

# **Application for 5-Year Temporary Water Rights Permit**

**Initial Study / Proposed Mitigated Negative  
Declaration**

Town of Windsor

April 03, 2026



# Initial Study/Proposed Mitigated Negative Declaration

## Application for 5-Year Temporary Water Rights Permit

This document has been prepared by:



Town of Windsor  
9291 Old Redwood Highway, Building 400  
Windsor, CA 95492

In collaboration with:



**GHD**  
2235 Mercury Way, Suite 150  
Santa Rosa, CA 95407

April 2026

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# 1. Project Information

<b>Project Title</b>	Application for 5-Year Temporary Water Rights Permit
<b>Lead Agency Name &amp; Address</b>	Town of Windsor 9291 Old Redwood Highway, Building 400 Windsor, CA 95492
<b>Contact Person &amp; Phone Number</b>	Elizabeth Cargay (707) 838-5385
<b>General Plan Land Uses Designation and Zoning</b>	Public-Quasi Public and Public Institutional
<b>Project Description</b>	The Town of Windsor is applying for a 5-year temporary water rights permit from the State Water Resources Control Board to divert up to 200 acre-feet annually of alluvial groundwater underflow from the Russian River during high-flow periods between December 1 and April 30 in calendar years 2027 through 2031. Diversion would occur at a rate of up to 1 cubic foot per second using the Town's existing Russian River wells. The diverted water would be conveyed through the Town's distribution system, treated, and stored in an underground aquifer as part of a previously approved Aquifer Storage and Recovery (ASR) pilot test at 10011 Los Amigos Road, APN 151-050-051. The project would not involve ground disturbance, excavation, or new construction, and would rely entirely on existing infrastructure.

## 1.1 CEQA Requirements

The proposed project is subject to the provisions of the California Environmental Quality Act (CEQA). The Town of Windsor (Town) will serve as the lead agency for CEQA compliance. The Town has prepared this Initial Study/Proposed Mitigated Negative Declaration (IS/MND) to provide the public, responsible agencies, and trustee agencies with information about the potential environmental effects of the proposed project. This IS/MND is intended to satisfy the requirements of CEQA (Public Resources Code, Div 13, Sec 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Sec 15000-15387). Section 15063(d) of the State CEQA Guidelines summarizes the content requirements of an Initial Study as follows:

- A description of the project including the location of the project;
- An identification of the environmental setting;
- An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
- A discussion of the ways to mitigate the significant effects identified, if any;
- An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and
- The name of the person or persons who prepared or participated in the Initial Study.

## 1.2 Project Location

The project would include a 5-year temporary water rights permit from the State Water Resources Control Board to divert approximately 200 acre-feet annually from the Town's existing Russian River municipal wells. The Town's Russian River well field is located on land owned by the Town, annexed into the Town of Windsor, and used for public utility purposes as part of Windsor's municipal water system near Windsor River Road. The diverted water would be conveyed through the Town's existing distribution system, treated, and stored in an underground aquifer as part of a previously approved ASR pilot test that is being conducted at a Town-owned property at 10011 Los Amigos Road, within the Town of Windsor.

## 1.3 Environmental Setting

The Town is located at the northern end of the Santa Rosa Plain Groundwater Basin in a region shown on geologic maps primarily as alluvium surficial deposits underlain by the Glen Ellen Formation. The Town of Windsor's water supply includes wells near the Russian River, off-river wells, a connection to a regional aqueduct, and pipeline networks to distribute potable and recycled water. Approximately 95 percent of the Town's potable water supply is currently obtained from wells screened in shallow alluvial deposits of the Russian River floodplain. The alluvial groundwater is considered underflow of the Russian River, and extractions are limited by contractual agreements with Sonoma Water, and by the State Water Quality Control Board limitations for Russian River diversions. The Town's Russian River well field is located approximately 300 feet from the Russian River and screened within shallow alluvial deposits of the river floodplain. The wells are located outside of the Russian River channel in an upland area adjacent to the Russian River riparian zone.

## 1.4 Project Description

The Town is applying for a 5-year temporary water rights permit from the State Water Resources Control Board to divert up to 200 acre-feet annually from the Russian River. The proposed 5-year temporary diversion permit requested by the Town would divert underflow from the Russian River in Sonoma County during high flow events in water years 2027 through 2031. Under the permit application, the Town has requested approval to divert up to 1 cubic foot per second (cfs) using the Town's existing Russian River wells between December 1 and April 30, with a maximum annual diversion volume of 200 acre-feet from the Russian River.

The diverted water would be conveyed to the Town's water distribution system, where it would be treated before being injected into an underground aquifer. It would later be extracted as part of an ASR pilot test at 10011 Los Amigos Road that will be completed in accordance with Statewide General Order 2012-0010 for ASR projects that utilize potable water for injection. ASR is a water management strategy that stores water in underground aquifers during periods of surplus (typically winter and spring) and recovers it during periods of demand (typically summer and fall).

The proposed diversion of water under the 5-year temporary water rights permit would not involve ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure and does not include earthwork, grading, or physical alterations.

The State Water Resources Control Board, Division of Water Rights conducted a preliminary watershed-level water availability analysis for the Russian River to assist in the demonstration of water availability for the proposed temporary water rights permit. Using the Division of Water Rights' Russian River Water Availability Analysis Tool, unimpaired flow, instream flow needs, and senior diverter demand were examined on a daily timestep over a 61-year simulation period to assess whether there is unappropriated

water available for the diversion requested by the project. Senior diverter demand is the volume of water legally claimed by holders of senior water rights, which is subtracted from available supply when evaluating new water right applications. The analysis accounted for the minimum instream flows for fish specified in Decision 1610, diversions by senior water rights holders, and an additional operational buffer. Decision 1610 is a water ruling by the State Water Resources Control Board that establishes minimum instream flow requirements and water diversion conditions for the Russian River system.

The analysis showed that full yield (200 acre-feet) would not be available in 42 percent of years. However, there is an estimated 89 percent probability that the maximum annual volume that would be injected as part of the ASR pilot test (118 acre-feet) would be available for diversion in any given year. Therefore, except under exceptional drought conditions, sufficient water supply is anticipated.

This IS/MND incorporates by reference the Town's previously adopted Notice of Exemption for the Los Amigos ASR Pilot Test Project (SCH #2025011074), issued on January 29, 2025, and filed with both the Sonoma County Clerk's Office and the State Clearinghouse. That review concluded that the ASR pilot test qualified for a Categorical Exemption under CEQA Guidelines Sections 15303 (New Construction), 15304 (Minor Alterations to Land), and 15306 (Information Collection). No significant environmental effects were identified, and none of the exceptions under Section 15300.2 were found to apply. Additional details regarding the ASR pilot test, including an evaluation for potential cumulative impacts in conjunction with the proposed project, are included in Section 3.21 of this IS/MND.

## **1.5 Compliance with Water Right Permit Diversion Conditions**

The project will comply with diversion conditions established by the California Department of Fish and Wildlife (CDFW) in a letter dated June 27, 2025 (CDFW 2025). The conditions would ensure that water would be diverted only when unappropriated flows are available and instream flow thresholds are met. The project's Mitigation Monitoring and Reporting Program will include these conditions to ensure implementation.

### **Implementation of Water Right Permit Diversion Conditions**

To ensure that the proposed diversion of water from the Russian River does not adversely affect instream flows, aquatic habitat, or downstream water users, the Town shall comply with the following water right permit conditions recommended by the CDFW (CDFW 2025).

Specifically, the Town shall only divert water when both of the following conditions are met:

- i. On each diversion day, the flow measured at United States Geological Survey (USGS) gage 11464000 (Russian River Near Healdsburg, CA) is greater than, on a monthly basis, the sum of:
  - a. The senior demand downstream of USGS gage 11464000;
  - b. The normal condition minimum flow requirement for the upper reach of the Russian River established in Decision 1610, or any future modifications made to the minimum flow requirements as represented in Sonoma Water Permits 12947A, 12949, 12950 and 16596; and
  - c. A buffer flow of 20 cubic feet per second (cfs). This requirement is intended to account for the transit time of releases made from Lake Mendocino and Lake Sonoma pursuant to Decision 1610, and is determined considering, in part, the Project's location and season of diversion; and
  - d. When state-filed application A021182 is assigned, either in whole or in part, the quantity assigned will be included in the senior demand effective immediately.

The monthly flow requirement is a dynamic value calculated based on Condition i (a-d). The table below presents the monthly flow requirement as of the date of this IS/MND.

***Monthly Flow Requirements for Condition i***

Month	Minimum Flow Requirements (cfs)
December	229
January	227
February	228
March	369
April	483

- ii: On each diversion day, the flow measured at USGS gage 11467000 (Russian River Near Guerneville, CA) is greater than, on a monthly basis, the sum of:
- The senior demand downstream of USGS gage 11467000;
  - The normal condition minimum flow requirement for the lower reach of the Russian River established in Decision 1610, or any future modifications made to the minimum flow requirements as represented in Sonoma Water Permits 12947A, 12949, 12950 and 16596;
  - A buffer flow of 20 cfs. This requirement is intended to account for the transit time of releases made from Lake Mendocino and Lake Sonoma pursuant to Decision 1610, and is determined considering, in part, the project's location and season of diversion; and
  - When state-filed application A021182 is assigned, either in whole or in part, the quantity assigned will be included in the senior demand effective immediately.

The monthly flow requirement is a dynamic value calculated based on Condition ii (a-d). The table below presents this monthly flow requirement as of the date of IS/MND:

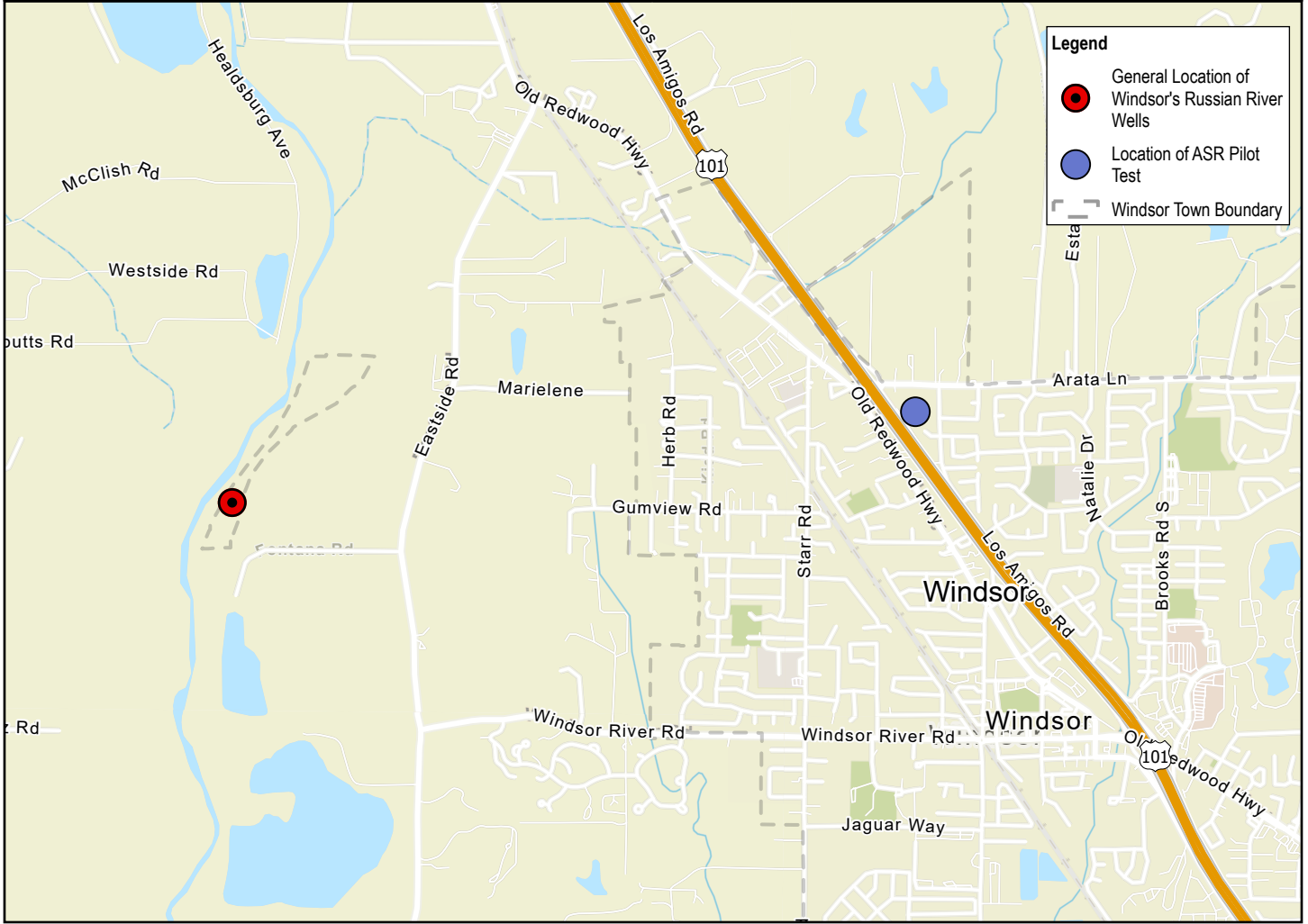
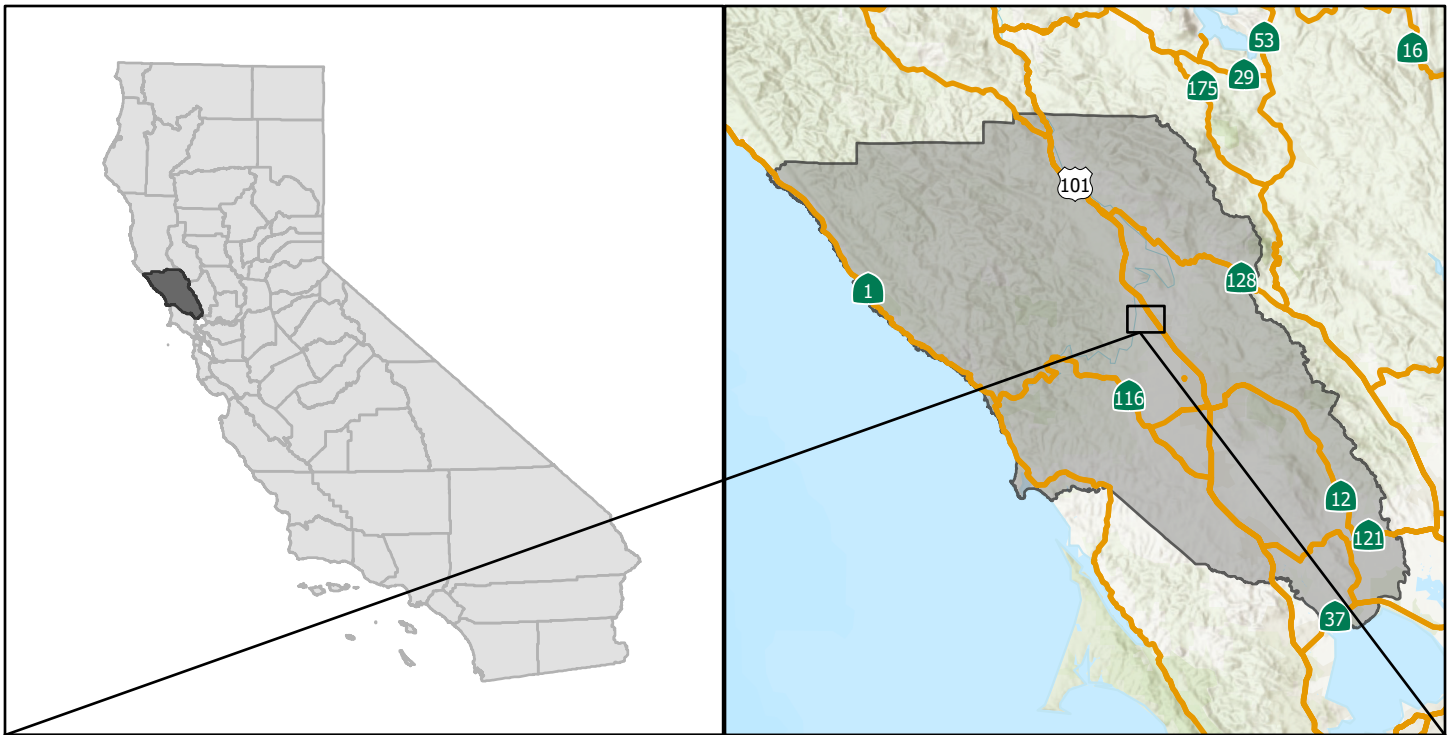
***Monthly Flow Requirements for Condition ii***

Month	Minimum Flow Requirements (cfs)
December	149
January	149
February	150
March	150
April	153

## 1.6 Required Agency Approvals

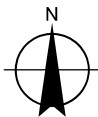
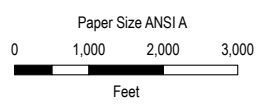
Windsor's Town Council would be requested to adopt the IS/MND and then approve proceeding with the proposed application for a 5-Year Temporary Water Rights Permit. . The agencies listed below will be Responsible Agencies or Trustee Agencies under CEQA and may need to issue approval for the project and, thus, may need to rely upon this IS/MND.

- State Water Resources Control Board Division of Water Rights
- California Department of Fish and Wildlife
- North Coast Regional Water Quality Control Board



**Legend**

- General Location of Windsor's Russian River Wells
- Location of ASR Pilot Test
- Windsor Town Boundary



**Town of Windsor  
Application for 5-Year  
Temporary Water Rights Permit**

Project No. 12638468  
Revision No. -  
Date Apr 2026

Map Projection: Lambert Conformal Conic  
Horizontal Datum: North American 1983  
Grid: NAD 1983 StatePlane California 1 FIPS 0401 Feet

**Vicinity Map**

**FIGURE 1**

\\ghdnet\ghd\US\Azure\EastUS\12638468\GIS\Maps\Working\12638468\_Windows\_Wells\12638468\_Windows\_Wells.aprx - 12638468\_001\_VicinityMap\_letter  
Print date: 02 Apr 2026 - 10:20

Data source: World Street Map; Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community; World Topographic Map - No Labels; Reference - Full; World Hillshade; Esri, CGIAR, USGS. Created by: ethompson3

## 2. Environmental Factors Potentially Affected

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

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

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION would be prepared.
- I find that although the proposed project could have a significant effect on the environment, there would not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION would be prepared.
- I find that the proposed MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect: (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect: (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Elizabeth A. Conway  
Signature

April 2, 2026  
Date

### 3. Environmental Analysis

#### 3.1 Aesthetics

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				✓
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surroundings? (Public Views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				✓
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				✓

**a-d) No Impact**

The proposed diversion of water under the 5-year temporary water rights permit would not involve ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure and does not include earthwork, grading, physical alterations, or new lighting.

The Russian River is not designated as part of the National Wild and Scenic Rivers System. Therefore, the project would not affect a river subject to the National Wild and Scenic Rivers Act (16 USC 1271) or the California Wild and Scenic Rivers Act (Public Resources Code Section 5093.50 et seq.).

The temporary diversion of water via the Town’s existing wells would not obstruct views of major peaks or scenic vistas, nor would it include physical alterations within or adjacent to an officially designated state scenic highways (Caltrans 2025). Additionally, the project would not introduce new sources of light or glare that could adversely affect day or nighttime views. The project would not result in a substantial adverse effect on scenic vistas, scenic highways, or the visual character of the area, and would not create a new source of light or glare. No impact would result.

### 3.2 Agriculture and Forest Resources

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

**a-e) No Impact**

The proposed diversion of water under the 5-year temporary water rights permit would not involve ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure and does not include earthwork, grading, or physical alterations.

The project would not affect agricultural lands, forest lands, or timberland resources (CDC 2025). No land conversion, zoning changes, or new development is proposed. Therefore, the project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. It would not conflict with existing agricultural zoning or Williamson Act contracts, nor would it disrupt ongoing agricultural operations or timber harvesting activities. The project would not involve the rezoning of forest land or timberland, nor would it result in the loss or conversion of forest land to non-forest use. Additionally, it would not cause changes in the existing environment that could lead to the conversion of farmland or forest land to other uses. No impact would result.

### 3.3 Air Quality

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

#### a-d) Less than Significant Impact

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure and would not include earthwork, grading, or any physical alteration of the site.

The Town’s Russian River wells are located within the jurisdiction of the Northern Sonoma County Air Pollution Control District (NSCAPCD), which is designated as “attainment” or “unclassified” for all federal and state ambient air quality standards.

The existing infrastructure that would convey water to an ASR pilot test site is located within both the NSCAPCD and the Bay Area Air Quality Management District (BAAQMD). According to California standards, the San Francisco Bay Area Air Basin is currently designated as nonattainment for particulate matter less than 2.5 microns in diameter (PM2.5), particulate matter less than 10 microns in diameter (PM10), and ozone. Under national standards, the basin is designated as nonattainment for PM2.5 and 8-hour ozone.

The applicable air quality plan for the San Francisco Bay Area Air Basin is BAAQMD’s 2017 Clean Air Plan (BAAQMD 2017). This plan includes 85 control measures across nine economic sectors. The measures are implemented by BAAQMD, the California Air Resources Board (CARB), or local jurisdictions, and are not directly applicable to individual development projects. The proposed project would not conflict with or impede implementation of the Clean Air Plan, and none of its measures apply directly to the project.

Project energy consumption would be limited to the electricity needed to operate the wells, conveyance, treatment and injection. The estimated electricity required to pump 200 acre-feet of water into the Town’s distribution system is approximately 86,000 kilowatt-hours (kWh). The periodic operation of the wells would not introduce new combustion sources or industrial processes, nor would it result in a substantial increase in air quality emissions. The diversion project does not involve construction and does not increase traffic. Because it relies entirely on existing infrastructure and does not introduce new combustion sources or industrial processes, it would not contribute to criteria air pollutants or violate air quality standards.

The project would not conflict with or obstruct implementation of applicable air quality plans, nor would it violate air quality standards or contribute substantially to an existing or projected air quality violation. The project would not result in a cumulatively considerable net increase of criteria pollutants, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors affecting a substantial number of people. The impact would be less than significant.

### 3.4 Biological Resources

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

**a, b, c, d, e) Less than Significant Impact**

The proposed project involves the diversion of up to 200 acre-feet of water annually from the Russian River under a 5-year temporary water rights permit. Water would be diverted at a rate of up to 1 cfs between December 1 and April 30 using existing Russian River wells. The diverted water would be stored in the shallow aquifers underlying the Town at an ASR pilot test site located approximately 1.7 miles east of the river. The aquifer at the ASR pilot test site is hydrologically distinct from the Russian River and is not considered underflow.

Several fish species that inhabit the Russian River are recognized as sensitive or protected under state and federal regulations. These include coho salmon (*Oncorhynchus kisutch*), listed as both Federally Threatened (FT) and State Threatened (ST); steelhead (*Oncorhynchus mykiss irideus*, *Central California Coast DPS*), listed as FT and a State Species of Special Concern (SSC); and Russian River tule perch (*Hysteroecarpus traskii pomo*), designated as a SSC. These species rely on adequate instream flows for critical life stages such as spawning, rearing, and migration.

The Russian River is also a navigable waterbody and is considered waters of the United States under the Clean Water Act and a water of the State under the Porter-Cologne Water Quality Control Act. The project

would rely exclusively on existing wells and infrastructure and does not include earthwork, grading, or physical disturbance of the Russian River. Although the river is not directly listed as a sensitive natural community by CDFW, riparian habitats and aquatic ecosystems associated with the river may qualify as sensitive natural communities depending on their rarity and condition.

Additionally, the Sonoma County General Plan includes goals, objectives, and policies that protect biotic habitat areas and water resources. Goal OSRC-7 includes objectives and policies for protecting and enhancing the County's natural habitats and diverse plant and animal communities, while Goal OSRC-8 includes objectives and policies for protecting riparian corridors, including along the Russian River. Goal WR-1 includes objectives and policies to protect the quality of surface and groundwater resources to meet the needs of all reasonable beneficial uses, while Goal WR-3 includes objectives and policies to ensure public water systems provide a long-term, reliable supply that aligns with local plans, protects other water users, and safeguards the natural environment.

To evaluate water availability and ensure protection of instream resources, the State Water Resources Control Board, Division of Water Rights – North Coast Instream Flow Unit conducted a watershed-level analysis (SWRCB 2025). This assessment accounted for minimum instream flow requirements for fish habitat as specified in Decision 1610, senior water rights diversions, and an operational buffer to ensure flow reliability. Decision 1610 is a water ruling by the State Water Resources Control Board that establishes minimum instream flow requirements and water diversion conditions for the Russian River system. The analysis confirmed that unappropriated water is available for diversion under specific flow conditions.

Although the project does not involve physical disturbance, the act of diverting water from the Russian River has the potential to affect instream flows and downstream water users if not properly managed.

Uncontrolled diversions could reduce flows necessary to support special-status species, sensitive natural communities, jurisdictional aquatic habitat, and migratory fish, which would also conflict with regulations protecting biological resources. As outlined in Section 1.5 of this IS/MND, the project would implement conditions required as part of the proposed 5-year temporary diversion permit. The conditions were established by the CDFW and would ensure that water would be diverted only when unappropriated flows are available and instream flow thresholds are met. With these conditions in place, the proposed diversion would represent approximately 0.2 to 0.4 percent of total river flow during permitted diversion periods. Given the temporary nature, the small scale of the proposed diversion, the diversion restriction to high-flow periods, and the absence of physical alteration to the riverbed or banks, the project would not result in a substantial reduction in the natural flow of the Russian River. With implementation of these conditions, potential impacts to special-status aquatic species, sensitive natural communities, jurisdictional waters, and migratory fish would be less than significant. In addition, the project would not be inconsistent with regulations that protect biological resources, including relevant provisions of the Sonoma County General Plan (Sonoma County, 2008).

#### **f) No Impact**

Habitat Conservation Plans and Natural Community Conservation Plans are geographic-specific plans to address effects on sensitive species of plants and animals. There are no adopted Habitat Conservation Plans or Natural Community Conservation Plans that include the project area. Therefore, the project would not conflict with any such plan, and no impact would result.

### 3.5 Cultural Resources

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

#### a-c) Less than Significant Impact

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure and would not include earthwork, grading, or physical alteration of the site. As the project would not involve ground disturbance or activities with the potential to uncover or damage historical resources, archaeological resources, or human remains, the impact is anticipated to be less than significant.

### 3.6 Energy Resources

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

#### a-b) Less than Significant Impact

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure and does not include earthwork, grading, or physical alteration of the site.

Because no physical modifications would occur, the project would not result in substantial construction-related energy use. Energy consumption would be limited to the electricity required to operate the Town’s existing wells for additional pumping, conveyance and treatment. The estimated electricity required to pump 200 acre-feet of water into the Town’s distribution system is approximately 86,000 kWh, or 0.06 percent of the total electricity consumed in Windsor in 2024 as reported by the Pacific Gas and Electric Company (PG&E). The periodic and temporary increased usage would not be substantial. The impact would be less than significant.

### 3.7 Geology and Soils

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

#### a-f) No Impact

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The project would rely entirely on existing wells and infrastructure and would not include earthwork, grading, or physical alteration of the site.

Because the diversion project uses existing facilities and does not involve ground disturbance or construction of new facilities, it would not affect soil stability, contribute to erosion or landslides, or expose people to seismic hazards. The project would not result in substantial adverse effects related to seismic activity, soil erosion, or unstable geologic or soil conditions. It does not involve the use of septic tanks or alternative wastewater disposal systems and would not disturb geologic formations that could contain paleontological resources. No impact would result.

### 3.8 Greenhouse Gas Emissions

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

#### a-b) Less than Significant Impact

The Town of Windsor’s Municipal Climate Action Plan (Windsor 2024), Climate Resilience Plan (Windsor 2022), and 2040 General Plan (Windsor 2023) all support reducing greenhouse gas (GHG) emissions. The Municipal Climate Action Plan sets a goal of net-zero emissions from municipal operations by 2030. The Climate Resilience Plan focuses on preparing for climate risks like drought and wildfire while supporting low-emission strategies. The 2040 General Plan includes policies that promote sustainable land use, transportation, and resource management to help meet the Town’s climate goals. Additionally, the California Air Resources Board’s 2022 Climate Change Scoping Plan outlines statewide strategies for achieving carbon neutrality by 2045 (CARB 2022).

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure and does not include earthwork, grading, or physical alteration of the site.

The diversion project would not involve new construction or equipment installation, and only minor operational changes powered by electricity. According to the Sonoma County Regional Climate Protection Authority’s 2022 Update to the Sonoma County Greenhouse Gas Inventory (SCRCPA 2024), water distribution and conveyance account for less than 0.3 percent of the Town’s total GHG emissions, indicating that water-related facilities represent a small portion of the Town’s overall emissions footprint.

Energy consumption would be limited to the electricity required to operate the Town’s existing wells for additional pumping, conveyance and treatment. The estimated amount of electricity required to pump 200 acre-feet of water into the Town’s water distribution system is approximately 86,000 kWh, or 0.06 percent of the total electricity consumed in Windsor in 2024 as reported by PG&E. GHG emissions from the periodic and temporary increased usage would not be substantial.

The project would not generate GHG emissions that would have a significant impact on the environment, nor would it conflict with applicable plans, policies, or regulations adopted for the purpose of reducing or mitigating GHG emissions. The CARB Climate Change Scoping Plan measures are broad policy and regulatory initiatives implemented at the State level and do not apply directly to individual projects. The proposed project would not interfere with the State’s ability to implement the GHG reduction strategies identified in the Scoping Plan.

The project impact would be less than significant.

### 3.9 Hazards and Hazardous Materials

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

#### a-g) No Impact

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure and does not include earthwork, grading, or physical alteration of the site.

The project does not involve the use, storage, or transport of hazardous materials, and no new facilities or operations are proposed that would increase the risk of accidental release or exposure. The project site is not near schools or other sensitive receptors. The Town's Russian River wells are not on or adjacent to any parcels listed pursuant to Government Code Section 65962.5 (CalEPA 2025), nor are they within two miles of the Sonoma County Airport or within an area governed by an Airport Land Use Plan.

As noted in Section 3.20 (Wildfire), the Russian River wells are not within or adjacent to State Responsibility Area (SRA) lands or designated Very High Fire Hazard Severity Zones (VHFHSZ). Instead, they are situated within a Local Responsibility Area (LRA) classified as a moderate fire hazard severity zone. The project would not impair emergency response or evacuation plans, exacerbate wildfire risks, affect vegetation, or expose people or structures to wildfire-related hazards.

The project would not involve the routine transport, use, or disposal of hazardous materials, nor would it create a significant risk of accidental release. The project site is not located near a school, airport, or hazardous materials site, and would not impair or interfere with the implementation of an adopted emergency response or evacuation plan. No impact would result.

### 3.10 Hydrology and Water Quality

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

#### a-e) Less than Significant Impact

The Town of Windsor's well field is located within the Russian River Hydrologic Unit, Middle Russian River Hydrologic Area, and Mark West Hydrologic Subarea. While certain tributaries within the Mark West Hydrologic Subarea are listed for specific constituents, the Russian River mainstem itself is not identified as an impaired waterbody under the current 303(d) listing cycle.

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure and does not include earthwork, grading, or physical alteration of the site.

To evaluate water availability and ensure protection of instream resources, the State Water Resources Control Board, Division of Water Rights – North Coast Instream Flow Unit conducted a watershed-level analysis (SWRCB 2025). This assessment accounted for minimum instream flow requirements for fish habitat as specified in Decision 1610, senior water rights diversions, and an operational buffer to ensure flow reliability. Decision 1610 is a water ruling by the State Water Resources Control Board that establishes

minimum instream flow requirements and water diversion conditions for the Russian River system. The analysis confirmed that unappropriated water is available for diversion under specific flow conditions.

Although the project does not involve physical disturbance, diverting water from the Russian River has the potential to affect instream flows and downstream water users if not properly managed. Uncontrolled diversions could result in violations of water quality standards, waste discharge requirements, decreases in groundwater supplies, and conflicts with water quality control plans.

With implementation and compliance with diversion conditions established by CDFW outlined in Section 1.5 of this IS/MND, the proposed diversion would represent approximately 0.2 to 0.4 percent of total river flow during permitted diversion periods. Water diversion under the permit would occur only when specific flow conditions are met. On each diversion day, flows measured at United States Geological Survey (USGS) gages 11464000 (Russian River near Healdsburg) and 11467000 (Russian River near Guerneville) must exceed the applicable minimum flow requirements, include a buffer of 20 cfs to account for release transit time, and incorporate any quantity assigned under state-filed application A021182. These thresholds are consistent with the requirements of State Water Resources Control Board Decision 1610 (D-1610), which are intended to protect aquatic habitat in the Russian River.

Because the diversion project uses existing facilities and does not involve ground disturbance or new improvements, it would not directly affect soil stability, contribute to erosion, increase runoff, or cause inundation. With implementation and compliance with diversion conditions established by CDFW, the project would not violate any water quality standards or waste discharge requirements, nor would it alter existing drainage patterns or result in increased erosion or runoff. It does not involve construction in or near a waterway, nor does it include activities that would degrade surface or groundwater quality. Although the project includes use of existing municipal supply wells located within the designated floodway of the Russian River, it does not involve any modifications to the well infrastructure and would not impede or redirect flood flows. No impact would result.

Given the temporary nature, the small scale of the proposed diversion, the diversion restriction to high-flow periods, and the absence of physical alteration to the riverbed or banks, the project would not result in a substantial reduction in the natural flow of the Russian River. In addition, the project would not conflict with water quality standards, waste discharge requirements, result in decreases in groundwater supplies, or conflict with water quality control plans. The impact would be less than significant.

### 3.11 Land Use and Planning

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

#### a-b) No Impact

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure, and does not include earthwork, grading, or physical alteration of the site.

The diversion project does not involve new construction and would not physically divide an established community. It aligns with the existing use of the Town’s Russian River wells, and water diversion under the permit would occur only when flow conditions are met that protect water rights and instream flow requirements for the Russian River system. The project would not conflict with any applicable land use plans, policies, or regulations adopted to avoid or mitigate environmental impacts. Therefore, no impact would result.

### 3.12 Mineral Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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?				✓
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?				✓

#### a, b) No Impact

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The diversion project would rely exclusively on existing wells and infrastructure, and does not include earthwork, grading, or physical alteration of the site. The proposed water extraction from existing wells would not interfere with designated mineral resource zones in the Russian River that support the extraction of construction-grade aggregate and alluvial materials. Therefore, the project would not result in the loss of availability of any known mineral resources. No impact would result.

### 3.13 Noise

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

#### a-b) Less than Significant Impact

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The diversion project would rely exclusively on existing wells and infrastructure and would not include earthwork, grading, or physical alteration of the site.

Because the project involves the use of existing infrastructure and no construction or operational changes are proposed, no new equipment or facilities would generate noise or ground borne vibration. The additional periodic use of the existing wells would result in intermittent, localized, low-intensity noise and vibration from pump operation, but would not cause substantial temporary or permanent increases in ambient noise levels. The project would not expose people to noise from transportation or construction sources. The impact would be less than significant.

#### c) No Impact

The Town’s Russian River wells are not located near a private airstrip, within two miles of the Sonoma County Airport, or within an area governed by an Airport Land Use Plan. No impact would result.

### 3.14 Population and Housing

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

#### a-b) No Impact

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure and does not include earthwork, grading, or physical alteration of the site.

The project does not involve residential development, relocation, or changes to land use designations. It would not induce population growth or displace existing housing or residents. The project does not include the construction of new homes or businesses, nor does it extend roads or other infrastructure into undeveloped areas. Operation and maintenance would be conducted by existing Town of Windsor staff. No impact would result.

### 3.15 Public Services

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

**a) No Impact**

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure and does not include earthwork, grading, or physical alteration of the site.

The project would not require new or expanded public services, such as fire protection, police, schools, or parks. It would not induce population growth or increase demand on existing service infrastructure. No impact would result.

### 3.16 Recreation

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

#### a-b) No Impact

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure, and does not include earthwork, grading, or physical alteration of the site.

The project would not affect recreational facilities or access to open space, including the Russian River, and no construction or land use changes would occur that would increase demand for recreational services or degrade recreational resources. The project would not increase the use of existing recreational facilities in a way that causes physical deterioration, nor require the construction or expansion of recreational facilities that could result in significant environmental impacts. No impact would result.

### 3.17 Transportation

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

#### a-d) No Impact

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure and does not include earthwork, grading, or physical alteration of the site.

Because no physical modifications would occur, the project would not generate construction-related traffic or result in changes to transportation infrastructure. It would not affect roadway capacity, traffic flow, or transportation safety.

The increased operation of the Town's Russian River wells would not be substantial and would not require additional site visits to the wells by Town staff.

The project would not conflict with a transportation plan or policy, would not result in an increase in vehicle miles traveled (VMT), would not pose hazards due to design features or incompatible uses, and would not interfere with emergency access. No impact would result.

### 3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in Public Resources Code section 5020.1(k)?		✓		
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.		✓		

#### a.i, a.ii) Less than Significant Impact with Mitigation

On October 23, 2025, the Town sent tribal consultation invitation letters pursuant to Public Resources Code Section 21080.3.1 to the Federated Indians of Graton Rancheria, Lytton Rancheria, and Mishewal-Wappo. Within the 30-day response period, the Federated Indians of Graton Rancheria requested consultation. The Town of Windsor conducted a Tribal consultation meeting with the Federated Indians of Graton Rancheria on February 2, 2026, after which the Tribe requested additional project information that was subsequently provided by the Town.

As part of the environmental review, a search of the Native American Heritage Commission Sacred Lands File was conducted for the project area, and the results were positive. A cultural resources records search conducted by the Northwest Information Center (NWIC) did not identify any recorded archaeological resources within the project area, however, the results note that due to the project’s proximity to the Russian River, there is a high potential for unrecorded Native American resources in the vicinity. The NWIC noted that because the proposed diversion under the 5-year temporary water rights permit would not involve ground disturbance, excavation, or construction activities and would rely entirely on existing wells and infrastructure, no additional cultural resources study is recommended. The NWIC also recommended contacting local Native American tribes, which the Town completed as part of the AB 52 consultation process.

The proposed diversion under the 5-year temporary water rights permit would not involve ground disturbance, excavation, or construction activities and would rely entirely on existing wells and infrastructure, with no grading, earthwork, or physical alterations. However, during the AB 52 consultation process, the Federated Indians of Graton Rancheria expressed concern that impacts to a Tribal Cultural

Resource could occur. Accordingly, and in consideration of the Tribe's input, the project's potential impact to Tribal Cultural Resources is conservatively considered potentially significant.

### **Mitigation**

Implementation of Mitigation Measure TCR-1 requires that, prior to implementing the proposed temporary water diversion, the Town develop, in further consultation with FIGR, a Tribal Cultural Resources Treatment Plan to protect and preserve Tribal Cultural Resources. With implementation of Mitigation Measure TCR-1, potential impacts would be less than significant.

#### **Mitigation Measure TCR 1: Protection of Tribal Cultural Resources**

Prior to implementation of the proposed temporary water diversion, the Town shall ensure that a Tribal Cultural Resources Treatment Plan is developed to address potential impacts to Tribal Cultural Resources, including culturally significant places and cultural landscapes. The Treatment Plan shall be developed in consultation with FIGR, reviewed by the Town and FIGR, and approved prior to the start of diversion activities. The Treatment Plan shall identify measures and procedures intended to protect and preserve Tribal Cultural Resources.

### 3.19 Utilities and Service Systems

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

**a, c, d, e) No Impact**

The proposed diversion of water under the 5-year temporary water rights permit would not involve ground disturbance, excavation, or construction activities. The project would rely exclusively on existing wells and infrastructure and does not include earthwork, grading, or physical alterations. The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Additionally, the project would not generate solid waste or conflict with solid waste regulations. No impact would result.

**b) Less than Significant Impact**

To evaluate water availability and ensure protection of instream resources, the State Water Resources Control Board, Division of Water Rights – North Coast Instream Flow Unit conducted a watershed-level analysis (SWRCB 2025). This assessment accounted for minimum instream flow requirements for fish habitat as specified in Decision 1610, senior water rights diversions, and an operational buffer to ensure flow reliability. Decision 1610 is a water ruling by the State Water Resources Control Board that establishes minimum instream flow requirements and water diversion conditions for the Russian River system.

The analysis confirmed that unappropriated water is available for diversion under specific flow conditions. Specifically, the analysis showed that full yield (200 acre-feet) would not be available in 42 percent of years; however, there is an estimated 89 percent probability that the maximum annual volume that would be

injected as part of the ASR pilot test (118 acre-feet) would be available for diversion in any given year. Therefore, except under exceptional drought conditions, sufficient water supply is anticipated.

With implementation and compliance with diversion conditions established by CDFW outlined in Section 1.5 of this IS/MND, the proposed diversion would represent approximately 0.2 to 0.4 percent of total river flow during permitted diversion periods. Water diversion under the permit would occur only when specific flow conditions are met. On each diversion day, flows measured at United States Geological Survey (USGS) gages 11464000 (Russian River near Healdsburg) and 11467000 (Russian River near Guerneville) must exceed the applicable minimum flow requirements, include a buffer of 20 cfs to account for release transit time, and incorporate any quantity assigned under state-filed application A021182. These thresholds are consistent with the requirements of Decision 1610, which are intended to protect aquatic habitat in the Russian River.

Given the temporary nature, the small scale of the proposed diversion, the diversion restriction to high-flow periods, and the availability of water supply, the project impact would be less than significant.

### 3.20 Wildfire

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

#### a-d) No Impact

The proposed diversion of water under the 5-year temporary water rights permit would not involve any ground disturbance, excavation, or construction activities. The diversion project would rely exclusively on existing wells and infrastructure and does not include earthwork, grading, or physical alteration of the site.

The Town’s Russian River wells are not within or adjacent to State Responsibility Area (SRA) lands or designated Very High Fire Hazard Severity Zones (VHFHSZ). Instead, they are within a Local Responsibility Area (LRA) classified as a moderate fire hazard severity zone (CAL FIRE 2025). Therefore, the wildfire section of the CEQA Guidelines Appendix G Checklist does not apply. Additionally, the project would not impair emergency response or evacuation plans, exacerbate wildfire risks, affect vegetation, or expose people or structures to wildfire-related hazards. No impact would result.

### 3.21 Mandatory Findings of Significance

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

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

Potential project impacts to biological, cultural, and tribal cultural resources are addressed in Section 3.4, Biological Resources, Section 3.5, Cultural Resources, and Section 3.18, Tribal Cultural Resources, respectively. With implementation and compliance with diversion conditions established by CDFW, as identified in Section 1.5 of this IS/MND, and implementation of Mitigation Measure TCR-1, the potential for project-related activities to degrade the quality of the environment, including wildlife species or their habitat, plant or animal communities, or tribal cultural resources, would be less than significant.

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

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

Cumulative projects identified for this IS/MND include the Town’s Los Amigos ASR Pilot Test. As described in Section 1.4 (Project Description), the Town is seeking a 5-year temporary water rights permit from the

State Water Resources Control Board to divert up to 200 acre-feet of water annually from the Russian River. The diverted water would be injected, stored underground, and later extracted as part of a previously approved ASR pilot test at 10011 Los Amigos Road. The purpose of the pilot test is to evaluate the feasibility of injecting and recovering treated potable water from two shallow aquifers to enhance long-term water supply reliability.

This IS/MND incorporates by reference the Town's previously filed Notice of Exemption for the Los Amigos ASR Pilot Test Project (SCH #2025011074), issued on January 29, 2025, and filed with both the Sonoma County Clerk's Office and the State Clearinghouse. That review determined the pilot test qualified for a Categorical Exemption under CEQA Guidelines Sections 15303 (New Construction), 15304 (Minor Alterations to Land), and 15306 (Information Collection). No significant environmental effects were identified, and none of the exceptions under Section 15300.2 were found to apply.

Further details regarding the ASR pilot test, including an evaluation for potential cumulative impacts in conjunction with the proposed project, are provided below.

### **ASR Pilot Test**

The Town's Los Amigos ASR pilot test is intended to generate operational data to inform the design of a potential long-term future ASR program using the same wells, diversions, injection and extraction rates. Key objectives include evaluating water quality, injection characteristics, and recovery efficiency. Benefits of ASR projects may include improved local and statewide water supply reliability, drought resilience, and improved delivered water quality.

ASR projects in California are regulated under the State Water Resources Control Board's General Waste Discharge Requirements (Water Quality Order 2012-0010), which apply to projects that inject drinking water treated under a California Department of Public Health domestic water supply permit. The Order supports ASR as a tool for enhancing local storage and advancing California's conjunctive use potential.

The pilot test includes drilling two ASR wells and one or more monitoring wells, installing necessary utility connections, and conducting pump tests. Injection and recovery will occur over a two-year period, with water injected during winter months and extracted later for evaluation. Water quality will meet all applicable standards, and monitoring will track groundwater levels and water quality throughout the test. Extracted water will be discharged to the sanitary sewer system, and temporary facilities will be installed for equipment housing and site security.

The proposed project and the ASR pilot test has been evaluated for potential cumulative impacts using the same impact criteria applied to the proposed project in the IS/MND.

### **Aesthetics**

As summarized in Section 3.1 of this IS/MND, the project would not result in impacts on aesthetics. The project would rely exclusively on existing wells and infrastructure and would not involve ground disturbance, excavation, earthwork, grading, or other physical alterations. No impact to scenic vistas, scenic highways, or the visual character of the area would occur, and the project would not introduce new sources of light or glare. Therefore, implementation of the project would not contribute to any related cumulative impact on those resources.

The ASR pilot test site is not located along a scenic vista or adjacent to an officially designated state scenic highway. The pilot test infrastructure is low-profile, located within an urbanized area, and would not degrade the existing visual quality of the site or its surroundings. Minimal site disturbance is expected, as

construction vehicles will access the site via an existing asphalt-paved access road. Additionally, the ASR pilot test infrastructure does not include new nighttime lighting.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts relative to aesthetics.

### **Agriculture and Forest Resources**

As summarized in Section 3.2 of this IS/MND, the project would not result in impacts on agriculture and forest resources. Therefore, implementation of the project would not contribute to any related cumulative impact on those resources.

The ASR pilot test site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation 2025). The site is not zoned for agricultural use, forest land, timberland, or Timberland Production, and is not subject to a Williamson Act contract. Additionally, no forest land or timber harvesting activities are present within or adjacent to the project area.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to agriculture and forest resources.

### **Air Quality**

As summarized in Section 3.3 of this IS/MND, the project would result in less than significant impacts on air quality.

The ASR pilot test will not conflict with or obstruct implementation of applicable air quality plans, nor would it violate air quality standards or contribute substantially to an existing or projected air quality violation. It would not result in a cumulatively considerable net increase of criteria pollutants, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors affecting a substantial number of people.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to air quality.

### **Biological Resources**

As summarized in Section 3.4 of this IS/MND, potential impacts of the proposed project on biological resources would be less than significant with implementation and compliance with diversion conditions established by CDFW identified in Section 1.5 of this IS/MND. The conditions would ensure that water would be diverted only when unappropriated flows are available and instream flow thresholds are met. Given the temporary nature, the small scale of the proposed diversion, the diversion restriction to high-flow periods, and the absence of physical alteration to the riverbed or banks, the project would not result in a substantial reduction in the natural flow of the Russian River or impacts to special-status aquatic species, sensitive natural communities, jurisdictional waters, and migratory fish. Additionally, the project would remain consistent with applicable local policies and ordinances that safeguard biological resources, including relevant provisions of the Sonoma County General Plan.

There is no designated critical habitat under the federal Endangered Species Act at the ASR pilot test site, and no special-status plant or wildlife species have been recorded at the site or in the immediate surrounding area. The pilot test will result in minimal site disturbance, as construction vehicles will access the well sites via an existing paved road. The area designated for sewer line installation consists of paved, disturbed, and mowed land.

A seasonal drainage on the pilot test site supports common plant species such as dock (*Rumex sp.*), tall flatsedge, pennyroyal (*Mentha pulegium*), annual beard grass (*Polypogon monspeliensis*), Harding grass (*Phalaris aquatica*), and water plantain (*Alisma lanceolatum*). The pilot test infrastructure avoids the drainage, and a Habitat Analysis (Todd Groundwater 2024) concluded that no significant adverse effects on the broader riparian habitat would be anticipated.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to biological resources.

## Cultural Resources

As summarized in Section 3.5 of this IS/MND, the project would result in less than significant impacts on cultural resources.

The ASR pilot test activities have previously been evaluated and determined to be categorically exempt from CEQA. These activities do not involve the removal or alteration of existing structures, and the pilot test site is not within a Town of Windsor Historic Preservation Overlay District.

A review of cultural resource records, historic maps, and literature on file at the Northwest Information Center (NWIC) confirmed that no previously recorded archaeological resource sites are present within the pilot test site. Additionally, surrounding buildings were determined ineligible for listing on the National Register of Historic Places under status code 6Y, as documented in a prior Section 106 review.

The Windsor General Plan includes policies to address potential archaeological and tribal cultural resource impacts. In accordance with General Plan Policies ER-7.2, ER-7.3 and ER-7.4, and consistent with industry-accepted BMPs, the ASR pilot test will comply with all applicable state laws if unanticipated archaeological resources are encountered during ground-disturbing activities. These laws include:

- Public Resources Code provisions related to archaeological sites and artifacts.
- Health and Safety Code provisions concerning Native American burial sites and human remains.
- The California Native American Graves Protection and Repatriation Act, which governs the treatment of human remains and cultural items.

If such resources are discovered, work would be required to stop immediately. A qualified archaeologist would evaluate the find, relevant tribal representatives would be notified, and appropriate measures would be implemented to protect the resource and prevent further impacts. Similarly, if human remains or cultural items are encountered, the County Coroner would be contacted. If the remains are determined to be Native American, the Native American Heritage Commission and Most Likely Descendant would be notified to provide recommendations and ensure respectful treatment and disposition.

Compliance would include proper notification and coordination with relevant Native American tribes and implementation of protective measures consistent with regulatory requirements.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to cultural resources.

## Energy Resources

As summarized in Section 3.6 of this IS/MND, the project would result in less than significant impacts on energy resources.

The ASR pilot test activities involve small-scale operations using minimal construction equipment and would not result in the wasteful use of fuel or energy, nor would they conflict with any applicable energy efficiency

plans. Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to energy resources.

### **Geology and Soils**

As summarized in Section 3.7 of this IS/MND, the project would not result in impacts on geology and soils. Therefore, implementation of the project would not contribute to any related cumulative impact on such resources.

The ASR pilot test site is underlain by the Glen Ellen formation and consists of alluvial surficial deposits. It is not within a designated Alquist-Priolo Earthquake Fault Zone, and no active or potentially active faults have been mapped at the site. The pilot test involves temporary activities, such as drilling and well testing, and is in an area of low relief with no slopes or natural features that would contribute to slope instability.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to geology and soils.

### **Greenhouse Gas Emissions**

As summarized in Section 3.8 of this IS/MND, the project would result in less than significant impacts on GHG emissions.

The ASR pilot test is being conducted to assess the feasibility of ASR as a method for enhancing local water storage and supporting California's conjunctive use goals. This effort aligns with the Town's Climate Resilience Plan, which includes strategies to strengthen water supply resilience and reduce drought risk. The pilot test involves small-scale activities using minimal construction equipment, and the brief construction period would not result in substantial additional GHG emissions.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to greenhouse gas emissions.

### **Hazards and Hazardous Materials**

As summarized in Section 3.9 of this IS/MND, the project would not result in impacts on hazards and hazardous materials. Therefore, implementation of the project would not contribute to any related cumulative impact.

The ASR pilot test site is not listed pursuant to Government Code Section 65962.5, is not within 0.25 miles of a school, and is not within two miles of the Sonoma County Airport or an Airport Land Use Plan area. Like the Russian River wells, the pilot test site is within an LRA designated as a moderate fire hazard severity zone. The site is flat, urbanized, and does not present conditions that would increase the risk of wildland fires. Pilot test activities would involve the use of materials such as fuels for equipment, which are commonly used during construction, are not acutely hazardous, and would be used in small quantities. These materials are subject to numerous laws and regulations that ensure their safe transportation, use, storage, and disposal.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to hazards and hazardous materials.

### **Hydrology and Water Quality**

As summarized in Section 3.10 of this IS/MND, the project would result in less than significant impacts on hydrology and water quality. To evaluate water availability and ensure protection of instream resources, the

State Water Resources Control Board, Division of Water Rights – North Coast Instream Flow Unit conducted a watershed-level analysis (SWRCB 2025). The analysis confirmed that unappropriated water is available for diversion under specific flow conditions. With implementation and compliance with diversion conditions established by CDFW identified in Section 1.5 of this IS/MND, the proposed diversion would represent approximately 0.2 to 0.4 percent of total river flow during permitted diversion periods. Water diversion under the permit would occur only when specific flow conditions are met. On each diversion day, flows measured at USGS gages 11464000 (Russian River near Healdsburg) and 11467000 (Russian River near Guerneville) must exceed the applicable minimum flow requirements, include a buffer of 20 cfs to account for release transit time, and incorporate any quantity assigned under state-filed application A021182. Given the temporary nature, the small scale of the proposed diversion, the diversion restriction to high-flow periods, and the absence of physical alteration to the riverbed or banks, the project would not result in a substantial reduction in the natural flow of the Russian River. In addition, the project would not conflict with water quality standards, waste discharge requirements, result in decreases in groundwater supplies, or conflict with water quality control plans.

The ASR pilot test site is not within a 100-year flood hazard area, floodway, or other special flood hazard zone. Prior to implementation, the Town will obtain necessary approvals for the pilot test activities from the Regional Water Quality Control Board (RWQCB) for water injection, water quality monitoring, and reporting. The pilot test wells will be constructed in accordance with California Well Standards and Sonoma County Well Standards by a licensed well driller, under the supervision of a California-registered engineer or geologist.

The ASR pilot test will comply with Water Quality Order 2012-0010, issued by the State Water Resources Control Board, which establishes General Waste Discharge Requirements for ASR projects that inject drinking water into groundwater. This order ensures compliance with environmental regulations to protect water quality and includes guidelines for monitoring and mitigating potential impacts on groundwater and the surrounding ecosystem. Given the project's temporary nature, strict environmental safeguards, and adherence to state water quality standards, it poses minimal risk to public health or the environment.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to hydrology and water quality.

### **Land Use and Planning**

As summarized in Section 3.11 of this IS/MND, the project would not result in impacts on land use and planning. Therefore, implementation of the project would not contribute to any related cumulative impacts.

The ASR pilot test infrastructure is low-profile, within an urbanized area, and does not physically divide an established community or conflict with an applicable land use plan, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to land use and planning.

### **Mineral Resources**

As summarized in Section 3.12 of this IS/MND, the project would not result in impacts on mineral resources. Therefore, implementation of the project would not contribute to any related cumulative impacts on such resources.

The ASR pilot test site is not within a designated mineral resource deposit area or within a classified Mineral Resource Zone, and no significant mineral resource deposits have been identified within the Town's General Plan area.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to mineral resources.

## **Noise**

As summarized in Section 3.13 of this IS/MND, the project impact relative to noise would be less than significant. The additional periodic use of the existing wells would result in intermittent, localized, low-intensity noise and vibration from pump operation, but would not cause substantial temporary or permanent increases in ambient noise levels.

The ASR activities will temporarily increase noise levels due to construction equipment use; however, pile driving is not required and noise would be temporary, sporadic and intermittent. The pilot test site is also not located near a private airstrip, within two miles of the Sonoma County Airport, or within an Airport Land Use Plan area.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to noise.

## **Population and Housing**

As summarized in Section 3.14 of this IS/MND, the project would not result in impacts on population and housing. Therefore, implementation of the project would not contribute to any related cumulative impacts.

The ASR pilot test activities similarly would not induce population growth, extend roads or other infrastructure into undeveloped areas, or displace existing housing or residents. Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to population and housing.

## **Public Services**

As summarized in Section 3.15 of this IS/MND, the project would not result in impacts on public services. Therefore, implementation of the project would not contribute to any related cumulative impacts.

The ASR pilot test activities similarly would not require new or expanded public services or induce population growth. Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to public services.

## **Recreation**

As summarized in Section 3.16 of this IS/MND, the project would not result in impacts on recreation. Therefore, implementation of the project would not contribute to any related cumulative impacts.

The ASR pilot test would not increase the use of existing neighborhood or regional parks and does not include the construction or expansion of recreational facilities that could result in an adverse physical effect on the environment. Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to recreation.

## Transportation

As summarized in Section 3.17 of this IS/MND, the project would not result in impacts on transportation. Therefore, implementation of the project would not contribute to any related cumulative impacts.

The ASR pilot test would not affect the Town's circulation system or alter existing roadway alignments. Operation and maintenance of the pilot test facilities would generally require one maintenance visit per day by Town staff during active testing periods, and monthly visits during inactive periods. Truck trips would be limited to a single round-trip per visit via an existing access road and would not result in incompatible uses or a significant increase in VMT. Additionally, the pilot test would not interfere with emergency access.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to transportation.

## Tribal Cultural Resources

As summarized in Section 3.18 of this IS/MND, in consideration of the input from the Federated Indians of Graton Rancheria, the project's potential impact to Tribal Cultural Resources is conservatively considered potentially significant. The impact would be reduced to less than significant with implementation of Mitigation Measure TCR-1.

The ASR pilot test activities have previously been evaluated and determined to be categorically exempt from CEQA. A review of cultural resource records, historic maps, and literature on file at the Northwest Information Center (NWIC) confirmed that no previously recorded archaeological resource sites are present within the pilot test site. In accordance with General Plan Policies ER-7.2, ER-7.3 and ER-7.4, and consistent with industry-accepted BMPs, the ASR pilot test will comply with all applicable state laws if unanticipated archaeological resources are encountered during ground-disturbing activities. These laws include:

- Public Resources Code provisions related to archaeological sites and artifacts.
- Health and Safety Code provisions concerning Native American burial sites and human remains.
- The California Native American Graves Protection and Repatriation Act, which governs the treatment of human remains and cultural items.

If such resources are discovered, work would be required to stop immediately. A qualified archaeologist would evaluate the find, relevant tribal representatives would be notified, and appropriate measures would be implemented to protect the resource and prevent further impacts. Similarly, if human remains or cultural items are encountered, the County Coroner would be contacted. If the remains are determined to be Native American, the Native American Heritage Commission and Most Likely Descendant would be notified to provide recommendations and ensure respectful treatment and disposition. Compliance would include proper notification and coordination with relevant Native American tribes and implementation of protective measures consistent with regulatory requirements.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to tribal cultural resources.

## Utilities and Service Systems

As summarized in Section 3.19 of this IS/MND, the project would not result in impacts on utilities and service systems. Therefore, implementation of the project would not contribute to any related cumulative impacts.

The ASR pilot test would connect to existing utility infrastructure. Electrical power for well pumps and associated equipment would be extended via underground conduit from existing power poles located along the west edge of the pilot test site. Potable water for injection would be supplied from the Town's existing distribution system through a connection to an existing water main located within an asphalt-paved access road. Water extracted during pilot testing would be conveyed to an existing sewer main.

Town staff have confirmed that the existing water main is adequately sized to support injection activities. To accommodate discharge flows during the ASR extraction phase, the pilot test includes construction of approximately 200 feet of enlarged sewer pipeline along the access road to connect with the main line in Los Amigos Road.

The pilot test improvements are limited in scope and duration, and would not exceed the capacity of existing water, wastewater, stormwater, or solid waste systems. The pilot test would not generate substantial amounts of solid waste or conflict with applicable waste reduction goals. Excess soil and construction materials generated during construction and operation would be disposed of in accordance with applicable regulations and would represent a small fraction of the daily permitted capacity of regional solid waste facilities.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to utilities and service systems.

### **Wildfire**

As summarized in Section 3.20 of this IS/MND, the project would not result in impacts on wildfire. Therefore, implementation of the project would not contribute to any related cumulative impacts.

Similar to the Russian River wells, the ASR pilot test site is located within an LRA designated as a moderate fire hazard severity zone. The pilot test would not impair or interfere with the implementation of emergency response or evacuation. The ASR pilot test site is flat, located in a developed area, and does not present conditions that would increase the risk of exposing occupants to pollutant concentrations from a wildfire.

Taken together, the proposed project and ASR pilot test would not result in cumulatively considerable impacts to wildfire.

### **c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly? (No Impact)**

As identified in this IS/MND, project-related activities would not result in substantial adverse effects on human beings. Therefore, no impact would result.

## 4. References

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- Sonoma County Regional Climate Protection Authority (SCRCPA). 2024. Sonoma County Greenhouse Gas Inventory: 2022 Update. July 8, 2024.
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- Todd Groundwater. 2024. Esposti Well Treatment and Los Amigos ASR Wells Projects: Potential Water Table Drawdown and Aquatic or Riparian Habitat Impacts at Nearby Creeks.
- Town of Windsor. 2022. Climate Resilience Plan. February 16, 2022.
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