site, which is not served by public water or sewer service, the minimum lot size requirement for the zone is 1.5 acres. The project site encompasses 4.03 acres and is, therefore, consistent with the lot size requirement of the zone. There are no minimum setbacks for the zone. Lot coverage is limited to 50 percent of the project site, and the zone has a maximum building height of 35 feet. Lot coverage for the project would be 3.98 acres and building height would be a maximum of 30 feet in height. Therefore, the project meets these requirements.

The proposed project is consistent with the land use designation and zone for the site. The project would not conflict with any land use plan, policy, or regulation adopted for the site. Therefore, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Significance Level:
No Impact

## 12. MINERAL RESOURCES:

**Would the project:**

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

Comment:
Sonoma County has adopted the Aggregate Resources Management Plan that identifies aggregate resources of statewide or regional significance (areas classified as MRZ-2 by the State Geologist). The project site is not located within a known mineral resource deposit area.

Significance Level:
No Impact

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

Comment:
The project area has not been delineated on a local General Plan, Community Plan, specific plan, or other land use plan as a locally important mineral resource recovery site, and no such resources would be affected with project implementation. The project site is not located within

an area of locally-important mineral resource recovery site and the site is not zoned MR (Mineral Resources). No locally-important mineral resources are known to occur at the site. The project would not result in the loss of availability of a local important mineral resource recovery site. See also item 12 (a) above.

Significance Level:
No Impact

## 13. NOISE:

**Would the project:**

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

Comment:

The primary goal of the Noise Element of the Sonoma County General Plan is to "[p]rotect people from the adverse effects of exposure to excessive noise and to achieve an environment in which people and land uses function without impairment from noise."

The existing noise environment for the project is characterized by vehicular noise levels due to motorists traveling Highway 116. The project does not propose noise sensitive land uses. (Noise sensitive land uses are generally such uses as residences; schools; hospitals; nursing homes; long-term, and medical or mental care facilities; churches; and libraries.) Because the project does not propose any noise sensitive land uses, the project avoids locating noise sensitive land uses in a noise impacted area.

**Construction Noise**
The primary noise source from project construction (including demolition, grading, and building construction) would be from site preparation. Grading could require the use of heavy equipment such as bulldozers, loaders, and scrapers. No blasting or pile-driving would be necessary. Haul trucks could be used to import/export fill to/from the project site. Sound levels of typical construction equipment range from approximately 65 to 95 dBA at 50 feet from the source. Worst-case noise levels are typically associated with grading.

Construction of the project would generate an increase in noise in the project area. The increase in noise level would be primarily experienced close to the noise source. The magnitude of the impact would depend on the type of construction activity, noise level generated by various pieces of construction equipment, duration of the construction phase, acoustical shielding, and distance between the noise source and receiver. However, construction noise

would be temporary, would occur primarily during day-time hours and on weekdays, and would cease once construction is complete. Project construction noise impacts would be less than significant.

**Operational Noise**
Operational noise impacts are associated with a substantial increase in noise generated by a land use and on-site mechanical equipment. The project would generate less trips than are currently generated by on-site uses. Therefore, the project would contribute less vehicular noise than the existing condition.

Other than vehicle noise, self-storage is not a noise-generating land use. A well water pump and mechanical elements to a water tank (required for fire flow) already occur on the project site. The project may require upgrading or replacement of the existing facilities to better serve the proposed self-storage use. Upgraded and/or new equipment would meet current industry standards with respect to minimizing noise. Project operational noise impacts would be less than significant.

Significance Level:
Less than Significant Impact

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

Comment:
Proposed project construction could result in vibration due to grading and compacting, as well as the construction of the self-storage facility. However, any vibration would be temporary and is not expected to be excessive.

Significance Level:
Less than Significant Impact

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

Comment:
The proposed project is not within a two mile vicinity of an airstrip or airport. The closest airport to the proposed project is the Sonoma County Airport at 7.97 miles northeast. As such, no impacts relative to airport land use plans or airports would occur.

Significance Level:
No Impact

## 14. POPULATION AND HOUSING:

**Would the project:**

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

Comment:
The project proposes the construction of a self-storage facility on the 11.34 -acre site. The project site is currently developed with a single-family residence of approximately 2,150 square feet, with a detached garage of approximately 730 square feet; two existing commercial buildings (West County Glass Company and Discount Alley) encompassing 7,960 square feet; an existing market, Sequoia Mart, consisting of approximately 3,600 square feet; and Sequoia Burger, a fast-food restaurant of approximately 500 square feet. The two existing commercial buildings would be demolished to allow development of the self-storage facility. The existing market (Sequoia Market) and a fast-food restaurant (Sequoia Burger) would remain.

The proposed project would not include construction of residential uses. Rather, the project proposes a change in commercial use for the property; existing residential use would not be displaced. The project would not require the extension of roads or other infrastructure. The project would result in a net reduction in employee number. Thus, the project would not induce substantial unplanned population growth in an area, either directly or indirectly.

Significance Level:
No Impact

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

Comment:
The proposed project does not include any housing and would not demolish the existing residence on the project site. Thus, the project would not displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere.

Significance Level:
No Impact

## 15. PUBLIC SERVICES:

**Would the project:**

**a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

Comment:
The project would not increase residents or employees such that governmental services and/or facilities will have to be expanded. The project does not anticipate more than 1 employee maximum at a time during operating hours and would result in a net reduction on total employee count having replaced the West County Glass Company and Discount Alley. The project would not result in the need for new or physically altered public services and would not substantially affect service ratios, response times, or other performance objectives for any of the public services.

Significance Level:
Less than Significant Impact

**i. Fire protection?**

Comment:
The project site is roughly 1.3 miles from the Sebastopol Fire Department. New construction on the site would conform to County Fire Safe Standards building requirements. Fire Safe Standards include building requirements related to fire sprinklers, stairways, roofs, fire apparatus access roads, door panic hardware, fire resistant stairway enclosures, emergency water supply (an approximately 100,000 gallon water tank), and defensible space would be utilized. The construction of new structures in accordance with current building standards would decrease the risk to the proposed project. Fire abatement measures would be supported by a fire pump and water storage tank. The project would not require installation or maintenance of associated infrastructure that would exacerbate fire risk.

Significance Level:
Less than Significant Impact

**ii. Police?**

Comment:
The project site and surrounding area are served by the Sonoma County Sheriff's Department. The Sheriff's Department will continue to serve this area. There would be no increased need for police protection resulting from this project.

Significance Level:
Less than Significant Impact

**iii. Schools?**

Comment:
The project proposes the construction of a self-storage facility. The proposed use would not generate students. Thus, the project would not contribute to an increase in the need for expanded or additional schools.

Significance Level:
No Impact

**iv. Parks?**

Comment:
The project proposes the construction of a self-storage facility. The proposed use would not result in an increase in residents using public parks. Thus, the project would not contribute to an increase in the need for expanded or additional parks.

Significance Level:
No Impact

**v. Other public facilities?**

Comment:
The project would not increase residents or employees such that governmental services and/or facilities will have to be expanded. The project does not anticipate more than 1 employee maximum at a time during operating hours and would result in a net reduction on total employee count having replaced the West County Glass Company and Discount Alley. The project would not result in the need for new or physically altered public services and would not substantially affect service ratios, response times, or other performance objectives for any of the public services.

Significance Level:
Less than Significant Impact

## 16. RECREATION:

**Would the project:**

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

Comment:
The project proposes the construction of a self-storage facility. The proposed project would not involve activities that would cause or accelerate substantial physical deterioration of parks or recreational facilities. The project will have no impact on the use of existing neighborhood and regional parks or other recreational facilities.

Significance Level:
No impact

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

Comment:
The project proposes the construction of a self-storage facility. The proposed project does not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment as it does not propose to build any recreational uses.

Significance Level:
No Impact

## 17. TRANSPORTATION:

A Traffic Study was performed by for the project by W-Trans (May 2023) and is included as Appendix I.

**Would the project:**

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

Comment:
The project proposes the construction of a 99,157-square-foot self-storage facility. The project would demolish some existing uses on-site, including a 1,753-square-foot glass art building and a 6,208-square-foot discount store. An existing residence, market, and fast-food restaurant would remain.

The 11.34 -acre project site is located at 1382 Highway 116 South, unincorporated Sebastopol. Highway 116 forms the project site's frontage and would provide direct access

to the self-storage facility. Although Highway 116 generally runs east-west, it has more of a north-south alignment in the project area. Along the project frontage, Highway 116 has two 12-foot travel lanes and shoulders that vary from about two to five feet in width. Traffic counts obtained from the California Department of Transportation (Caltrans) indicate that the roadway is carrying an average of about 25,400 vehicles per day. The posted speed limit near the project site is 40 miles per hour (mph). In general, because of its rural location, there are no pedestrian facilities in the vicinity of the proposed project site.

The Traffic Study found that, due to the elimination of some commercial uses and the development of the less traffic-intensive self-storage use, the proposed project would be expected to result in a reduction of daily trips at the driveway, as well as during the morning (AM) and afternoon (PM) peak hours. As shown in Table 7, *Trip Generation Summary,* replacement of the discount store and glass art uses with self-storage units is expected to reduce site-generated traffic by 125 trips daily, with one fewer trip during the morning peak hour and 15 fewer trips during the evening peak hour.

**Table 7 – Trip Generation Summary**

| Land Use | Units | Daily | | AM Peak Hour | | | | PM Peak Hour | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Rate | Trips | Rate | Trips | In | Out | Rate | Trips | In | Out |
| **Existing to be Removed** | | | | | | | | | | | |
| *Discount Store* | -6.21 ksf | 54.45 | -338 | 2.36 | -15 | -9 | -6 | 6.59 | -41 | -21 | -20 |
| *Pass-by* | | *20%* | *68* | *35%* | *5* | *3* | *2* | *-40%* | *11* | *6* | *5* |
| ***Total Deduction*** | | | ***-270*** | | ***-10*** | ***-6*** | ***-4*** | | ***-30*** | ***-15*** | ***-15*** |
| ***Proposed*** | | | | | | | | | | | |
| Mini-Warehouse | 99.86 ksf | 1.45 | 145 | 0.09 | 9 | 5 | 4 | 0.15 | 15 | 7 | 8 |
| **Net New Trips** | | | **-125** | | **-1** | **-1** | **0** | | **-15** | **-8** | **-7** |

Note: ksf = per 1,000 square feet

The proposed project would not conflict with any program, plan, ordinance, or policy addressing the circulation system including transit, roadways, bicycle, and pedestrian facilities. The proposed project is expected to generate fewer trips than the existing uses that it would replace. Pedestrian and transit facilities are adequate to serve the project site, especially considering the rural location. Bicycle facilities are adequate but would be improved once the construction of Class II lanes along Highway 116 are completed (currently planned).

Relative to bicycle facilities, the *Highway Design Manual* (Caltrans, 2017) classifies bikeways into four categories:

- **Class I Multi-Use Path** – a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.
- **Class II Bike Lane** – a striped and signed lane for one-way bike travel on a street or

highway.

- **Class III Bike Route** – signing only for shared use with motor vehicles within the same travel lane on a street or highway.
- **Class IV Bikeway** – also known as a separated bikeway, a Class IV Bikeway is for the exclusive use of bicycles and includes a separation between the bikeway and the motor vehicle traffic lane. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

Class II bike lanes exist on Highway 116 approximately 0.25 mile north of the project site but not along the project frontage. Bicyclists currently ride in the roadway along the rest of Highway 116 and along all other streets within the project study area. There is a four-mile segment of Class II bike lanes planned on Highway 116, including directly along the project frontage. The proposed project does not include any buildings or structures that would preclude the future provision of the bike lane. The project is, therefore, consistent with existing plans.

Sonoma County Transit (SCT) provides fixed route bus service in Sonoma County. SCT Route 24 provides loop service to destinations throughout the City of Sebastopol and stops on Highway 116 are located one-third of a mile north of the project site. Route 24 operates Monday through Friday with approximately one-hour headways between 8:00 a.m. and 6:00 p.m. Saturday service operates with approximately one-hour headways between 8:00 a.m. and 5:00 p.m. SCT Route 24 is a free shuttle.

SCT Route 26 provides regional service between Mirabel Park and the City of Cotati and stops on Highway 116 less than 0.1 mile south of the project site. Route 26 runs on school days only, with the eastbound bus to Cotati running from the stop around 7:55 a.m., and the westbound bus to Mirabel Park running at approximately 4:00 p.m. This route is primarily for students at Sonoma State University.

Two or three bicycles can be carried on most SCT buses. Bike rack space is on a first come, first served basis. Additional bicycles are allowed on SCT buses at the discretion of the driver. While few transit trips to the site would be expected given that patrons would generally be either bringing items to store or removing them, and as such likely require use of a personal vehicle, the existing bus routes are adequate to provide a transit option for employees. The limited number of potential transit trips could be accommodated within existing capacity on the bus routes.

Significance Level:
Less than Significant Impact

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

Comment:
SB 743 established the change in vehicle miles traveled as the metric to be applied for determining transportation impacts associated with development projects. As of the time the *Transportation Study* was prepared for the project, Sonoma County had not yet adopted thresholds of significance related to VMT. As a result, project-related VMT impacts were assessed based on guidance published by the California Governor's Office of Planning and Research (OPR) in the publication *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory, 2018*. The OPR guidelines identify several criteria that may be used by jurisdictions to identify certain types of projects that are unlikely to have a significant VMT impact and can be "screened" from further analysis.

Certain types of projects, including small projects that OPR identifies as generating fewer than 110 new vehicle trips per day, are unlikely to have a VMT impact and can, therefore, be "screened" from further VMT analysis. This project would generate a daily net negative 125 trips, so this project can be presumed to have a less-than-significant impact on VMT.

Significance Level:
Less than Significant Impact

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

Comment:
The project would not increase hazards since it maintains the existing alignment of the roadway and would not create hazards from incompatible uses.

Adequacy of sight distance to allow safe movements into and out of the project's driveway off Highway 116 was evaluated as part of the *Transportation Study*. Based on the posted speed limit of 40 mph, the required stopping sight distance is 300 feet. From a point 15 feet back from the edgeline, available sight lines extend more than 400 feet in both directions from the project driveway. This is adequate for speeds of nearly 50 mph, so sufficient for the project. It is noted that the required corner sight distance for 40 mph is 385 feet for right turns and 445 feet for left turns. As sight lines extend beyond 400 feet, the sight distance available also meets this requirement for the posted speed limit. Sight distance from the driveway location along Highway 116 is adequate in both directions.

Significance Level:
Less than Significant Impact

**d) Result in inadequate emergency access?**

Comment:

According to the Sonoma County Municipal Code Section 13-37, all driveways must provide a minimum of one twelve-foot traffic lane and an unobstructed vertical clearance of fifteen feet along the entire length of the driveway. Additionally, all driveways exceeding 150 feet in length shall have a turnaround and a turnout constructed at approximately the midpoint of the driveway. The driveway leading to the project site from Highway 116 is approximately 230 feet long and 24 feet wide; the driveway follows these driveway requirements as stated in the Municipal Code. Additionally, since the project would result in a net decrease in traffic on the surrounding road network, it would have a minor beneficial impact in terms of traffic congestion that could slow emergency responders. The proposed project would result in access and circulation for emergency response vehicles to function adequately. Therefore, the project would result in less-than-significant impacts in terms of emergency response.

Significance Level:
Less than Significant Impact

## 18. TRIBAL CULTURAL RESOURCES:

**State Regulations**

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

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

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

**California Public Resources Code**

Section 5097.5 of the California PRC states:

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

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

**Codes Governing Human Remains**

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

**Would the project:**

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

**i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**

Comment:

The Cultural Resources Evaluation (A Cultural Resources Evaluation of Sequoia Mini-Storage, 1382 Highway 116 South, Sebastopol, Sonoma County, California; William Roop, M.A., RPA, Archaeological Resource Service) prepared for the project included a review of literature and a surface examination of the project site. The results of the literature review concluded that no significant or potentially significant resources were identified in the project site. No significant or potentially significant artifacts, archaeological deposits, or features have been identified within the project area. Based on a review of available literature on the prehistoric and historic resources of the area, as well as a field survey, it appears that the proposed project would not impact known cultural resources. Additionally, the potential for undiscovered subsurface resources to be present due to the alluvial soil underlying the project area is considered low.

Significance Level:
Less than Significant Impact

**ii) A resource determined by the lead agency. In its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

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

Although no impacts are anticipated, the County standard “Accidental Discovery” Condition of Approval applies to previously undiscovered TCR’s or unique archaeological resources that may be accidentally encountered during project implementation.

Significance Level:
Less than Significant Impact

**19. UTILITIES AND SERVICE SYSTEMS:**

**Would the project:**

**a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications**

**facilities, the construction or relocation of which could cause significant environmental effects?**

Comment:
The project site is not located in an area served by public sewer. Septic systems and leachfields currently exist on the project site to treat domestic wastewater. The proposed project would not require the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage utilities. The project will draw water from an existing well on-site, utilize an existing septic system for waste water, and construct new retention basins to treat storm water flows and ensure no increase in storm water drainage volume off-site. Any improvements or modifications to the existing septic system would comply with the Building Regulations listed in Chapter 7 of the Sonoma County Code of Ordinances, which would require that approval be obtained from the Well and Septic section of Permit and Resource Management Department. In addition, prior to building permit issuance and occupancy, the applicant shall have a capacity/wastewater flow analysis by a Registered Civil Engineer or Registered Environmental Health Specialist regarding the existing septic system's ability to accommodate the peak flows from all sources granted.

The project will meet State and local building code requirements for energy efficiency. LED lighting systems would be installed utilizing lighting timers and dimmers. Transportation energy demand from the implementation of the projects would be reduced by Federal and State regulations, including the Low Carbon Fuel Standard, Clean Car Standards, and Low Emission Vehicle Program. Thus, the project's energy consumption from construction, building operation, and transportation would not be considered wasteful, inefficient, or unnecessary. The project would not result in the relocation or construction of electric power utilities.

The project does not propose a natural gas connection and would not result in the relocation or construction of new natural gas facilities.

The project does not propose uses which would result in the construction of new telecommunications facilities expected to cause significant environmental effects.

Significance Level:
Less than Significant Impact

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

Comment:
Water supply for the project will be met through use of well water from an existing well, which is in operation and used to serve existing development. The groundwater is treated on-site to potable water standards. Well water level and pump flow were tested by Jerry and Don's Yager

Pump and Well Service in January 2023 and were found to be sufficient (Well Test Report, Jerry & Don's Yager Pump and Well, January 2023).

Significance Level:
No Impact

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

Comment:
The project site is equipped with an on-site septic system for the treatment and disposal of domestic waste. Based on the use of the system solely for domestic waste, and since no hazardous substances or petroleum products are utilized on site, the presence of this septic system is not expected to represent a significant environmental concern.

Significance Level:
No Impact

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

Comment:
The proposed project will result in temporary solid waste generation during demolition of the existing uses to be demolished and during construction of the self-storage facility. During construction, the proposed project would follow a construction and demolition reuse and recycling plan. Once operational, the project would not result in significant amounts of solid waste, as it is a self-storage facility.

Garbage cans, to allow for small nuisance waste, shall be provided/emptied within the facility daily. Dumpster lids shall be kept closed to keep rain out and debris in. To ensure dumpsters do not leak, any drain holes shall be plugged. There are no projected indoor pollutant uses/sources in this storage facility. Double containment bins within the unit will be required by the tenant should any potential spill be anticipated. Restrictions on fluids allowed will be depicted in the facility rental agreement. Spill cleanup materials shall be available to trained employees should an unexpected spill be observed. Street sweeping would be implemented as necessary by facility staff. Facility shall be monitored at least once a day for pollution mitigation/prevention.

Significance Level:
Less than Significant Impact

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

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

Significance Level:
Less than Significant Impact

## 20. WILDFIRE

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

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

Comment:
The proposed project is not located in a Very High or High fire hazard area as demonstrated in the Safety Element of the General Plan, Figure PS 1-G. The project is located in a flat area surrounded by open lands. The project site is roughly 1.3 miles from the Sebastopol Fire Department. New construction on the site would conform to County Fire Safe Standards building requirements. Fire Safe Standards include building requirements related to fire sprinklers, stairways, roofs, fire apparatus access roads, door panic hardware, fire resistant stairway enclosures, emergency water supply, and defensible space would be utilized. The construction of new structures in accordance with current building standards would decrease the risk to the proposed project. The project does not result in modification of any emergency response and evacuation plans.

Significance Level:
No Impact

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

Comment:
The proposed project is not located in a Very High or High fire hazard area as demonstrated in the Safety Element of the General Plan, Figure PS 1-G. The project is located in a flat area

surrounded by open lands. The project would not contribute to factors that would exacerbate wildfire risks.

Significance Level:
No Impact

**c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk of that may result in temporary or ongoing impacts to the environment?**

Comment:
The proposed project is not located in a Very High or High fire hazard area, as demonstrated in the Safety Element of the General Plan, Figure PS 1-G. The project is located in a flat area surrounded by open lands. The project site is roughly 1.3 miles from the Sebastopol Fire Department. New construction on the site would conform to County Fire Safe Standards building requirements. Fire Safe Standards include building requirements related to fire sprinklers, stairways, roofs, fire apparatus access roads, door panic hardware, fire resistant stairway enclosures, emergency water supply, and defensible space would be utilized. The construction of new structures in accordance with current building standards would decrease the risk to the proposed project. Fire abatement measures would be supported by a fire pump and water storage tank. The project would not require installation or maintenance of associated infrastructure that would exacerbate fire risk.

Significance Level:
No Impact

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

Comment:
The proposed project does not substantially alter the relatively flat project site to exacerbate risks of flooding or runoff. Two bioretention basins would insure an undisturbed flow of infiltration.

Significance Level:
Less than Significant Impact

## 21. MANDATORY FINDINGS OF SIGNIFICANCE

**a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal**

**community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Comment:
Potential project impacts on special status bird and bat species and their habitat are addressed in item 4. Implementation of the required mitigation measures (*Mitigation Measures BIO-1*, *BIO-2* and *BIO-3*) including preconstruction surveys for nesting birds and bat habitat assessment would reduce these potential impacts to a less-than-significant level.

Potential adverse project impacts to cultural resources are addressed in item 5. Implementation of the required *Mitigation Measure CR-1* to salvage and document the former West County Glass Company barn would reduce these potential impacts to a less-than-significant level.

Potential adverse project impacts to buried paleontological resources are addressed in Item 7, Geology and Soils. Implementation of required Mitigation Measure GEO-1 to stop work and document the find would reduce the potential impact to a less-than-significant level.

Mitigation:
See item 4, *Biological Resources,* **Mitigation Measures BIO-1, BIO-2 and BIO-3.**

See item 5, *Cultural Resources*, **Mitigation Measure CR-1**.

See item 7, Geology and Soils, **Mitigation Measure GEO-1**.

Significance Level:
Less than Significant Impact

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

Comment:
The project will contribute to impacts related to construction air quality, biological resources, cultural resources, and geology and soils (paleontological resources). However, most impacts would be short-term associated with construction. In addition, County standards and mitigation measures have been included that would ensure that the project's cumulative contributions would not be considerable.

Significance Level:
Less than Significant Impact

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

Comment:
Construction and operation of the project as proposed will not cause environmental effects that would significantly directly or indirectly impact human beings. Proposed project operations have the potential to cause significant adverse impacts. However, all potential impacts and adverse effects on human beings (resulting from air quality, noise, and traffic) were analyzed and would be less than significant.

Significance Level:
Less than Significant Impact

## VII. References

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California State Health and Safety Code (https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=HSC&tocTitle=+Health+and+Safety+Code+-+HSC)

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# VIII. Technical Appendices

Appendix A. Updated Sequoia Mini Storage Development Air Quality and Greenhouse Gas Emissions Assessment, Illingworth & Rodkin, Inc. (Updated: May 5, 2022).

Appendix B. Habitat Assessment, Wildlife Research Associates and Jane Valerius environmental Consulting (Updated: February 29, 2024).

Appendix C. Arborist report, Merlin Arborist Group (November 29, 2019).

Appendix D. Historic Resources Evaluation Report, Archeological/Historical Consultants (April 20, 2022)

Appendix E. Cultural Resources Evaluation, Archeological Resource Service (August 12, 2019)

Appendix F. Geotechnical Investigation, Proposed Mini Storage Facility, 1382 Highway 16 South, Sebastopol, California, PJC & Associates (Updated May, 2023)

Appendix G. Phase I Environmental Site Assessment, AEI, August 17, 2022

Appendix H. Design Review Stormwater Management Narrative For Initial SWLID, Dimensions 4 Engineering, Inc.; August 27, 2020

Appendix I. Traffic Study, W-Trans, May 2023

Appendix J. Well Test Report, Jerry & Don’s Yager Pump and Well, January 2023