

INITIAL STUDY and MITIGATED NEGATIVE DECLARATION

FOR

BI'DU KHAALE PHASE 2 HOUSING AND WELLNESS PROJECT

April 2026

Lead Agency:
City of Cloverdale



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LACO Project No. 8267.31

TABLE OF CONTENTS

I. PROJECT SUMMARY	1
II. PROJECT DESCRIPTION	7
III. PROJECT SETTING AND LOCATION	18
IV. ENVIRONMENTAL EFFECTS.....	18
V. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED.....	18
ENVIRONMENTAL IMPACT ANALYSIS:	
I. AESTHETICS	21
II. AGRICULTURE AND FORESTRY RESOURCES.....	24
III. AIR QUALITY.....	27
IV. BIOLOGICAL RESOURCES	32
V. CULTURAL RESOURCES.....	37
VI. ENERGY.....	40
VII. GEOLOGY AND SOILS	42
VIII. GREENHOUSE GAS EMISSIONS	47
IX. HAZARDS AND HAZARDOUS MATERIALS	54
X. HYDROLOGY AND WATER QUALITY.....	58
XI. LAND USE AND PLANNING	62
XII. MINERAL RESOURCES	64
XIII. NOISE	65
XIV. POPULATION AND HOUSING.....	70
XV. PUBLIC SERVICES.....	72
XVI. RECREATION	75
XVII. TRANSPORTATION.....	77
XVIII. TRIBAL CULTURAL RESOURCES.....	81
XVIX. UTILITIES AND SERVICE SYSTEMS.....	84
XX. WILDFIRE	88
XXI. MANDATORY FINDINGS OF SIGNIFICANCE	91
VI. REFERENCES.....	93

FIGURES, TABLES, AND APPENDICES

Figures

Figure 1:	Location Map	2
Figure 2:	General Plan Amendment Map.....	3
Figure 3:	Rezone Map	4
Figure 4:	Site Plan	8
Figure 5:	Tentative Parcel Map	11

Tables

Table 1:	Summary of Proposed Housing Community.....	9
Table 2:	Current and Proposed Area (in Acres) of the Site's Land Use and Zoning Designations	10
Table 3:	Required Number of On-Site Parking and Loading Spaces Required for Project	16
Table 4:	BAAQMD Air Quality Significance Thresholds.....	28
Table 5:	Project and Future Potential Development Assumptions	29
Table 6:	CalEEMod Results for Construction and Operation of the Proposed Bi'du Khaale Phase 2 Project.....	30
Table 7:	California's GHG Emissions by Economic Sector in 2022.....	48
Table 8:	1990-2018 Countywide GHG Emissions by Source and Percent Change	49
Table 9:	City of Cloverdale Inventoried and Estimated Emissions, 1990-2050	50
Table 10:	Construction, Operational, and Mobile Greenhouse Gas Emissions of the Proposed Bi'du Khaale Phase 2 Affordable Housing Project.....	51

Appendices

Appendix A:	Mitigation Monitoring and Reporting Program (MMRP)
Appendix B:	Preliminary Improvement Plans
Appendix C:	Architectural Plan Set
Appendix D:	Landscape Plans
Appendix E:	California Emissions Estimator Model (CalEEMod) Analysis Results
Appendix F:	Biological Resources Evaluation and Survey (<i>Environmental Science Associates; February 6, 2026</i>)
Appendix G:	Soils Report (<i>Reese and Associates, Inc.; July 17, 2025</i>)
Appendix H:	Phase I Environmental Site Assessment Update (<i>Environmental Science Associates; May 27, 2025</i>)
Appendix I:	Traffic Impact Study (<i>Abrams Associates; December 3, 2025</i>)

I. PROJECT SUMMARY

Date: April 2026

Project Title: Bi'du Khaale Phase 2 Housing and Wellness Project

Lead Agency: City of Cloverdale

Contact: Rafael Miranda, Associate Planner
Planning & Community Development Department
City of Cloverdale
124 N. Cloverdale Boulevard, Cloverdale, California 95425
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Location: The proposed Bi'du Khaale Phase 2 Housing and Wellness Project (Project) area is located on an approximately 16.52-acre parcel located at 27821 Dutcher Creek Road in the City of Cloverdale, California and identified as Assessor's Parcel Number (APN): 117-040-107 (Site). The Site is in northern Sonoma County, within and along the southern boundary of the City of Cloverdale. The parcel is bounded by Kelly Road and a warehouse to the northwest, Dutcher Creek Road and Highway 101 to the northeast, and vacant properties and light industrial uses to the southeast. The subject Site is located adjacent to Phase 1 of the Bi'du Khaale Housing Project, located southwest of the Site across Nopo Way.

The total disturbed area is approximately 4 acres and includes a 3.32-acre portion of the Site (proposed Lot 1), in addition to utility connection and staging areas (Development Area; see Figure 1).

Coastal Zone: No

Affected Parcel(s): Assessor's Parcel Number (APN): 117-040-107

City of Cloverdale Land Use and Zoning Designations (see Figures 2 and 3)

Current Land Use	Current Zoning	Proposed Land Use	Proposed Zoning
General Industrial (GI)	General Industrial (M-1)	General Commercial (GC)	General Commercial (G-C)

Anticipated Permits and Approvals:

The following permits and approvals are anticipated under the proposed Project:

City of Cloverdale

- 1) Adoption of Mitigated Negative Declaration
- 2) Approval of:
 - a. General Plan Amendment
 - b. Zoning Reclassification
 - c. Minor Subdivision
 - d. Conditional Use Permit
 - e. Design Review
- 3) Issuance of Building Permit

Figure 1. Location Map

	PROJECT	Bi'du Khaale Phase 2 Housing and Wellness Project	BY	MCH	FIGURE
	CLIENT	Dry Creek Rancheria Band of Pomo Indians	CHECK	MMM	1
	LOCATION	Dutcher Creek/Kelly Rd, Cloverdale, CA 95425	DATE	2/3/2026	JOB NO.
	Location Map				8267.31

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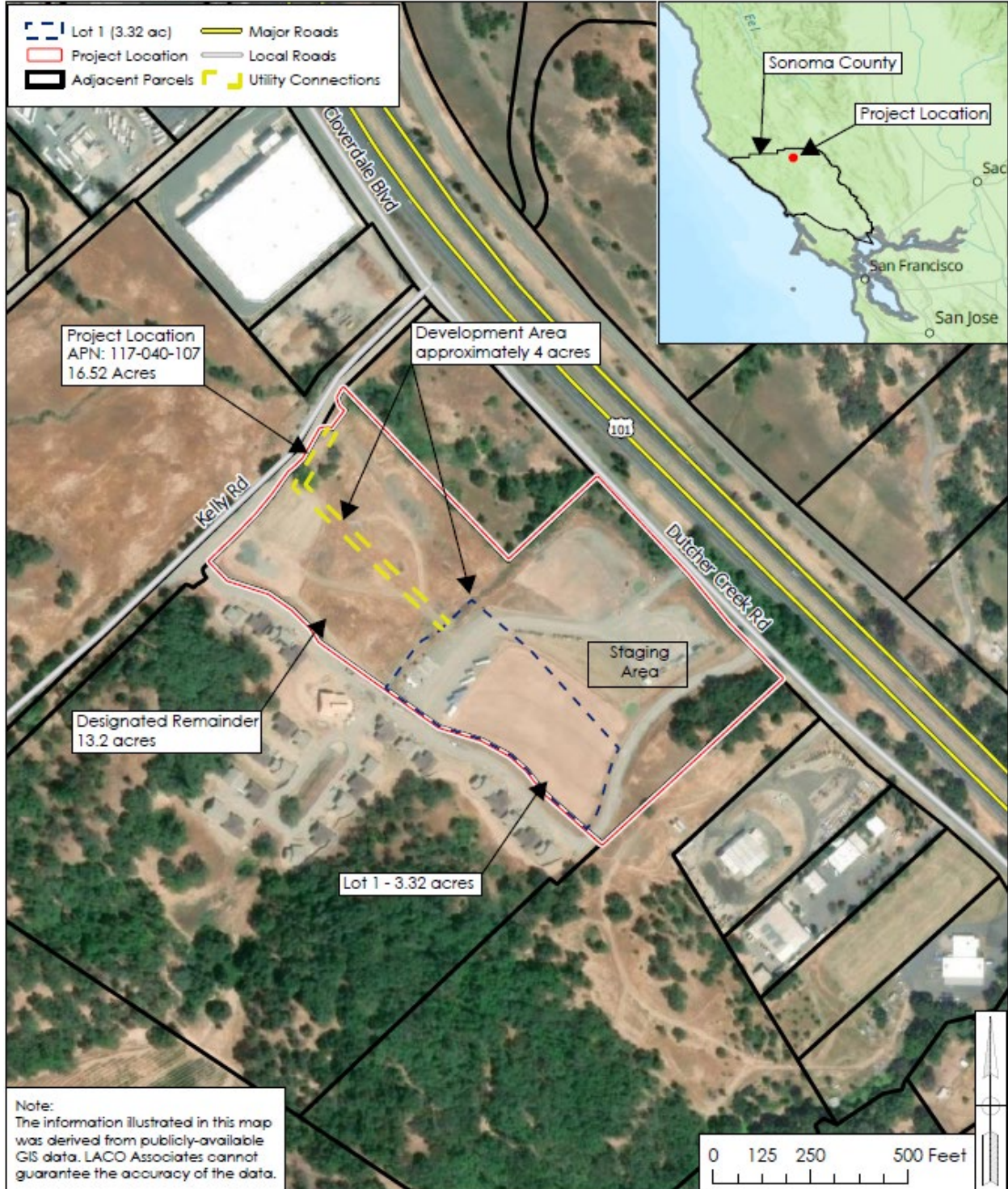


Figure 2. General Plan Amendment Map

	PROJECT	Bi'du Khaale Phase 2 Housing and Wellness Project	BY	MCH	FIGURE	
	CLIENT	Dry Creek Rancheria Band of Pomo Indians	CHECK	MMM		2
	LOCATION	Dutcher Creek/Kelly Rd, Cloverdale, CA 95425	DATE	1/29/2026	JOB NO.	
	General Plan Amendment Map					8267.31

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Existing Land Use Designations

Proposed Land Use Designations

Land Use Designations:

- (BP) Business Park
- (CF) Conservation Features
- (DSC) Destination Commercial
- (GC) General Commercial
- (GI) General Industry
- (HDR) High Density Residential
- (LDR) Low Density Residential
- (MDR) Medium Density Residential
- (SC) Service Commercial

- Project Site
- Adjacent Parcels
- Major Roads
- Local Roads

Existing LU:	Acres:	Proposed LU:	Acres:
G-I	8.43	G-I	5.5
G-C	8.07	G-C	11
Total:	16.5	Total:	16.5

Note:
The information illustrated in this map was derived from publicly-available GIS data. LACO Associates cannot guarantee the accuracy of the data.

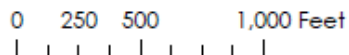



Figure 3. Rezone Map

	PROJECT	Bi'du Khaale Phase 2 Housing and Wellness Project	BY	MCH	FIGURE	
	CLIENT	Dry Creek Rancheria Band of Pomo Indians	CHECK	MMM		3
	LOCATION	Dutcher Creek/Kelly Rd, Cloverdale, CA 95425	DATE	1/29/2026	JOB NO.	
	Rezone Map					8267.31

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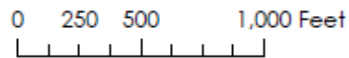


Existing Zoning Designations

Proposed Zoning Designations

- Zoning Designations:
- (G-C) General Commercial
 - (M-1) General Industrial
 - (M-P) Industrial Park
 - (P-D) Planned Unit
 - (R-1) Single-Family Residential
 - (R-2) Two-Family Residential
 - (S-C) Service Commercial
 - (S-P) Specific Plan
- Project Site
 - Adjacent Parcels
 - Major Roads
 - Local Roads

Note:
The information illustrated in this map was derived from publicly-available GIS data. LACO Associates cannot guarantee the accuracy of the data.



Other Regulatory Agencies

The following permits from State and federal agencies may also be required for the Project:

- California Department of Fish and Wildlife (CDFW): Lake or Streambed Alteration Agreement (“1600 permit” or “LSAA”)
- North Coast Regional Water Quality Control Board (NCRWQCB): Water Quality Certification 401 Permit
 - or EPA Water Quality Certification should the State Water Quality Control Board not take jurisdiction.
- State Water Resources Control Board: Construction General Permit (CGP)

Tribal Cultural Resources: Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?:

On December 9, 2025, the City of Cloverdale (City) contacted the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and the contact information for the representatives of the local Native American tribes associated with the Project area. A response was received from the NAHC on the same day. The NAHC response letter, dated December 9, 2025, indicated that a search of the SLF returned a positive result (indicating the presence of sacred sites, graves, cemeteries, and/or places of religious or social significance recorded in the NAHC database) with connections to the Mishewal-Wappo Tribe of Alexander Valley within the general vicinity of the Project, and included a contact list for 24 Native American tribes with cultural affiliations to the area. The list received from the NAHC included the contact information for representatives of the following Native American tribes: Big Valley Band of Pomo Indians of the Big Valley Rancheria, Cahto Tribe, Cloverdale Rancheria of Pomo Indians, Coyote Valley Band of Pomo Indians, Dry Creek Rancheria of Pomo Indians (Project Applicant), Elem Indian Colony Pomo Indians, Estom Yumeka Maidu Tribe of the Enterprise Rancheria, Federated Indians of Graton Rancheria, Guidiville Rancheria of California, Hopland Band of Pomo Indians, Kashia Band of Pomo Indians of the Stewarts Point Rancheria, Koi Nation of Northern California, Lytton Rancheria, Manchester Band of Pomo Indians of the Manchester Rancheria, Middletown Rancheria of Pomo Indians of California, Mishewal-Wappo Tribe of Alexander Valley, Noyo River Indian Community, Pinoleville Pomo Nation, Potter Valley Tribe, Redwood Valley or Little River Band of Pomo Indians, Robinson Rancheria of Pomo Indians, Round Valley Reservation/Covelo Indian Community, Scotts Valley Band of Pomo, and Yokayo Tribe.

In compliance with Senate Bill (SB) 18, pursuant to Government Code 65352.3, and Assembly Bill (AB) 52, pursuant to Public Resources Code (PRC) Section 21080.3.1, the City of Cloverdale (City) sent a consultation letter to each of the Native American contacts provided in the NAHC response letter (except for Dry Creek Rancheria, which is the Project Applicant) on December 11, December 15, December 16, and December 29, 2025, and January 5, January 6, January 8, and January 12, 2026. The letter included a brief description of the Project, summary of the SLF search results, and requested a response within 90 days if additional information was requested about the Project and/or to consult with the City. As of the date of this Initial Study, only one response was received from a representative of the Noyo River Indian Community, where it was indicated they have no input on the Project and are a Mendocino County Coastal Tribe. To date, no other responses have been received.

CEQA Requirement:

The proposed Project is subject to the requirements of the California Environmental Quality Act (CEQA). The Lead Agency is the City of Cloverdale. The purpose of this Initial Study (IS) is to provide a basis for determining

whether to prepare an Environmental Impact Report (EIR) or a Negative Declaration. This IS is intended to satisfy the requirements of the CEQA (Public Resources Code, Div. 13, Sec. 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Sec 15000-15387).

CEQA encourages lead agencies and applicants to modify their projects to avoid significant adverse impacts (CEQA Section 20180(c) (2) and State CEQA Guidelines Section 15070(b) (2)).

Section 15063(d) of the State CEQA Guidelines states that an IS shall contain the following information in brief form:

- 1) A description of the project including the project location;
- 2) Identification of the environmental setting;
- 3) 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 provide evidence to support the entries;
- 4) Discussion of means to mitigate significant effects identified, if any;
- 5) Examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and
- 6) The name of the person or persons who prepared and/or participated in the Initial Study.

II. PROJECT DESCRIPTION

Project Background

On September 7, 2021, the Cloverdale Planning Commission approved the Bi'du Khaale Housing Project Phase 1 and adopted a Negative Declaration. The City Council subsequently approved the project on October 27, 2021. Phase 1 included construction of 24 housing units for Tribal elders and a community center on Assessor's Parcel Number (APN): 117-040-106 (formerly APN: 117-040-073), along with associated improvements, including construction of a paved access road (Road A) on APN: 117-040-107 (formerly APN: 117-040-074). Phase 1 construction began in late 2022 and is now substantially complete, with temporary occupancy currently in place. As such, DCR is beginning to pursue the Bi'du Khaale Phase 2 Housing and Wellness Project (Project), as described below.

Project Overview

Dry Creek Rancheria (DCR, or the "Applicant") proposes to develop an all-electric 53-unit affordable housing community in the City of Cloverdale on Tribal fee land on an approximately 3.32-acre portion located in the southwest corner of the parcel identified by APN: 117-040-107 and located at 27821 Dutcher Creek Road. The subject property (APN: 117-040-107) in its entirety represents the subject Site. The Project would also include the development of a Behavioral Health and Wellness Center (Wellness Center). The total disturbed area is approximately 4 acres and includes the 3.32-acre portion of the Site (proposed Lot 1) where the proposed development would occur, in addition to utility connection and staging areas (Development Area; see Figure 1). A site plan depicting the proposed development layout is provided as Figure 4.

To facilitate the proposed development, the Project would involve a General Plan Amendment (GPA) to change the City land use designation from General Industry (GI) to General Commercial (GC) (see Figure 2), a Rezone to change the City zoning designation from General Industrial (M-1) to General Commercial (G-C) (see Figure 3), and a minor subdivision of 16.52 acres into one 3.32+/- acre lot to accommodate the proposed development and a designated remainder 13.20+/- acre lot (see Figure 4).

The Project's preliminary improvement plans and architectural plan set are enclosed in Appendix B and Appendix C, respectively.

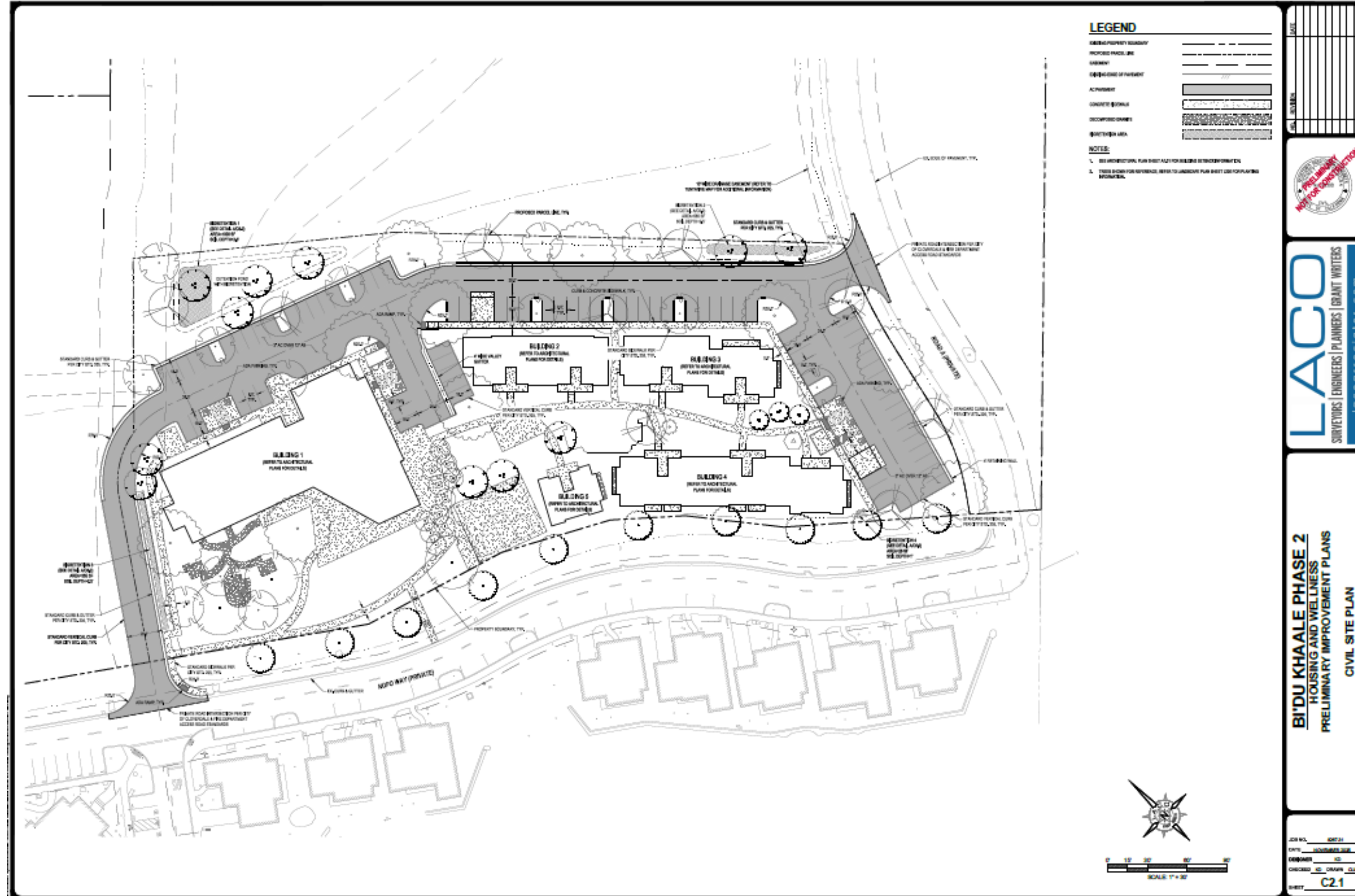
Project Components

The following subsections provide additional details on the individual Project components, including the proposed housing community, Wellness Center, GPA/Rezone, and Minor Subdivision.

Proposed Housing Community Development

The proposed Project would include the development of an all-electric 53-unit affordable housing community. The units would consist of 26 one-bedroom units, 13 two-bedroom units, and 14 three-bedroom units (which includes one 3-bedroom manager unit). Income restrictions would range from 30% to 60% Area Median Income (AMI). Twenty-six units (23 one-bedroom units and 3 three-bedroom units) are permanent supportive housing (PSH) units that are defined rental housing with no limit on length of stay, occupied by a special needs population as specified in the housing element, with on-site or off-site services assisting residents to retain their housing, improve their health status, and maximize their ability to live and, where possible, work in the community as defined by the Cloverdale Municipal Code (CMC) Section 18.14 *Zoning Code Definitions* and the California Department of Housing and Community Development (HCD). Additionally, 26 units, including 3 one-bedroom units, 13 two-bedroom units, and 13 three-bedroom units would serve low-income

Figure 4. Site Plan



tribal households. Additionally, one three-bedroom managers unit would provide on-site residency for the on-site property manager. In total, there would be 53 units spread across approximately 3.32 acres of land, resulting in a density of 15.96 units per acre. One building (Building 1) would be three stories, a maximum height of 37 feet and contain 24 units. Four buildings (Buildings 2-5) would be two stories, a maximum height of 28.5 feet, and contain four, eight, or nine units (see Appendix C), as summarized in Table 1, below. Building 1 would contain an elevator and commercial office space (to be used for the Wellness Center) and residential amenities area on the ground floor. The residential buildings would surround a large 15,000+/- square-foot central greenway. As provided in Table 1, total gross floor area of the buildings would comprise approximately 62,783 square feet. Per the Project's architectural plans (Appendix C), 10 percent of the units would be mobility accessible and 4 percent of the units would comply with communications accessibility (CTCAC) standards.

These buildings are geared primarily towards families, with a predominance of two- and three-bedroom units, with shared porch entries facing inward toward the greenway. The buildings would be designed with continuous undulating roofs to optimize solar gain for the photovoltaic (PV) solar system.

Table 1. Summary of Proposed Housing Community

Building ID	Total Number of Units	Unit Types per Building			Approximate Area (in square feet)
		One-Bedroom Units	Two-Bedroom Units	Three-Bedroom Units	
1	24	22	2	0	33,594
2	8	0	7	1	7,006
3	8	0	4	4	7,883
4	9	0	0	9 (including manager's unit)	11,698
5	4	4	0	0	2,602
Total	53	26	13	14	62,783
<i>Typical Unit Size</i>		<i>650 sf</i>	<i>850 sf</i>	<i>1,115 sf</i>	--

Source: Ryatok Architects, Inc. and Akinpaz. November 21, 2025. Architectural Plan Set (see Appendix C).

Amenities would include on-site property management offering resident enrichment activities, on-site supportive services for PSH residents, a community room with TV, ample green spaces, a playground, a fitness room with showers, common area restrooms, in-unit laundry for two-bedroom and three-bedroom units, and shared laundry for one-bedroom units. The community would also include a "half-court" basketball court and offer a total of 86 parking spaces (including 7 accessible parking spaces) in compliance with City of Cloverdale parking standards. The proposed Project would be developed with community utility services including water, wastewater, and electricity [described further under Section XVIX (Utilities and Service Systems)]. All residential amenities would be located along an accessible path of travel.

Proposed Wellness Center Development

The Wellness Center would consist of commercial space on the ground floor. The Wellness Center would serve as a satellite office for the sponsor's in-house Tribal Wraparound supportive services program to provide case management, therapy, and other treatment/services integral to tribal members' overall wellbeing. Hours for the Wellness Center would be Monday through Friday from 9:00 AM – 5:00 PM. The close proximity

of the Wellness Center to the PSH units would foster an environment conducive to the recovery of PSH residents. The Wellness Center would not generate income for the proposed housing community.

General Plan Amendment (GPA) and Rezone

The Site (APN: 117-040-107) is currently designated General Commercial (GC) on approximately 8.0 acres and General Industry (GI) on approximately 8.52 acres under the *City of Cloverdale General Plan* (General Plan) and zoned General Commercial (G-C) and General Industrial (M-1) pursuant to the *City of Cloverdale Zoning Code* (Zoning Code), respectively. This split land use and zoning reflects historical conditions on the property and does not align with the Applicant's proposal to develop multi-family housing and supportive services on the southwest portion of the parcel.

To allow the proposed development, the Applicant seeks to amend the current land use and zoning designations of the Site. Under the proposed Project, the GC/G-C designation and zoning would be extended southwest within the parcel boundary, expanding the area where multi-family housing and public/quasi-public uses are permitted (see Figures 3 and 4). As a result, the portion of the Site designated and zoned for industrial use would be reduced from approximately 8.52 acres to 5.64 acres, and the area designated and zoned for commercial use would increase from approximately 8.0 acres to 10.88 acres (see Table 1, below).

This change would ensure that the approximately 3.32-acre parcel created for Phase 2 (Lot 1, discussed further below) is fully designated and zoned for General Commercial uses, thereby allowing development and use of both the proposed 53-unit multi-family housing development and the associated Wellness Center. As provided in Table 18.05-030-A *Uses Permitted within Commercial Zoning Districts* of Chapter 18.05.030 of the Cloverdale Municipal Code (CMC) include multi-family residential development¹ such as the proposed 53 units and public/quasi-public uses² such as the proposed Wellness Center (CMC Title 18 Zoning, 2024). The balance of APN: 117-040-107 would retain its existing GI/M-1 designations for potential future industrial use.

Table 2, below, shows the current and proposed area (in acres) comprising each land use and zoning designation on the subject parcel.

Table 2. Current and Proposed Area (in Acres) of the Site's Land Use and Zoning Designations

Land Use Designation	Zoning Designation	Current Acreage	Proposed Acreage	Change (in Acres)
GC	G-C	8	10.88	+2.88
GI	M-1	8.52	5.64	-2.88
Total		16.52	16.52	0

Note: All acreages listed in the table above are approximate.

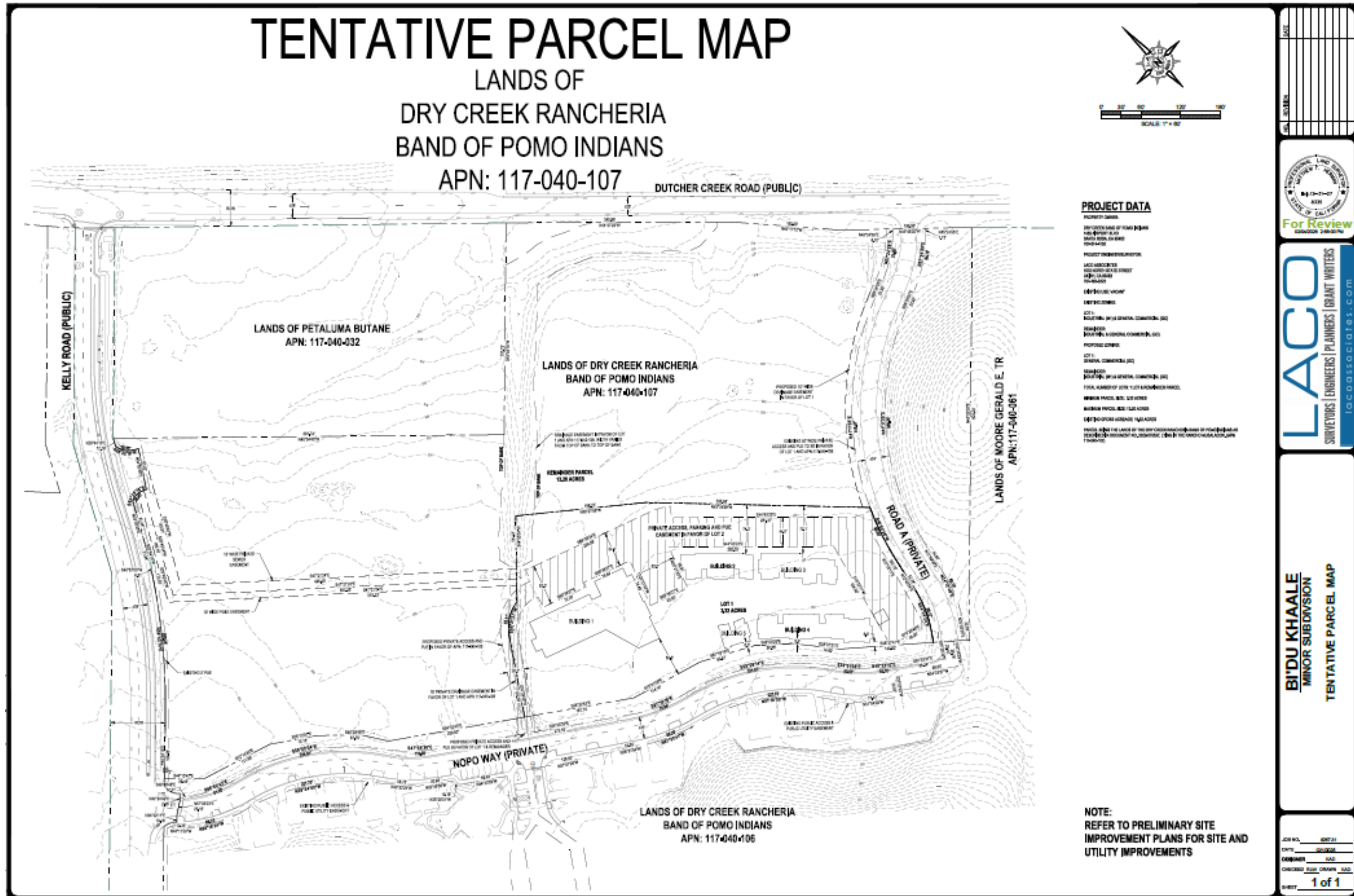
Minor Subdivision

In addition to the proposed GPA and Rezone, the Applicant seeks approval of a Minor Subdivision to create a new parcel within APN: 117-040-107 to accommodate the proposed housing and Wellness Center development. The parent parcel (APN: 117-040-107; Site) is approximately 16.52 acres in size. The proposed subdivision would establish a new approximately 3.32-acre lot (Lot 1) in the southwest portion of APN: 117-040-107, adjacent to the completed Phase 1 Bi'du Khaale Housing Project. The remainder of the parcel (Remainder Parcel) would comprise approximately 13.52 acres and remain in its existing undeveloped condition (see Figure 5).

¹ Multi-family residential development is permitted subject to Plot Plan Review.

² Public/Quasi-Public uses can be permitted subject to issuance of a Conditional Use Permit (CUP).

Figure 5. Tentative Parcel Map



The proposed parcel configuration would follow the alignment of Road B, the new internal access road to be constructed as part of the Project. Lot 1 would contain all proposed residential buildings, the Wellness Center, parking areas, bioswales, and internal circulation improvements. The Remainder Parcel would be available for future development consistent with the previously described land use and zoning designations.

Following City approval and recordation of the Parcel Map with the Sonoma County Clerk-Recorder, the approximately 3.32-acre lot would be assigned a new APN. This APN would be used in connection with all subsequent planning, permitting, and environmental review for the Bi'du Phase 2 Housing and Wellness Project.

Design Review

The proposed Project is subject to Design Review pursuant to Chapter 18.03.150 of the CMC, which requires review of new multi-family residential and mixed-use development to ensure consistency with the City's design standards, guidelines, and objectives.

As part of the Design Review process, the City will evaluate the Project's overall site layout, building design, landscaping, circulation, lighting, and integration with the surrounding neighborhood and adjacent Phase 1 development. The Project has been designed to foster a sense of community while balancing functional residential, supportive service, and wellness uses on-site.

The proposed design features include:

- Buildings: A three-story, elevator-served building containing one- and two-bedroom units and ground-floor common areas, plus four two-story residential buildings containing one-, two-, and three-bedroom units surrounding a central courtyard.
- Architecture: Contemporary design with durable, energy-efficient, and Wildland Urban Interface (WUI) compliant materials, consistent with the City's Design Guidelines and the Applicant's commitment to an all-electric development.
- Amenities: A large, landscaped courtyard, children's playground, green spaces, a fitness room, and community gathering areas.
- Wellness Center: A ground-floor commercial-style space providing outpatient behavioral health and wraparound services collocated with adjacent to the residential community.
- Circulation and Access: Internal circulation via Road B, including curbs, gutters, and sidewalks, with 85 parking spaces and stormwater improvements integrated into the site plan.
- Lighting and Landscaping: Street and pedestrian-scale lighting designed to be Dark Sky-compliant, with new landscaping using native, drought-tolerant, and WUI compliant species to complement the Site and provide shade and screening.

Through Design Review, the City will ensure that the Project is consistent with the City's General Plan, zoning requirements, and adopted design standards, and that it complements the adjacent Phase 1 Bi'du Khaale Housing Project and the broader community context.

As previously described, the primary residential buildings (Buildings 2, 3, 4, and 5, as identified in Figure 1 and Sheet C2.1 *Civil Site Plan* included in Appendix B) would provide primary access through a means of shared porch entries facing internally facing the greenway. The roofs would be designed in a manner to fully optimize a roof-mounted PV solar system to reduce reliance on the local electric grid, positioned so as to not create undue glare or light reflections to the neighboring buildings or properties. The exterior cladding material would be fiber cement board and battens and panel siding with large vinyl windows to maximize

daylight and natural ventilation. Entry balconies would be framed by circular wood columns accentuating the structure, wood looking siding and color accents would be located at the entry staircases. The southwest-facing elevations of the two-story buildings provide a frontage facing Nopo Way. The small patios and regular recesses intend to break up the façade, while the recesses highlight artful patterned siding, noting cultural symbolism of the Dry Creek Rancheria Band of Pomo Indians, representing a strong presence of culture and belonging to the residents. Along with the 29 units provided in these buildings, a maintenance room and bike room would occupy a portion of the ground floor of Building 4. The greenway would include walking pathways, a shared covered picnic area/gathering space, playground, and native plantings for both sensory experiences and traditional healing.

The three-story community building (Building 1) proposes to include 24 residential units located on the second and third floors. The ground floor would provide community amenity spaces that include a central lobby, mail nook, laundry room, property management offices, a fitness room, and a community room opening out to an outdoor gathering space. The ground floor is also intended to provide a warm shell for a future 4,200-square-foot Wellness Center to serve the residents and the larger community of the Dry Creek Rancheria Band of Pomo Indians. The community room structure itself is intended to be a bespoke structure with visibly expressed round wood structural/sculptural elements paired with a dramatic sloped roof. The community room is oriented to directly face the existing community room at Bi'du Khaale Phase 1, a gesture to affirm the cohesive inclusion of the community from Bi'du Khaale Phase 1 with the proposed Project (Phase 2). The exterior of the community building would be clad in fiber cement board and battens in an organized patterning, the lower-level differing from the upper levels in patterning and, in some cases, color. Sloping roofs with overhands would bring down the massing perception, along with recesses along the longer facades. The two major forms of this three-story building would be intersected by a corridor bridge that further serves to break down the massing and provides a lit lantern at night and an observation area for residents during the day. The residential levels would be setback from the property management offices when observed from the eastern parking areas. This setback serves to reduce the visual mass and, thus, decrease the bulk of the building's form. A contrasting base color wrapping the first level also serves to help break the massing up into smaller forms relating to human scale more evidently. The lower level at the community room, comprising the Wellness Center and offices, would include both storefront windows and large format vinyl windows with a film coating for privacy at the Wellness Center. A wood trellis with an expression similar and simplified from the community room is proposed at the entry located at the east parking entrance.

Surrounding the community room would be a large patio for gatherings positioned adjacent to an intermediate green space between the three-story building (Building 1) and the two-story walkups (Buildings 2-5) previously described. As previously described, a half-court basketball court would be located in this area as well, which is a favored past time of the community, along with a central picnic lawn, densely planted trees and native plantings for sensory experiences and traditional healing.

Construction Summary

Construction is anticipated to occur over approximately two years, beginning in late 2027. The Applicant intends to apply for Low Income Housing Tax Credits in March 2027, with permits anticipated by December 2027. Following receipt of permits, construction is expected to begin in December 2027 and conclude by approximately late 2029. Construction would generally occur between 8:00 am and 7:00 pm, Monday through Friday.

In total, construction activities are anticipated to disturb approximately 4 acres, corresponding to the newly proposed subdivision area within APN: 117-040-107, and space for construction staging and storage easterly of the proposed Lot 1, and utility connections through the remainder parcel. Disturbance would primarily

affect non-native grassland and a portion of the ephemeral channel along the northern boundary (ESA, 2026).

Buildings would be constructed on a Type V slab-on-grade. Excavation for grading, foundations, utilities, and road construction is anticipated to extend to a depth of approximately 5–10 feet. Final disturbance limits and excavation depths would be confirmed in construction drawings. Construction activities would generally include the following:

- Site preparation and grading;
- Building and roadway construction; and
- Underground utility installation.

During construction, Best Management Practices (BMPs) would be implemented in accordance with a Stormwater Pollution Prevention Plan (SWPPP) to be prepared for the Project pursuant to the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (CGP), administered through the State Water Resources Control Board (SWRCB). Compliance with the CGP and a Project-specific SWPPP would help to prevent the discharge of construction waste, debris, and contaminants from construction materials, tools, and equipment from leaving the Site. Three bioswales and one detention pond have also been incorporated into the Project design.

The following list of equipment and machinery that may be utilized for construction of the Project is not an all-inclusive list. This list exemplifies typical machinery and equipment used for similar projects; exact equipment types and methods are at contractor's discretion.

- Front-end loader and dump truck (or other earthmoving equipment);
- Grader, scraper, excavator, transfer unit;
- Angle-blade bulldozer;
- Clinometer or Abney level;
- Survey equipment, survey flags, colored plastic tape, or stakes; and
- Ax, brush hook, chainsaw, and additional handheld or gas-powered tools.

When not in use, materials and equipment would be stored on the designated remainder parcel in the location of the existing gravel equipment and material storage area which was used for the Bi'du Khaale Elders Village Project (Phase 1 of the Project). This area is adjacent to the east of the proposed Development Area.

Vegetation Removal

A *Biological Resource Memorandum* (Biological Report) was prepared by Environmental Science Associates (ESA) dated February 6, 2026. Per the Biological Report, a biological survey was performed on July 18, 2025, which found the approximately 4-acre study area to appear to have been recently graded and covered with non-native annual grassland vegetation. Vegetation removal would primarily consist of clearing non-native annual grassland vegetation, which currently dominates the study area. Sparse cover includes rose clover, yellow star thistle, hayfield tarweed, dove weed, and other non-native grasses and forbs. Approximately 15 young oak saplings (valley oak and coast live oak) have been planted along the parcel perimeter. Tree or shrub removal is expected to be minimal. It is noted in the Biological Report that the non-native grassland may provide low-quality habitat for small mammals, reptiles, and nesting birds. Should vegetation removal and/or grading be proposed between February 1 and August 31, a nesting bird survey would be required prior to these activities (ESA, 2026).

Site Access and Parking

Vehicular access and parking design would enable a circular travel pattern around the Site through the development of "Road B", a 26-foot-wide road allowing two-way vehicle traffic to safely ingress and egress the Site as well as access the proposed parking areas. The entry and exits to the Site would be along the western and southern boundaries of the Site where Road B would intersect with Nopo Way and Road A, respectively. Road B would be developed in accordance with the City of Cloverdale and Cloverdale Fire Department requirements, allowing emergency vehicle access to the Site from all sides via Nopo Way, Road A, and internal Road B. A short section of Road B from the intersection of Road B and Nopo Way (on the southern side of this section) would include the development of a standard sidewalk (per City Standard 205) that would diverge away from the road and connect to the internal walking paths of the Site as described above. Standard curb and gutter development would be included along Road B along the eastern edge of the road providing clear delineation of the Site's parking areas and the bioretention facilities along the property's eastern boundary.

A total of 86 parking spaces and 1 loading space (located south of Building 1) would be provided on-site under the Project. In accordance with Table 18.11.050-A5-4 (*Off-Street Vehicle Parking by Land Use*) of Section 18.11.050 (*Off-street Parking by Land Use*) and Section 18.11.150 (*Loading Areas*) of Chapter 18.11 (Parking and Loading Requirements) of Chapter 18.11 (Parking and Loading Requirements) of the CMC, a total of 66 parking spaces would be required for the Project, determined by proposed land use types ("supportive and commercial within a G-C Zone"), as shown in Table 3. Of the total parking spaces proposed, 7 spaces would be accessible parking spaces (2 van and 5 standard accessible spaces) and 2 spaces would be for electric vehicles (EV) (see Figure 4 and Appendix C).

As shown in Table 3, below, the Project would provide 20 additional parking spaces than required under CMC Section 18.11.050. With the surplus in parking proposed (86 total spaces to be provided), there would be sufficient parking for both residents and guests at the subject Site.

Table 3. Required Number of On-Site Parking and Loading Spaces Required for Project

Land Use Type	Parking Space Requirement	Loading Space Requirement	Number of Units or Square feet (sf)	Total Number of Parking Spaces Required	Total Number of Loading Spaces Required
<i>Supportive Housing and Commercial within G-C Zone</i>					
Supportive Housing (23 1-bedroom units and 3 2-bedroom units)	0 spaces per unit	N/A	26	0	N/A
1-bedroom Unit	1 space per unit	N/A	3	3	N/A
2-bedroom Unit	1.5 spaces per unit	N/A	10	15	N/A
3-Bedroom Unit	1.5 spaces per unit	N/A	14	21	N/A
Commercial (Wellness Clinic and Fitness)	1 space per 250 sf gross floor area	1 space per 14,000 sf	4,102	17	1
<i>Total Parking Spaces Required</i>				56	--
<i>Total Loading Spaces Required</i>				--	1
Total Number of Parking and Loading Spaces to Be Provided				86	1
<i>Difference</i>				+20	0

Sources:

Cloverdale Municipal Code, Table 18.11.050-A5-4 (Off-Street Vehicle Parking by Land Use) of Section 18.11.050 (Off-street Parking by Land Use) of Chapter 18.11 (Parking and Loading Requirements).

Cloverdale Municipal Code, Section 18.11.150(C) (Loading Areas) of Chapter 18.11 (Parking and Loading Requirements).

Ryatok Architects, Inc. and Akinpaz. November 21, 2025. Architectural Plan Set (see Appendix C).

In addition, a bicycle storage area located on the ground floor of Building 4 would be developed.

Utilities and Services

The City would serve the Project with potable water service for both fire protection and domestic water needs, in addition to community wastewater service. Water and sewer mains would be installed within the Development Area and would connect to existing service connections within the vicinity of the Site.

Stormwater would be directed to and controlled via several on-site improvements, including three bioswales and one detention pond along the northern boundary of the Development Area. These features would be designed and located to allow infiltration, water detention, and natural filtration of stormwater on-site. The installation of a new 36-inch culvert extension from the west would carry runoff from upstream (off-site) under the proposed road and outlet to the east.

Electricity in the City is provided by Pacific Gas and Electric Company (PG&E) and ultimately would be a supplier of electricity to the Development Area. Additionally, as previously described, the roofs of Buildings 2, 3, 4, and 5 would be designed to accommodate the installation of PV solar panels to capture energy and

convert it to electrical power with the goal of significantly reducing reliance on the power grid and reducing utility costs for the tenants.

These utilities would be routed underground between the Development Area and a utility junction located on Kelly Road. A utilities easement would be defined and agreed upon between the landowner and the utilities providers that would allow access to the sanitary sewer line and the dry utilities trench line. The sanitary sewer line would be installed underground and run approximately 501 linear feet (LF) north from the Development Area toward Kelly Road where it would dog leg east and run for approximately 191 LF parallel with the northern property line abutting Kelly Road. The dry utilities trench line would run parallel but separate to the sanitary sewer line and terminate along Kelly Road at the existing power vault.

Lighting

Street lighting would be installed as part of the Project. Lighting would be utilized to provide an attractive, safe, and secure nighttime environment for the proposed Development Area. All exterior lighting would be directed downward with full shields and be International Dark Sky Association-compliant.

Landscaping

As generally described above, landscaping would feature native and culturally appropriate plant species, well suited to Cloverdale's climate and the Dry Creek Rancheria Band of Pomo Indians tribal heritage and culture. By choosing vegetative features that meet both goals, the Project would minimize maintenance needs, reduce the use of chemical fertilizers and pesticides, and conserve water. The on-site parking areas feature planters that would provide space for native tree species creating areas of shade and reducing the localized heat desert effects associated with parking lots. The overall design includes the planting of 62 trees on-site, with trees to be placed in key locations throughout the parking areas as well as in and around the previously described greenway to offer shaded areas around designed outdoor gathering and walking locations. An automated, low-volume drip irrigation system would be utilized on-site. The Project's landscape plans are enclosed as Appendix D.

Entitlements/Approvals

The following entitlements/approvals from the City would be required for the proposed Project:

- Conditional Use Permit (for the Wellness Center)
- Tenant Improvement Permit (for the Wellness Center)
- Minor Subdivision
- General Plan Amendment
- Rezone
- Design Review

The following permits from State and Federal agencies may be required after the City approves the entitlements:

- Lake or Streambed Alteration Agreement from California Department of Fish and Wildlife
- Water Quality Certification 401 permit from the Regional Water Quality Control Board
- EPA Water Quality Certification should the State Water Quality Control Board not take jurisdiction
- Construction General Permit from the State Water Resources Control Board

III. PROJECT SETTING AND LOCATION

The Site (APN: 117-040-107) is located within the city limits of Cloverdale. The Site is bounded to the northwest by vacant lots; to the northeast by Dutcher Creek Road and Highway 101; to the southeast by a construction rental facility and vacant lots; and to the southwest by the Bi'du Khaale Phase 1 Housing Project and vacant land further to the west.

The Site is undeveloped but previously disturbed, having been used for access and staging during construction of the Phase 1 of the Bi'du Khaale Housing Project. Total disturbed area would be approximately 4 acres, including the 3.32-acre lot (Lot 1) where the proposed housing units and Wellness Center are proposed, in addition to the utility connection and staging areas. The Development Area is located on the southwest corner of APN: 117-040-107 and is generally flat, with elevations between 320 and 330 feet. Vegetation is dominated by non-native annual grassland with sparse cover. Along the northwestern boundary of the Development Area, an ephemeral drainage channel flows northeast through the parcel before entering culverts under Dutcher Creek Road and Highway 101, eventually discharging to Icaria Creek, a tributary of the Russian River (ESA, 2026). While the feature is unlikely to qualify as a Water of the U.S. under the Clean Water Act, it is expected to be regulated as a Water of the State and a stream under California Fish and Game Code. Any culverting or modifications associated with Road B construction would require agency review and permitting.

IV. ENVIRONMENTAL EFFECTS

An environmental checklist follows this section and addresses all potential adverse effects resulting from the proposed Project. No significant adverse effects are expected from any of the proposed activities.

V. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a **"Potentially Significant Impact"** or **"Potentially Significant Unless Mitigation Incorporated"** as indicated by the checklists on the following pages.

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

An explanation for all checklist responses is included, and all answers take into account the whole action involved and the following types of impacts: off-site and on-site; cumulative and project-level; indirect and direct; and construction and operational. The explanation of each issue identifies (a) the threshold of significance, if any, used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance. All mitigation measures required for the Project are included in the Mitigation Monitoring and Reporting Program (MMRP), enclosed in Appendix A.

In the checklist the following definitions are used:

"Potentially Significant Impact" means there is substantial evidence that an effect may be significant.

"Potentially Significant Unless Mitigation Incorporated" means the incorporation of one or more mitigation measures can reduce the effect from potentially significant to a less than significant level.

"Less Than Significant Impact" means that the effect is less than significant and no mitigation is necessary to reduce the impact to a lesser level.

"No Impact" means that the effect does not apply to the proposed Project or clearly will not impact nor be impacted by the proposed Project.

DETERMINATION: (To be completed by the Lead Agency on the basis of this initial evaluation)

<input type="checkbox"/>	I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	I find that although the proposed Project could have a significant effect on the environment, there will 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 will be prepared.
<input type="checkbox"/>	I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	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.
<input type="checkbox"/>	I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have 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.

Rafael Miranda
Signature

4-13-26
Date

Rafael Miranda, Associate Planner
Name and Title

I. AESTHETICS. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

The Site is located within the southern portion of the City of Cloverdale's Urban Growth Boundary, City Limits, and Sphere of Influence. The Site is in a transitional area between existing development to the north and west, and agricultural and open lands to the south and west. The Site is surrounded by a mix of residential, commercial, and light industrial uses, including established neighborhoods and community-serving development to the north, Phase 1 of the Bi'du Khaale Housing Project to the southwest, rural residential and undeveloped lands to the south and west, and Highway 101 with associated commercial and light industrial uses to the east. The Site is partially visible from Kelly Road and intermittently from Highway 101, though views are screened in places by roadside vegetation. According to the California Department of Transportation (Caltrans) State Scenic Highway Program, there are no designated State Scenic Highways within or in close proximity to the City of Cloverdale. However, there is an "Eligible" State Scenic Highways near Cloverdale, Route 128, which connects to North Cloverdale Boulevard just north of the Cloverdale city limits and connects to Highway 101 approximately 6.32 miles south of the Site outside of City limits. The nearest officially designated Scenic Highways are located approximately 28 miles to the south, including Highway 116, from Highway 1 to the Sebastopol city limit, and Highway 12, from Danielli Avenue east of Santa Rosa to London Way near Agua Caliente (Caltrans, 2020).

The Site consists of a central relatively flat area with gentle terrain variation. Elevations across the parcel range from approximately 325 to 350 feet above mean sea level (AMSL) (City of Santa Rosa, n.d.). The Site is currently undeveloped and supports a mix of ruderal vegetation, grassland, and scattered oak trees (ESA, 2026).

Visual Character and Views:

- From the east (Kelly Road/Highway 101 corridor): Views toward the Site are partially obstructed by roadside vegetation but open in places to the central portion of the parcel.
- From the west (wooded hillsides): The Site is visible as a disturbed flat expanse framed by foothills and oak woodland.
- From the north (residential neighborhoods): Views are largely screened by existing development and vegetation.
- From the south (adjacent open/rural lands): Views toward the Site include disturbed ground and low vegetation with Highway 101 in the background.

The Conservation, Design, and Open Space (CDO) Element of the City of Cloverdale's General Plan (2009, amended 2015) establishes goals, policies, and programs to guide the conservation of natural and scenic resources, the design quality of new development, and the integration of open space and vegetation into the built environment. The Element seeks to shape growth so that it respects Cloverdale's natural setting—its river corridors, natural vegetation, and landforms—and ensures new development contributes to a coherent, visually pleasing, and environmentally sustainable city. Key themes include preserving valley-floor character, protecting natural vegetation (especially oak woodlands and riparian corridors), enhancing tree canopy and landscaping, managing lighting and vistas, and ensuring that public and private development incorporate open space and scenic qualities. The proposed Project is designed to adhere to applicable CDO goals and policies including (but not limited to) CDO 1-1 requiring urban development within the city to be on the valley floor³, CDO 6-5 requiring the planning and implementation of said plan for street trees parallel to streets, in planter strips, in sidewalks, or at back of sidewalks, spaced at regular intervals along the street, and CDO 6-7 which requires the use of drought-tolerant or native to Mediterranean climate trees, shrubs, and ground covers for use in public and private landscaping development approvals (General Plan, 2009, amended 2015).

The Urban Lighting Element of the General Plan provides goals, policies, and programs related to lighting standards for the City. Any outdoor lighting associated with the Project would be required to conform to the requirements of CMC Section 18.09.050 (Outdoor Lighting), which ensures lighting design minimizes glare and spillover effects on adjacent properties and the night sky.

Overall, while the Site is located in proximity to open space and natural landscapes, it is not within a designated ridgeline, scenic corridor, or scenic highway. Development of the Site would be required to comply with the City's hillside, outdoor lighting, and design standards to ensure that future structures and improvements are visually compatible with surrounding uses.

IMPACT ANALYSIS

I.a) **Less Than Significant.** As previously discussed, The Site is relatively flat (325–350 feet AMSL) and is partially visible from Kelly Road and intermittently from Highway 101, though views are screened in places by roadside vegetation. No prominent ridgeline or designated scenic vista overlays the parcel. As such, development of the Site would not obstruct or degrade a recognized scenic vista. This impact would be less than significant.

I.b) **No Impact.** As previously discussed, the Site is not located within or adjacent to a designated or eligible State Scenic Highway corridor. According to the California Department of Transportation (Caltrans) Scenic Highway Program, the nearest officially designated scenic highways are Highway 116 (Highway 1 to Sebastopol city limit) and Highway 12 (east of Santa Rosa to Agua Caliente), neither of which are within or near the City of Cloverdale (Caltrans, 2020). Highway 101 through Cloverdale is not designated as a State Scenic Highway. The Site does not contain historic structures or unique rock outcroppings. While the Site supports scattered oak trees, tree removal would be subject to the City of Cloverdale Tree Preservation Ordinance (CMC Section 15.30). As such, the Project would not damage scenic resources within a State scenic highway corridor. No impact would occur.

I.c) **Less Than Significant.** As previously discussed, the Site is located within the southern portion of Cloverdale's Urban Growth Boundary (UGB) and Sphere of Influence (SOI). The Site is currently undeveloped, supporting

³ "Valley Floor" is defined by Policy CDO 1-1 as "...the land below the 400 foot elevation." (City of Cloverdale, 2009, amended 2015).

ruderal vegetation, grassland, and scattered oak trees, with more developed vegetation on the western hillside (ESA, 2026). Surrounding uses include residential neighborhoods to the north, rural residential and undeveloped lands to the south and west, and Highway 101 and Dutcher Creek Road to the east. Public views toward the Site are most available from Kelly Road and intermittently from Highway 101.

Development of 53 affordable housing units and a Wellness Center would change views from undeveloped to residential/community-serving. However, urban development is anticipated in this location by the General Plan, and proposed structures must comply with applicable City design and outdoor lighting standards. The Project would alter visual character but would not substantially degrade the existing visual quality of public views in a non-urbanized area.

As such, the Project would alter the visual character of the Site but would not substantially degrade the existing visual quality of public views in a non-urbanized area. A less than significant impact would occur.

I.d) **Less Than Significant.** As noted above, development proposed under the Project includes construction of 53 affordable housing units and a proposed Wellness Center with private open spaces, private roads, private walking trails, and landscaping. Potential impacts associated with light and glare at the Site would be reduced to extent feasible through compliance with the City's General Plan and CMC, including Section 18.09.050 (Outdoor Lighting), which requires, at a minimum, that lighting fixtures aim downward, or toward structures, in order to prevent glare, light trespass, and light pollution. Consistency with the General Plan and CMC would help to ensure the proposed Project would not cause substantial light or glare, which would adversely affect day or nighttime views in the area. Sensitive receptors located near the Site include a single-family residential neighborhood, located approximately 1,600 feet northwest of the Site, several additional residences located approximately 1,400 feet southeast of the Site, and the newly developed 23-unit age restricted residential development adjacent to the Site along its southwest boundary (Phase 1 of the Bi'Du Khaale Project). However, due to adherence with the requirements of the General Plan and CMC, the Project would not cause light or glare that would cause a significant impact on these residences. A less than significant impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Aesthetics.

II. AGRICULTURE AND FORESTRY RESOURCES. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

The Site, identified by APN: 117-040-107, is located within the southern portion of the City of Cloverdale and has a General Plan land use designation of General Industry (GI) and a zoning designation of General Industrial (M-1) under the CMC [Title 18 (Zoning) Chapter 18.05 (Industrial Districts), 2024]. The proposed Project includes a General Plan Amendment to change the land use designation to General Commercial (GC) and a Rezone to change the zoning designation to General Commercial (G-C), respectively. The Site is generally bounded to the northwest by Kelly Road, to the northeast by Dutcher Creek Road, property classified as "Other Land" to the south and southeast with land mapped as "Grazing Land" further to the south and southwest (DOC FMMP, 2022).

According to the Farmland Mapping and Monitoring Program (FMMP) of the California Department of Conservation, the Site is predominantly designated as "Other Land", with small portions mapped as "Grazing Land" along the southwest and southeast boundaries. No areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance are located on-site. While an adjacent parcel to the northwest contains land identified as Farmland of Local Importance under the FMMP, the Site is separated from this parcel by existing urban infrastructure and roadways, including Kelly Road to the northwest (DOC FMMP, 2022). A review of the Sonoma County Williamson Act maps confirms that the Site is not subject to a Williamson Act contract (County of Sonoma, 2018).

The USDA Natural Resources Conservation Service (NRCS) Web Soil Survey identifies five soils on the Site:

- Clear Lake clay, sandy substratum, 2–5 percent slopes (CeB) — approximately 38 percent of the Site.
- Positas gravelly loam, 0–9 percent slopes (PsC) — approximately 27 percent of the Site.
- Laughlin loam, 30–50 percent slopes (LgF) — approximately 16 percent of the Site.
- Suther loam, 30–50 percent slopes (StF) — approximately 11 percent of the Site.
- Laughlin loam, 50–75 percent slopes (LgG) — approximately 8 percent of the Site.

Of these, Clear Lake clay and Positas gravelly loam dominate the central portion of the parcel, while Laughlin and Suther loams are concentrated along the steeper southern and eastern margins. In terms of farmland classification, all soils are designated as Other Land or Grazing Land, and none qualify as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, even under irrigated conditions (NRCS, 2025).

The Site does not contain active agricultural uses, orchards, vineyards, or timber resources, and is instead characterized by disturbed ground with sparse vegetation that reflect past uses of the property for agricultural and trucking purposes (ESA, 2026). While adjacent parcels to the southwest are mapped entirely as Grazing Land, the Site is buffered from these properties by roadways and surrounding urban development. Development of the proposed Project would not directly or indirectly induce the conversion of off-site agricultural lands.

IMPACT ANALYSIS

II.a) **No Impact.** The Site is designated General Industry (GI) under the City of Cloverdale General Plan and zoned General Industrial (M-1). According to the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP), the Site is predominantly classified as Other Land, with smaller areas along the southwest and southeast parcel boundaries classified as Grazing Land. No portions of the Site are mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Development of the Project would, therefore, not convert such lands to non-agricultural use (DOC, 2022). No impact would occur.

II.b) **No Impact.** The Site is not zoned for agricultural uses and is not subject to a Williamson Act contract. The Project includes a General Plan Amendment and Rezone to designate the parcel General Commercial (GC/G-C), which is consistent with the existing urban character of the surrounding area. Because no agricultural zoning or Williamson Act contracts apply, the Project would not conflict with either (City of Cloverdale, 2024; County of Sonoma, 2018). No impact would occur.

II.c) **No Impact.** The Site is not zoned as forest land, timberland, or Timberland Production as defined by Public Resource Code (PRC) section 12220(g) (forest land), PRC section 4526 (timberland) or PRC section 51104(g) (timberland zoned Timberland Production), and does not contain forest resources. The Project would not cause rezoning of such lands (City of Cloverdale, 2024). No impact would occur.

II.d) **No Impact.** The Site is mostly undeveloped and does not contain any forest land and no forest resources are present. Therefore, the Project would not result in the loss or conversion of forest land. No impact would occur.

II.e) **No Impact.** The Site is located within Cloverdale's urban boundary. As previously described, the Site is surrounded by a mix of residential, commercial, and light industrial uses, including established neighborhoods and community-serving development to the north, Phase 1 of the Bi'du Khaale Housing Project to the southwest, rural residential and undeveloped lands to the south and west, and Highway 101 with associated commercial and light industrial uses to the east. The adjacent parcel to the northwest contains land identified as Farmland of Local Importance under the FMMP; however, the Site is separated from this parcel by existing urban infrastructure and roadways, including Kelly Road to the northwest. Development of the Project would not physically extend into or induce conversion of adjacent Farmland of Local Importance (DOC, 2022). Therefore, the Project would not cause indirect farmland conversion. No impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Agricultural and Forestry Resources.

III. AIR QUALITY. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

The Clean Air Act of 1970 (CAA) (as amended 1977 and 1990, 42 U.S.C. 7401 et seq.) established national ambient air quality standards (NAAQS) and generally delegates the enforcement of these standards to the states. In California, the California Air Resources Board (ARB) is responsible for enforcing air pollution regulations. The ARB has, in turn, delegated the responsibility of regulating stationary emission sources to local air agencies. Criteria air pollutants are a group of six common air pollutants [ozone, carbon monoxide (CO), nitrogen dioxide (NO₂) and nitrogen oxides (NO_x), sulfur dioxide (SO₂), particulate matter (PM), and lead] for which the U.S. Environmental Protection Agency (U.S. EPA) has set national ambient air quality standards (NAAQS), and for which California has set California ambient air quality standards (CAAQS). In addition to the criteria air pollutants identified by the U.S. EPA, California adds four state criteria air pollutants (visibility reducing particulates, sulfates, hydrogen sulfide, and vinyl chloride) (EPA, 2025; CARB, 2025[c]).

The Site is located within the North Coast Air Basin (NCAB), which includes Sonoma, Del Norte, Trinity, and Mendocino Counties, and is subject to the requirements of the Northern Sonoma County Air Pollution Control District (NoSoCoAir). The NoSoCoAir is the local agency responsible for monitoring air quality conditions in northern Sonoma County and for carrying out enforcement activities to maintain air quality in compliance with applicable State and federal standards. The entire NCAB is currently designated as “non-attainment,” or in excess of allowable limits, for the state 24-hour allowable limits for breathable particulate matter of 10 microns or less (PM₁₀), and as “attainment,” or within allowable limits, with respect to the balance of the criteria pollutants. Per the District’s *2023 Ambient Air Quality Standards Report (2022)*, the NoSoCoAir is in attainment for all State and federal ambient air quality standards. In addition, Sonoma County received a grade of “A” for high ozone days and a grade of “B” for high particle pollution days between 2021 – 2023, respectively, but the American Lung Association in its *State of the Air 2025 Report (2025)*. The NoSoCoAir also offers a variety of community clear air incentive programs that provide financial incentives for replacement of non-certified wood stoves, purchase of electric vehicles (EVs) and home EV chargers, construction and deployment of public EV charging sites, and ad-hoc vehicle pollution mitigation programs (NoSoCoAir, 2018). The City of Cloverdale additionally requires that dust control measures be instituted during construction, as provided in the *City of Cloverdale Subdivision General Notes: Dust Control Notes (City of Cloverdale, 2004)*. These notes include requirements for the implementation of a dust control program that includes, but is not limited to, watering active construction sites as needed, keeping the area disturbed by excavation or grading to the minimum required, and limiting construction site vehicle speed to 15 mph when traveling on exposed soils.

Additionally, the *Sonoma County Regional Climate Action Plan 2020 and Beyond (CAP)*, prepared by the Regional Climate Protection Agency (RCPA) in July 2016, applies to the County and participating cities, including the City of Cloverdale. As stated in the CAP's Executive Summary, "given the magnitude of human-induced climate change and the projected catastrophic effects from continued global warming, reducing GHG emissions has become an environmental and societal imperative" (RCPA, 2016). Although the CAP's primary goal is the reduction of GHG emissions, the numerous State, regional, and local GHG reduction measures included in the CAP would also help to improve overall air quality.

NoSoCoAir has not developed its own guidance to assist in the evaluation of air quality impacts of projects proposed within the NCAB and therefore recommends using the thresholds and mitigation measures of the *Bay Area Air Quality Management District (BAAQMD) 2022 CEQA Air Quality Guidelines (BAAQMD CEQA Guidelines)*. The BAAQMD CEQA Guidelines provide recommended procedures for evaluating potential air quality impacts during the environmental review process, consistent with CEQA requirements, and include recommended thresholds of significance, mitigation measures, and background air quality information. The BAAQMD air quality-related thresholds of significance are presented in Table 4, below:

Table 4. BAAQMD Air Quality Significance Thresholds

Criteria Pollutant and Precursors	Construction Related		Operation Related
	Average Daily Emissions (lbs/day)	Average Daily Emissions, (lbs/day)	Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82 (exhaust)	82	15
PM _{2.5}	54 (exhaust)	54	10
PM ₁₀ /PM _{2.5} (fugitive dust)	Best Management Practices	None	
Local CO	None	9.0 ppm (8-hour average), 20.0 ppm (1-hour average)	

Source: *Bay Area Air Quality Management District (BAAQMD), 2022.*

As the Site is currently undeveloped grassland, existing emissions at the Site would be anticipated to be negligible. During the Project construction phase, the contractor would be expected to use heavy construction machinery and temporary air pollutant emissions would be associated with grading, excavation, and construction on-site. However, the Project would be required to comply with policies of the NoSoCoAir and the City of Cloverdale regarding the control of fugitive dust during these activities and all construction equipment would be required to be maintained in good working condition. Once construction is complete, emissions from operation of the Project would be comprised of direct and indirect emissions, including exhaust and fugitive dust from the operation of personal vehicles, in addition to the burning of fossil fuels associated with heating and cooling of on-site buildings. Continued compliance with NoSoCoAir emissions standards would be required even after construction of the proposed Project is complete.

Air quality impacts anticipated under full build-out of the Project were modeled using the California Emissions Estimator Model (CalEEMod) and compared to the significant thresholds shown in Table 4, above. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. Further, the model identifies standard mitigation measures to reduce criteria pollutants and GHG emissions along with calculating the benefits achieved from measures chosen by the user (CalEEMod, Not Dated). The CalEEMod results in their entirety are included in Appendix E and assume default assumptions generated by the program based on the Project's characteristics. The proposed uses

utilized for the CalEEMod analysis are presented in Table 5, below, and include the proposed residential units, Wellness Center, and associated parking:

Table 5. Project and Future Potential Development Assumptions

Land Use Type	Land Use Subtype	Unit Amount	Size Metric	Lot Acreage	Square Feet
Proposed Development					
Residential	Apartments Low Rise	53	Dwelling Unit	3.3125	56,180
Commercial	Medical Office Building ¹	4,504	1,000 sf	0.1034	4,504
Commercial	General Office Building ²	6,014	1,000 sf	0.1381	6,014
Parking	Parking Lot	85	Spaces	0.6750	0

Notes:

¹ A Behavioral Health and Wellness Center category is not available in the CalEEMod program. As a result, the Medical Office Building option was selected for a conservative analysis to represent the Wellness Center proposed under the Project.

² The General Office Building category was selected to represent community space, offices, lobby, and maintenance and laundry areas.

Source: CalEEMod Model Results, September 16, 2025 (Appendix E).

For a conservative analysis, the CalEEMod analysis assumes the proposed Project would break ground on December 31, 2027, and be constructed over a period of approximately two years (assuming 5 workdays per week), and would be completed on December 31, 2029, although the actual construction dates are unknown at this time. It is important to note that Project construction would likely halt during the wet, winter months, but would overall take a total of approximately 24 months to complete, based on the default CalEEMod assumptions. The CalEEMod analysis includes basic construction and operational-level mitigation measures that are standard requirements for compliance with NoSoCoAir regulations and the CAP, including watering exposed areas at least twice per day; utilizing low-VOC paints and cleaning supplies; installing low-flow faucets and fixtures; and utilizing a water-efficient irrigation system and landscape. Because these are required for compliance with NoSoCoAir, they are not considered mitigations under CEQA but nonetheless have a mitigating effect on potential air quality impacts. Since vehicles are known to be a major pollution contributor, producing significant amounts of nitrous oxides (NO_x), carbon monoxide (CO), ozone (O₃), and particulate matter (PM_{2.5} and PM₁₀), vehicle use must also be considered when evaluating potential air quality impacts of a proposed project. As such, the CalEEMod analysis includes a basic construction mitigation measure to reduce vehicle speeds on unpaved roads. This basic construction mitigation measure would be implemented as part of the Project pursuant to the *City of Cloverdale Subdivision General Notes: Dust Control Notes* (City of Cloverdale, 2004), as mentioned above. Additionally, please note, the standard mitigation measures utilized in the CalEEMod analysis, including the reduction of vehicle speeds on unpaved roads were applied to evaluate their level of impact on reducing potential emissions, but as shown on Table 3, below, potential impacts would be below the listed thresholds of significance with or without the application of the standard mitigation measures.

The results of the CalEEMod analysis are shown in Table 6, below, and represent the total amount of emissions anticipated over the entire construction period and under operation of the proposed Project.

Table 6. CalEEMod Results for Construction and Operation of the Proposed Bi'du Khaale Phase 2 Project

Pollutant	Emissions (tons/year)				Thresholds	
	Modeled Unmitigated Construction Emissions	Modeled Mitigated Construction Emissions (including % reduction)	Modeled Unmitigated Operational Emissions	Modeled Mitigated Operational Emissions (including % reduction)	Annual (tons/year) Daily (lbs/day)	Thresholds Exceeded?
Reactive organic gases (ROG)	1.06 (5.83)	0.36 (1.95) (-67%)	0.50 (22.9)	0.50 (22.4) (-2%-Daily Only))	10 54	No No
Nitrogen oxides (NO _x)	1.18 (6.44)	1.18 (6.44) (no change)	0.50 (2.74)	0.50 (2.74) (no change)	10 54	No No
Carbon monoxide (CO)	1.58 (8.67)	1.58 (8.67) (no change)	6.99 (38.3)	6.99 (38.3) (no change)	none none	N/A N/A
Sulfur oxides (SO ₂)	<0.0005 (0.01)	<0.0005 (0.01) (no change)	0.01 (0.07)	0.01 (0.07) (no change)	none none	N/A N/A
Particulate matter (PM ₁₀) (total)	0.11 (0.60)	0.11 (0.60) (no change)	0.96 (5.25)	0.96 (5.25) (no change)	15 82	No No
Particulate matter (PM _{2.5}) (total)	0.06 (0.35)	0.06 (0.35) (no change)	0.67 (3.67)	0.67 (3.67) (no change)	10 54	No No

Source: CalEEMod Model Results, September 16, 2025 (Appendix E).

As shown in Table 6, above, the anticipated emissions associated with construction and operation of the 53 multi-family units, Wellness Center, and associated development would be below all annual thresholds of significance for carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM₁₀ and PM_{2.5}), reactive organic gases (ROG), and sulfur oxides (SO₂) without employment of the basic construction and operational-level mitigation measures selected in the CalEEMod analysis, which include standard conditions of the NoSoCoAir regulations and the CAP.

IMPACT ANALYSIS

III.a) **Less Than Significant Impact.** The Project would not conflict or obstruct implementation of any applicable air quality plans. As shown in Table 6, above, the anticipated emissions associated with site preparation and operation would be well-below the BAAQMD's annual thresholds of significance for the six listed criteria and ozone precursor pollutants, as denoted in the BAAQMD CEQA Guidelines, including reactive organic gases (ROG), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO₂), and particulate matter (PM₁₀ and PM_{2.5}) without any mitigation.

Although BAAQMD significance thresholds would not be exceeded for construction and operation of the Project, at all times, site preparation and processing activities at the Site would be required to occur in compliance with the following policies included in Rule 430 (Fugitive Dust Emissions) of the NoSoCoAir's Rule Book:

- Covering open-bodied trucks when used for transporting materials likely to give rise to airborne dust.

- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Containment methods can be employed during sandblasting and other similar operations.
- Conduct agricultural practices in such a manner as to minimize the creation of airborne dust.
- The use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- The application of asphalt, oil, water or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can give rise to airborne dusts.
- The paving of roadways and their maintenance in a clean condition.
- The prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

Compliance with the above standards of the NoSoCoAir's *Rule Book* and the CAP, and implementation of voluntary measures such as reducing vehicle speeds during Project construction, would further reduce PM₁₀ and PM_{2.5} emissions associated with construction. A less than significant impact would occur.

III.b) **Less Than Significant Impact.** Any use or activity that generates unnecessary emissions or airborne particulate matter may be of concern to NoSoCoAir and has the potential to create significant project-specific and cumulative effects to air quality. However, as noted in the discussion above, the NoSoCoAir is in attainment for all State and federal ambient air quality standards. Additionally, the Project would be subject to and designed in accordance with regulations of the NoSoCoAir and the CAP. A less than significant impact would occur.

III.c-d) **Less Than Significant Impact.** Sensitive receptors are generally considered to be people that have an increased sensitivity to air pollution or environmental contaminants, or places where such people may normally be found. These may include, but are not limited to, preschools and daycare centers, K-12 schools, nursing homes, hospitals, and residential dwelling units. Sensitive receptors located near the Site, include the adjacent Bi'du Khaale Phase 1 development, which includes single-family residences, located approximately 115 feet southwest of the Site, across Nopo Way. In order to reduce potential impacts to these sensitive receptors, the Project would be required to implement Best Management Practices (BMPs) during Project construction and operation in compliance with NoSoCoAir *Rule Book* and maintain all equipment in good working condition.

The Project would not create substantial emissions (such as odors or dust) adversely affecting a substantial number of people. Temporary objectionable odors, typical of construction sites and equipment use, may be generated during the construction phase of the Project. As provided in Table 6, above, emissions associated with construction and operation of the Project would not exceed BAAQMD's annual thresholds of significance for the six listed criteria and ozone precursor pollutants. However, temporary exhaust from construction equipment may, for short periods of time, impact residents living and employees working near the Site. With compliance with NSCAPCD's *Rule Book*, fugitive dust and exhaust emissions would be minimized and a less than significant impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Air Quality.

IV. BIOLOGICAL RESOURCES. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

The subject Site is currently vacant and primarily undeveloped. A *Biological Resources Evaluation and Survey Memorandum* (Biological Report) was prepared for the Site by Environmental Science Associates (ESA) dated February 6, 2026 (see Appendix F). The purpose of the Biological Report was to document existing biological resources in the study area as well as provide information on regulatory constraints and potential impacts associated with implementation of the proposed Project.

Per the Biological Report, the study area comprises approximately 4 acres, including the approximately 3-acre area (Lot 1) proposed for development and the immediate surroundings. Biological resources within the study area were identified during a field reconnaissance survey conducted on July 18, 2025. Habitats were evaluated for their potential to support regionally occurring special-status species and the presence of any other biologically sensitive resources such as wetlands, riparian habitat, or drainages. Prior to the surveys, a review of pertinent literature and database queries was conducted for the Project area to aid in field recognition of suitable habitats. The primary sources of data referenced for this report include the following:

- Cloverdale, California USGS 7.5-minute topographic quadrangle map;
- Google Earth color aerial photography for vegetative, topographic, and hydrographic signatures (Google Earth, 2025);

- U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Consultation (IPaC) list of federal endangered and threatened species that may occur in the proposed Project location, and/or may be affected by the Project (USFWS, 2025);
- California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDDB, v. 5.4.14) list of special-status species occurrences within Cloverdale, California and eight surrounding USGS 7.5-minute topographic quadrangles (CDFW, 2025); and
- California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants (v.8-03 0.39) known to occur within the Cloverdale, Asti, Geyserville, Warm Springs Dam, Big Foot Mtn., Tombs Creek, Highland Springs, Hopland and Yorkville USGS 7.5-minute topographic quadrangles (CNPS, 2025).

Based on the information collected prior to and during the field survey, ESA evaluated biological impacts that could potentially result from implementation of the proposed Project.

Vegetation

At the time of the biological survey, the study area appeared recently graded and was covered with non-native annual grassland vegetation. Vegetation within the study area is dominated by ruderal annual grassland characterized by non-native species such as rose clover (*Trifolium hirtum*), yellow star thistle (*Centaurea solstitialis*), hayfield tarweed (*Hemizonia congesta* ssp. *luzulifolia*), and stinkwort (*Dittrichia graveolens*). Planted valley oak (*Quercus lobata*) and coast live oak (*Quercus agrifolia*) saplings occur along the edges of the parcel. The Biological Report also described the disturbed areas of the Site, which includes paved roadways around the perimeter of the Site, a gravel clearing on the north side where trailers were parked at the time of the survey. These areas were further described as being devoid of vegetation, but some stinkwort, star thistle, and other small, weedy grasses and forbs were present.

Grassland vegetation may provide habitat for small mammals and reptiles and nesting habitat for small birds, though wildlife would be more likely in the northern part of the parcel (outside of the area planned for development) in denser grassland. The Biological Report further notes that no mature trees or shrubs are present in the study area to provide cover for wildlife and herbaceous vegetation on-site is sparse. In addition, no listed, special-status, or rare plants were observed on-site. No rare plants are expected to be found within the study area due to the Site's past disturbance (ESA, 2026).

Wildlife

Wildlife observed during the reconnaissance survey included turkey vulture (*Cathartes aura*), western bluebird (*Sialia mexicana*), lark sparrow (*Chondestes grammacus*), rufous-crowned sparrow (*Aimophila ruficeps*), dark-eyed junco (*Junco hyemalis*), wild turkey (*Meleagris gallopavo*), lesser goldfinch (*Spinus psaltria*), American crow (*Corvus brachyrhynchos*), hairy woodpecker (*Leuconotopicus villosus*), house finch (*Haemorhous mexicanus*), common raven (*Corvus corax*), black phoebe (*Sayornis nigricans*), and California pocket gopher (*Thomomys bottae*). No special-status wildlife species were observed during the field survey; however, migratory birds such as white-tailed kite (*Elanus leucurus*), a California fully-protected species, may forage over the study area for insects, lizards, or small mammals, although there is not suitable nesting habitat for this species or other raptors on-site. Suitable habitat for other species, including bat roosting habitat or monarch butterfly host plants or overwintering habitat, was also not observed on-site (ESA, 2026).

Aquatic Resources

An ephemeral drainage swale was identified on the subject property, located adjacent to the Project area to the north. The drainage swale emerges from a culvert just west of the Site and extends eastward toward Icaria Creek and the Russian River. This feature supports limited riparian vegetation such as pennyroyal (*Mentha pulegium*), curly dock (*Rumex crispus*), and spike rush (*Eleocharis macrostachya*). While the riparian

vegetation may provide habitat for small mammals, reptiles and amphibian species, as well as nesting habitat for small birds, the riparian vegetation was observed to be sparse and likely to provide limited cover (ESA, 2026).

The Biological Report concludes that this ephemeral channel is potentially jurisdictional, referencing the *Aquatic Delineation Report* (see Appendix C of the Biological Report) performed for the adjacent parcel (APN: 117-040-106) in 2020. The 2020 Aquatic Delineation concluded that the channel (just upstream from the ephemeral drainage) is not likely to be a jurisdictional water of the U.S. because it does not appear to sustain a continuous surface connection to the Russian River located one mile to the east. It does go on to state that the channel, however, would likely be considered a water of the State of California and would likely also be considered a stream by the California Department of Fish and Wildlife (CDFW). It is further noted that any disturbance to the channel is likely to require permits from regulatory agencies, such as the North Coast Regional Water Quality Control Board (NCRWQCB) and CDFW (ESA, 2026).

Special-Status Species

As detailed in the Biological Report, based on the background research and observations made during the survey, the study area is not likely to host special-status plant or wildlife species and does not contain sensitive terrestrial natural communities. Although the vegetation was sparse during the time of the survey, it may thicken prior to construction on-site which could provide habitat for nesting birds. As such, to minimize the potential for associated impacts, a nesting bird survey is recommended between February 1 and August 31, prior to vegetation removal or ground disturbance (ESA, 2026).

IMPACT ANALYSIS

IV.a) ***Less Than Significant with Mitigation Incorporated.*** As described in the Biological Report, no special-status plants were observed during the Site reconnaissance and the disturbed graded conditions make the Site unlikely to support rare plants. Limited suitable habitat is also present to support special-status wildlife species. No mature trees are present to support raptor nests or bat roosts (ESA, 2026). Under the Project, installation of a new 36-inch culvert extension from the west through the ephemeral drainage would carry runoff from upstream (off-site) under the proposed road and outlet to the east; however, per the Biological Report, the ephemeral drainage has limited potential for amphibians (ESA, 2026).

Although vegetation is currently limited on-site, prior to the start of construction, the sparse grassland has the potential to grow to a level that may provide nesting habitat for small migratory birds. As such, the Project may have the potential to result in disturbance to nesting birds if construction occurs during the breeding season (generally February – August). However, in accordance with the recommendations of the Biological Report and pursuant to Mitigation Measure BIO-1, preconstruction nesting bird surveys are to occur prior to vegetation removal or ground disturbance should such activities be proposed to occur during the nesting season. With implementation of Mitigation Measure BIO-1, impacts to special-status species would be less than significant.

IV.b-c) ***Less Than Significant with Mitigation Incorporated.*** As discussed above, the study area does not support intact sensitive natural communities. However, the adjacent ephemeral drainage does support limited riparian vegetation (ESA, 2026). As previously described, a 2020 Aquatic Resources Delineation concluded the drainage is not likely to qualify as a jurisdictional water of the U.S. but has the potential to be considered a water of the State and a stream by CDFW (ESA, 2026). As a result, any disturbance to the drainage would likely require permits and/or approval from CDFW and the North Coast Regional Water Quality Control Board (RWQCB). Adherence to Mitigation Measure BIO-2, which includes permit acquisition

and adherence to agency-approved mitigation, as necessary, shall be required prior to any disturbance to this feature.

In addition, construction projects that would disturb more than one acre of land, such as the proposed Project, would be subject to the requirements of General Construction Activity Stormwater Permit (Construction General Permit Order 2009-0009-DWQ, also known as the CGP), which requires operators of such construction sites to implement stormwater controls and develop a Stormwater Pollution Prevention Plan (SWPPP) identifying specific Best Management Practices (BMPs) to be implemented during construction to minimize the amount of sediment and other pollutants associated with construction sites from being discharged in stormwater runoff. These BMPs may include, for example, erosion control measures such as limiting construction during the rainy season, limiting ground disturbance to the minimum necessary, and stabilizing disturbed soil areas as soon as feasible after construction is completed, and sediment control measures such as straw bales, fiber rolls, and/or silt fencing structure. Implementation of BMPs would assist in minimizing potential impacts to the drainage channel.

With mitigation incorporated, impacts would be less than significant.

IV.d) **Less Than Significant with Mitigation Incorporated.** The proposed Project would not impact the movement of any native resident or migratory fish, as the Site does not contain any waterways that support fish. According to the Biological Report (ESA, 2026), the Site is bound by Highway 101, Dutcher Creek Road, and existing developed with the ephemeral drainage having limited connectivity. No identified regional wildlife corridors pass through the Site. While common birds may forage on-Site, only small migratory birds would be likely candidates to use the Site for nesting opportunities. As such, with implementation of Mitigation Measure BIO-2 impacts, would be less than significant.

IV.e) **Less Than Significant Impact.** The City of Cloverdale does have an adopted Tree Preservation Ordinance under Title 18 (Zoning) of the CMC which applies to all zoning districts in the city relative to removal or relocation of protected trees. Protected trees as defined by Chapter 18.17 Section .050 (Protected Trees) includes many specific tree species however they are only counted if they have a diameter at breast height (DBH) of 24 inches or greater, heritage trees, all trees located within a riparian corridor, any tree required to be planted or preserved as environmental mitigation or condition of approval, and trees located in the public right-of-way (CMC, 2019). Although the Site contains some tree species identified as a Protected Tree including the valley oak (*Quercus lobata*) and the coast live oak (*Quercus agrifolia*), the Biological Report prepared by ESA describes these species as "sapplings" which would be considered to be less than 24 inches DBH. With this understanding, no protected trees as defined under the City of Cloverdale Tree Preservation Ordinance (2019), as codified in Chapter 18.17 *Tree Preservation* of the City's Municipal Code, were identified or described in the Biological Report (ESA, 2026). As such, a less than significant impact would occur.

IV.f) **No Impact.** There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans that apply to the Site. No impact would occur.

MITIGATION MEASURES

BIO-1: If construction activities begin during the nesting season (February 1 to August 31), a qualified biologist shall conduct a preconstruction survey for active nests in suitable nesting habitat within 500 feet of the construction area for nesting raptors and migratory birds. Areas adjacent to the Project area that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage

point. The survey shall be conducted by a qualified biologist no more than seven days prior to the onset of construction. If no active nests are identified during the pre-construction survey, no further mitigation is necessary. If at any time during the nesting season construction stops for a period of two weeks or longer, pre-construction surveys shall be conducted prior to construction resuming.

If active nests are found during the survey, the Project proponent shall implement mitigation measures to ensure that the species would not be adversely affected, which would include establishing a no-work buffer zone, as approved by the California Department of Fish and Wildlife (CDFW), around the active nest.

If active nests are found on or within 500 feet of the Project area, then the Project proponent shall establish no disturbance buffers for active nests of 150 feet for small migratory bird species and 250 feet, or as specified, for raptors and larger birds, until the breeding season has ended, or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

If construction activity is required within the buffer, the nest(s) shall be monitored by a qualified biologist during all construction activities. If the biologist determines that the activity would impact the nest, the biologist shall have the authority to stop work. If the activity is determined to not be disturbing nesting activity, it may continue under supervision of the biologist. Completion of nesting and fledging activities shall be determined by the qualified biologist.

BIO-2: Due to the potential for impacts to potentially jurisdictional waters by the Project, a Section 404 CWA permit through the U.S. Army Corps of Engineers (USACE), a Section 401 Water Quality Certification from the North Coast Regional Water Quality Control Board (NCRWQCB), and a Section 1602 Streambed Alteration Agreement from the California Department of Fish and Wildlife (CDFW) must be obtained, if required. These permits shall be obtained prior to issuance of grading permits and implementation of the Project. The Applicant shall design the Project such that it will not result in a loss of water of the United States or wetlands, by providing mitigation through impact avoidance, impact minimization, and/or compensatory mitigation for the impact, as determined by the resource agencies. If it is determined, through obtaining an Approved Jurisdictional Determination, that the aquatic resource features on the Site are not jurisdictional under the federal Clean Water Act, the Section 404 CWA permit shall not be required. Prior to submitting the relevant resource agency permits, the Applicant shall determine the extent of the impact on jurisdictional waters and propose mitigation as follows, to be approved by the relevant resource agencies.

If compensatory mitigation is required, it may consist of: (1) obtaining credits from a mitigation bank; (2) making a payment to an in-lieu fee program that would conduct wetland, stream, or other aquatic resource restoration, creation, enhancement, or preservation activities; and/or (3) providing compensatory mitigation through an aquatic resource restoration, establishment, enhancement, and/or preservation activity. This final type of compensatory mitigation may be provided at or adjacent to the impact site (i.e., on-site mitigation) or at another location, usually within the same watershed as the permitted impact (i.e., off-site mitigation). The Project/Permit Applicant retains responsibility for the implementation and success of the mitigation Project.

Evidence of compliance with this mitigation measure shall be provided prior to initiating construction and grading activities for the Project.

FINDINGS

The proposed Project would have a **Less Than Significant Impact with Mitigation Incorporated** on Biological Resources.

V. CULTURAL RESOURCES. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

The Cultural Resources section identifies and evaluates a proposed project's potential impacts on significant cultural resources, which provide invaluable insights into past human activities and cultural development. These resources typically encompass archaeological resources (evidence of prehistoric and historic human occupation), historic resources (buildings, structures, objects, or sites significant under criteria such as those of the California Register of Historical Resources, defined in Public Resources Code [PRC] Section 5024.1), and Tribal Cultural Resources (TCRs). In accordance with PRC Section 5024.1(c)(1-4), a resource is considered historically significant if it retains "substantial integrity" and meets at least one of the following criteria: 1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; 2) Is associated with the lives of persons important in our past; 3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; and/or 4) Has yielded, or may be likely to yield, information important in prehistory or history. Under the CEQA, a project can cause a significant environmental effect if it results in a substantial adverse change to the significance of historical resources (PRC Section 21084.1), archaeological resources, or TCRs.

The Applicant has defined the APE as the Project Site, shown on Figure 1 above. The APE is undeveloped but previously disturbed by the construction of Phase 1 of the Bi'du Khaale Housing Project. Furthermore, according to the U.S. National Park Service's (NPS) National Register of Historic Places (NRHP), there are several listed historic places within Sonoma County; however, the APE contains no structures and as such there are no listed or eligible for listing structures in the APE.

Native American Heritage Commission Outreach

On December 9, 2025, the City contacted the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and the contact information for the representatives of the Native American tribes associated with the Project area. A response was received from the NAHC on the same day (December 9, 2025), which indicated that the results of the Sacred Lands File (SLF) search were positive and recommended contacting the Mishewal-Wappo Tribe of Alexander Valley for additional information. Included with the letter was a Native American contact list of tribes who may have knowledge of cultural resources in the Project area. A total of 24 Native American tribes were included on the NAHC contact list, which includes representatives from the Big Valley Band of Pomo Indians of the Big Valley Rancheria, Cahto Tribe, Cloverdale Rancheria of Pomo Indians, Coyote Valley Band of Pomo Indians, Dry Creek Rancheria of Pomo Indians (Project Applicant), Elem Indian Colony Pomo Indians, Estom Yumeka Maidu Tribe of the Enterprise Rancheria, Federated Indians of Graton Rancheria, Guidiville Rancheria of California, Hopland Band of Pomo Indians, Kashia Band of Pomo Indians of the Stewarts Point Rancheria, Koi Nation of Northern California, Lytton Rancheria, Manchester Band of Pomo Indians of the Manchester Rancheria, Middletown

Rancheria of Pomo Indians of California, Mishewal-Wappo Tribe of Alexander Valley, Noyo River Indian Community, Pinoleville Pomo Nation, Potter Valley Tribe, Redwood Valley or Little River Band of Pomo Indians, Robinson Rancheria of Pomo Indians, Round Valley Reservation/Covelo Indian Community, Scotts Valley Band of Pomo, , and Yokayo Tribe.

Tribal Outreach

On December 11, December 15, December 16, and December 29, 2025, and January 5, January 6, January 8, and January 12, 2026, City staff sent a letter to 23 of the 24 tribes included on the Native American contact list received from the NAHC (excluding Dry Creek Rancheria, which is the Project Applicant) to inform them of the proposed development, results of the SLF search, and requested a response within 90 days if additional information was requested about the Project and/or to consult with the City. As of the date of this Initial Study, only one response was received from a representative of the Noyo River Indian Community, where it was indicated they have no input on the Project and are a Mendocino County Coastal Tribe. To date, no other responses have been received.

Cultural Resources Assessment

A *Cultural Resources Survey and Assessment* (Cultural Resources Survey) was completed by Environmental Science Associates (ESA) on January 25, 2021 (on file and confidential). The Cultural Resources Survey included the properties included under both Phase 1 and Phase 2 of the Project. As part of the Cultural Resources Survey, a records search was completed at the Northwest Information Center (NWIC) at the Sonoma State University campus in Rohnert Park, California to determine if known cultural resources have been recorded within the APE or within a 0.5-mile radius and assess the likelihood for unrecorded cultural resources to be present within the APE. No recorded prehistoric cultural resources, prehistoric archaeological sites, or previously recorded historic-era cultural resources are located within the APE. Although three resources have been identified within an approximately 0.1-mile radius of the APE, ESA determined that none of the resources would be impacted by the Project. Although ESA concluded the Project has a low potential to uncover archaeological resources, the inadvertent discovery of cultural materials and human remains during ground disturbing activities has the potential to occur. As a result, ESA recommended inclusion of the inadvertent discovery protocol, which includes standard protocol to follow in the event such resources are encountered during development of the Project; see Mitigation Measure CUL-1, below (ESA, 2021).

IMPACT ANALYSIS

V.a-c) Less Than Significant with Mitigation Incorporated. The Applicant has defined the APE as the Project Site, shown on Figure 1 above. The APE is undeveloped but previously disturbed by Phase 1 of the Project. There are no structures in the APE, as such, no structures are listed or eligible for listing on the NRHP.

As noted above, in December 2025 and January 2026, the City invited the Native American tribes included on the NAHC contact list (with the exception of the Dry Creek Rancheria, the Project Applicant) to consult on the Project pursuant to Assembly 52. To date, only one response was received from a representative of the Noyo River Indian Community, where it was indicated they have no input on the Project and are a Mendocino County Coastal Tribe. As of the date of this Initial Study, no other responses have been received.

Due to the lack of historic properties identified in the APE, previous disturbance at the Site, and low potential to uncover archaeological resources, as concluded by the 2021 Cultural Resources Study (ESA, 2021), it is not anticipated that the Project would affect historical and/or archaeological resources. However, there is a chance that historical and/or archaeological resources may be inadvertently discovered during construction. A standard condition, incorporated as Mitigation Measure CUL-1, below, is recommended in

the event an archaeological or cultural resource is inadvertently discovered during Project construction. A less than significant impact with mitigation incorporated would occur.

MITIGATION MEASURES

CUL-1: In the event that grading or other ground disturbance activities associated with Project construction uncover any bones, pottery fragments or other potential cultural resources, the developer or their supervising contractor shall cease all work within 100 feet of the area of the find and notify the Planning & Community Development Department at (707) 849-2521. A professional archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology and who is familiar with the archaeological record of Sonoma County, shall be retained by the developer to evaluate the significance of the find. Planning & Community Development Department staff shall notify the culturally affiliated if the find is determined to be of pre-historic origin. Site work shall not resume until the archaeologist conducts sufficient research, testing and analysis of the archaeological evidence to make a determination that the resource is either not cultural in origin or not potentially significant. If a potentially significant resource is encountered, the archaeologist shall prepare a mitigation plan for review and approval by the Planning & Community Development Department, including recommendations for total data recovery, Tribal monitoring, disposition protocol, or avoidance, if applicable. All measures determined by the Community Development Director to be appropriate shall be implemented pursuant to the terms of the archaeologist's report. The preceding requirement shall be incorporated into construction contracts and documents to ensure contractor knowledge and responsibility for the proper implementation.

FINDINGS

The proposed Project would have a **Less Than Significant Impact with Mitigation Incorporated** on Cultural Resources.

VI. ENERGY. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

On October 7, 2015, Governor Edmund G. Brown, Jr. signed into law Senate Bill (SB) 350, known as the Clean Energy and Pollution Reduction Act of 2015 (De León, Chapter 547, Statutes of 2015), which sets ambitious annual targets for energy efficiency and renewable electricity aimed at reducing greenhouse gas (GHG) emissions. SB 350 requires the CEC to establish annual energy efficiency targets that will achieve a cumulative doubling of statewide energy efficiency savings and demand reductions in electricity and natural gas final end uses by January 1, 2030. This mandate is one of the primary measures to help the State achieve its long-term climate goal of reducing GHG emissions to 40 percent below 1990 levels by 2030. The proposed SB 350 doubling target for electricity increases from 7,286 gigawatt hours (GWh) in 2015 up to 82,870 GWh in 2029. For natural gas, the proposed SB 350 doubling target increases from 42 million of therms (MM) in 2015 up to 1,174 MM in 2029 (CEC, 2017).

Construction on-site, including construction of the proposed all-electric 53-unit affordable housing units, Wellness Center, and associated development, would be subject to Part 6 (California Energy Code) of Title 24 of the California Code of Regulations, which contains energy conservation standards applicable to residential and non-residential buildings throughout California. The most current version is the 2025 Energy Code, which went into effect on January 1, 2026. The Building Energy Efficiency Standards are designed to ensure new and existing buildings achieve energy efficiency and preserve outdoor and indoor environmental quality.

IMPACT ANALYSIS

VI.a-b) **Less Than Significant Impact.** The proposed Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during Project construction or operation, nor would the Project conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

The consumption of energy would occur during construction through the use of fossil fuels and electricity in construction equipment and vehicles. Construction would occur during normal business hours, typically 7:00 am to 7:00 pm, Monday through Saturday, and would be temporary in nature. The contractor would keep all construction equipment in good working order and would limit idling of vehicles and equipment during construction, in accordance with California Code of Regulations, Title 13, Section 2485: *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling* (adopted 2005), which limits idling from both on-road and off-road diesel-powered equipment with a gross vehicle weight rating of greater than 10,000 pounds and is enforced by the California Air Resources Board (CARB). Therefore, it is anticipated that the construction phase of the Project would not result in wasteful, inefficient, and unnecessary consumption of energy.

Operation of the Project would be subject to Part 6 (California Energy Code) of Title 24 of the California Code of Regulations, which contains energy conservation standards applicable to residential and non-residential buildings throughout California to ensure new and existing buildings achieve energy efficiency and preserve outdoor and indoor environmental quality. Additionally, the buildings are being designed to accommodate roof mounted photovoltaic panels. Since the proposed Project would be designed and developed in accordance with the requirements contained in the California Energy Code, operation of the Project would not result in wasteful inefficient, and unnecessary consumption of energy.

As construction and operation of the Project would comply with the relevant state and local plans, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. A less than significant impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Energy.

VII. GEOLOGY AND SOILS. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

The Site is located within the southern portion of the City of Cloverdale, Sonoma County, within the Coast Range geomorphic province of California, an area of high seismic activity. The Site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known active or potentially active faults traverse the property. The nearest active faults include the Maacama Fault Zone, located approximately 5 miles northeast of the Site, and the Rodgers Creek Fault Zone, located approximately 15 miles to the south. Both are recognized by the California Geological Survey as active fault systems capable of generating significant ground shaking (California Geological Survey, 2022). Accordingly, like all development in the region, the Site would be subject to strong seismic shaking during a major earthquake.

According to the NRCS Web Soil Survey (as previously discussed), five soils are mapped within the Site (NRCS, 2025):

- Clear Lake clay, sandy substratum, 2–5% slopes (CeB) — 38 percent of the Site.
- Positas gravelly loam, 0–9% slopes (PsC) — 27 percent of the Site.
- Laughlin loam, 30–50% slopes (LgF) — 16 percent of the Site.
- Suther loam, 30–50% slopes (StF) — 11 percent of the Site.
- Laughlin loam, 50–75% slopes (LgG) — 8 percent of the Site.

These soils generally consist of clays and loams with moderate shrink–swell potential and moderate erodibility. The flatter soils (Clear Lake clay and Positas gravelly loam) dominate the central portions of the Site, while the Laughlin and Suther loams are concentrated along the steeper slopes to the south and east (NRCS, 2025).

From a geotechnical standpoint, several potential concerns may affect Project design and construction:

1. Seismic Hazards: The Site may be subject to strong seismic shaking given its proximity to active regional faults.
2. Soil Stability: Although the subject Site is relatively flat, steeper slopes are located within the vicinity of the Site, particularly to the south and west (up to 75 percent slopes), present a higher risk of localized instability and landslides near the Site.
3. Soil Erosion: Moderate erodibility ratings and sparse existing vegetation indicate the potential for surface erosion during on-site grading activities.
4. Expansive Soils: Clay-rich soils such as Clear Lake clay have moderate shrink–swell potential, which could pose a risk to foundations if not engineered appropriately.
5. Septic Suitability: All mapped soils are rated “very limited” for septic tank absorption fields due to slope and slow percolation. However, the Project would connect to the City of Cloverdale municipal sewer system, and no on-site septic systems are proposed.

No unique geologic features or known paleontological resources are identified on the Site. The Project area consists of disturbed ground with sparse vegetation and no evidence of fossils or significant geologic landforms.

A *Soil Engineering Consultation and Report Update* (Soils Report) was prepared by Reese and Associates, Inc. on July 17, 2025 (see Appendix G) to assess the soil conditions at the current Site. Seven additional test pits were performed. The report notes that the Site was previously used as a soil stockpile area, which resulted in placement of imported fill on-site. The test pits indicate that the imported fill extends to depths of approximately 5 to 9.5 feet below ground surface and comprises stiff to very stiff sandy clay with gravel and sandy silts of low expansion potential. The Soils Report concluded that the general conclusions and recommendations included in the original soil investigation report for Phase I of the Project in August 2019 would still be applicable to Phase 2 (current project) (Reese, 2025). Specific recommendations pertaining to site grading and seismic design are also provided and shall be adhered to during Project design and construction.

The proposed Project, and any subsequent development consistent with the General Plan Amendment and Rezone, would be required to comply with the latest California Building Code (CBC) requirements for earthquake-resistant construction, foundation design, grading, and site preparation. In addition, since the Project would span more than one acre, construction would be subject to the Statewide Construction General Permit, which requires implementation of a Stormwater Pollution Prevention Plan (SWPPP) with Best Management Practices (BMPs) to reduce erosion and control stormwater runoff. With these standard regulatory requirements, potential impacts related to geology and soils would be reduced to less than significant.

IMPACT ANALYSIS

VII.a.i) ***Less Than Significant Impact***. The Site is not located within an Alquist-Priolo Earthquake Fault Zone and no active or potentially active faults traverse the property (CGS, 2022). The nearest active fault zones are the Maacama Fault, approximately 5 miles northeast, and the Rodgers Creek Fault, approximately 15 miles south. Because no known faults cross the Site, the potential for surface rupture is low. Development of the Project

would not increase this hazard, as construction does not introduce new faulting potential. A less than significant impact would occur.

VII.a.ii) **Less Than Significant Impact.** The Site is located in the northern Coast Ranges, a seismically active region where strong ground shaking is likely to occur during a major earthquake on nearby active faults. While the Project would introduce residential and commercial uses to the Site, all proposed structures would be designed and constructed in accordance with the most recent CBC, which includes seismic safety standards to reduce risks to life and property. Therefore, while Project development would introduce additional occupants who could be exposed to seismic shaking, compliance with CBC requirements would ensure that risks are reduced to levels considered acceptable in the region. A less than significant impact would occur.

VII.a.iii) **Less Than Significant Impact.** Liquefaction potential is generally associated with unconsolidated sandy soils, shallow groundwater, and seismic shaking. The NRCS Web Soil Survey indicates that soils on the Site consist of clay- and loam-dominated soils, including Clear Lake clay and Positas gravelly loam in flatter areas, and Laughlin and Suther loams along the margins (NRCS, 2025). These soils are moderately cohesive and not typically prone to liquefaction. No shallow groundwater has been documented on-site. Project construction would not increase the potential for liquefaction, as the soils' physical properties remain unchanged and no extensive dewatering or soil modification is proposed that would heighten susceptibility. Accordingly, the likelihood of liquefaction affecting the Site remains low. A less than significant impact would occur.

VII.a.iv) **Less Than Significant Impact.** NRCS mapping identifies soil units on the Site that are associated with regional slope classes up to 30–75 percent (e.g., Laughlin loam and Suther loam) (NRCS, 2025). However, these slope ratings describe the typical characteristics of the soil series across Sonoma County and do not necessarily reflect the actual topography at the Site. Field conditions at the subject Site (APN: 117-040-107) are generally flat to gently sloping and the Site is understood to be previously disturbed (not currently developed, however). No substantial steep slopes have been identified along the Site's boundaries, and the parcel does not contain features typically associated with landslide risk.

Because the Site is generally flat, development of the Project would not be exposed to significant landslide hazards. The Project would not increase the likelihood of landslides, and compliance with standard CBC requirements for grading and construction would further reduce risks. Therefore, the potential for landslide-related impacts is considered less than significant.

VII.b) **Less Than Significant Impact.** The Site consists primarily of Clear Lake clay (38 percent) and Positas gravelly loam (27 percent), with smaller portions of Laughlin loam and Suther loam (NRCS, 2025). These soils exhibit moderate erodibility. NRCS tolerable soil loss (T factor)⁴ ratings are between 3 and 5 tons/acre/year, which indicates that soils could be susceptible to erosion if left disturbed without controls. However, the Site is generally flat to gently sloping and topographic conditions do not inherently promote high erosion potential.

⁴ Tolerable soil loss rating, or T factor, is defined as the maximum annual rate of erosion (by wind or water) that allows for sustained economic crop productivity, typically ranging from 1 to 5 tons per acre per year, with deeper soils generally having higher tolerance.

Project implementation would involve grading, excavation, and other ground-disturbing activities during construction. These activities could temporarily increase erosion potential and the potential for loss of topsoil, particularly if protective vegetation is removed. However, the Project would be subject to both local and State regulations regarding environmental protections, including Chapter 16.10 (Storm Water) of the Cloverdale Municipal Code (City of Cloverdale, 2024), which regulates stormwater discharges within the City, and the Statewide Construction General Permit (SWRCB, 2023), which requires preparation and implementation of a SWPPP. The SWPPP must include BMPs, such as silt fencing, fiber rolls, stabilized construction entrances, erosion control blankets, and revegetation of disturbed areas, to minimize erosion and control sediment transport. Once construction is complete, the Site would be stabilized with buildings, paved surfaces, landscaping, and stormwater treatment features (bioswales and rain gardens), which would further minimize the potential for long-term soil erosion.

Therefore, while the Project would temporarily increase the potential for soil erosion during construction, compliance with local and State stormwater regulations and mandatory BMPs would ensure that impacts are less than significant.

VII.c) **Less Than Significant Impact.** As previously described, the Site is underlain by soils mapped as Clear Lake clay (38 percent), Positas gravelly loam (27 percent), Laughlin loam (16 percent), Suther loam (11 percent), and Laughlin loam (8 percent). These soils are generally cohesive and moderately erodible (NRCS, 2025). While some mapped soil units are associated with regional slope classes up to 30–75 percent, actual Site conditions are flat to gently sloping, and the parcel does not contain substantial steep slopes. As a result, the risk of landslides or slope instability is considered low.

Lateral spreading is typically associated with liquefaction-susceptible soils and the presence of shallow groundwater. The clay- and loam-dominated soils present on the Site are not typically prone to liquefaction. Therefore, the potential for lateral spreading is considered low.

Ground subsidence is not anticipated, as the Site is not located within a region of historical subsidence and no large-scale groundwater extraction or compressible peat deposits are present.

Collapse potential is also considered low. While the Site has been previously disturbed during Phase 1 project construction activities, it does not contain extensive undocumented fill or unconsolidated geologic units that would be expected to collapse under load.

The proposed Project would introduce residential and commercial development to the Site, thereby increasing the number of people and structures present. However, the Site's flat topography, absence of shallow groundwater, and cohesive soils indicate that hazards related to unstable soils are low. Furthermore, the Project would be required to comply with CBC requirements for grading, foundation design, and site preparation, which are specifically intended to address soil stability concerns. Accordingly, development of the Project would not result in or exacerbate hazards related to unstable soils and potential impacts would be less than significant.

VII.d) **Less Than Significant Impact.** Expansive soils contain clay minerals that shrink and swell with seasonal changes in moisture content, which can cause movement in building foundations, slabs, and pavements if not properly engineered. According to the NRCS Web Soil Survey, soils mapped on the Site include Clear Lake clay (38 percent) and Positas gravelly loam (27 percent), both of which exhibit moderate shrink–swell potential (NRCS, 2025). These soils dominate the flatter central portions of the Site where development is

proposed. The smaller areas of Laughlin and Suther loams present along the parcel's margins are less likely to influence foundation conditions because they are outside the primary development footprint.

The presence of clay-rich soils indicates that some risk of expansive soil conditions exists. However, expansive soils are a common condition in Sonoma County and throughout much of California, and the CBC requires site-specific geotechnical evaluation and the use of engineered foundation systems (e.g., reinforced slabs, post-tensioned slabs, or deepened footings) to account for soil shrink–swell potential.

By introducing residential and commercial uses, the Project would increase the number of structures that could be affected by expansive soils. However, compliance with CBC design requirements would ensure that risks to life or property from expansive soils would be minimized. Therefore, the Project would not exacerbate expansive soil hazards and impacts would be less than significant.

VII.e) **No Impact Impact.** The Project would be served by community water and sanitary sewer systems. The City of Cloverdale would provide potable water service for both fire protection and domestic water needs, as well as wastewater and stormwater service. Water and sewer mains would be extended into the Site and connected to existing municipal infrastructure. Once constructed, the Project would discharge wastewater into the City's sanitary sewer collection system for treatment at the City's wastewater treatment facility.

According to the NRCS Web Soil Survey, all soils mapped within the Site — including Clear Lake clay, Positas gravelly loam, Laughlin loam, and Suther loam — are rated “very limited” for septic tank absorption fields due to slow percolation, shrink–swell potential, and slope limitations (NRCS, 2025). While this indicates that the Site's soils would not be suitable for large-scale septic disposal systems, this constraint is not applicable because the Project would not use on-site septic systems.

By connecting to the municipal water and sewer system, the Project avoids reliance on septic systems entirely, and, therefore, the presence of soils with poor percolation characteristics does not represent a constraint. The Project would not increase impacts related to wastewater disposal capacity or septic system suitability. No impact would occur.

VII.f) **Less Than Significant Impact.** The Site is generally characterized as previously disturbed land with relatively flat topography and clay- and loam-dominated soils (NRCS, 2025). No unique geologic features are known to occur on the Site and the parcel is not mapped within an area identified by the City of Cloverdale General Plan or regional databases as sensitive for paleontological resources. Because of past ground disturbance and the absence of mapped sensitive formations, the potential for paleontological resources to occur on-site is considered low. A less than significant impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Geology and Soils.

VIII. GREENHOUSE GAS EMISSIONS. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions (GHG), either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

The Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32, is a State law that establishes a comprehensive program to reduce GHG emissions from all sources throughout the State. AB 32 required the State to reduce its total GHG emissions to 1990 levels by 2020, a reduction of approximately 15 percent below emissions expected under a “business as usual” scenario. The 2020 GHG emissions statewide limit set by AB 32, equal to the 1990 level, was 431 million metric tons of carbon dioxide equivalent (MMTCo_{2e}) (CARB, 2025[e]). In addition, pursuant to Executive Order S-3-05 (2005) and Senate Bill (SB) 32 (2016), California has a reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. CARB reports that the State is on track to reduce statewide GHG emissions to the 2030 target (40 percent below 1990 levels) and is also striving to achieve carbon neutrality by 2045 or earlier. Additional key bills and policies in the State which address climate change are summarized below (CARB, 2025[b]):

Assembly Bills and Senate Bills:

- Assembly Bill 1493 (– GHG Standards for Passenger Vehicles)
- Senate Bill 375 – Sustainable Communities
- Senate Bill X1-2 – Renewables Portfolio Standard
- Assembly Bill 341 – Commercial Recycling
- Senate Bill 535 – Disadvantaged Communities

Governor's Executive Orders:

- Governor's Executive Order S-3-05 – 2050 GHG Reduction Goal
- Governor's Executive Order B-16-12 – Goal for Plug-In Vehicles
- Governor's Executive Order B-18-12 – Energy Efficiency of State-Owned Buildings
- Governor's Executive Order B-30-15 – GHG reduction target of 40 percent below 1990 levels by 2030
- Governor's Executive order B-55-18 – Achieve Carbon Neutrality by 2045

Under AB 32, CARB was required to develop a Scoping Plan identifying how California will reduce its GHG emissions to achieve established targets. The Scoping Plan was first approved in 2008 and is required to be updated at least every 5 years (CARB, 2025[b]). The *Draft 2022 Scoping Plan Update* was released for public review on May 10, 2022, and was finalized on November 16, 2022. The final *2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan)* assesses the State's progress in achieving the 2030 statutory targets, while also presenting a plan for the State to reach carbon neutrality by 2045 or earlier.⁵

⁵ The CARB 2022 Scoping Plan is available for review at: <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents>.

Health and Safety Code Section 38505 identifies seven (7) GHGs that the CARB is responsible for monitoring and regulating in order to reduce emissions, including: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and nitrogen trifluoride (NF₃). CO₂ is the primary GHG emitted in California (CARB, 2025[f]) and accounted for approximately 81 percent of total GHG emissions in 2021 (OEHHA, 2025).

CARB, in its *California Greenhouse Gas Emissions for 2000 to 2022 Report (2024)*, states that GHG emissions within the State of California have generally followed a declining trend since the peak in 2004. In 2022, statewide GHG emissions were 371.1 million metric tons of CO₂ equivalent (MMTCo₂e), 9.3 MMTCo₂e lower than 2021 levels (380.4 MMTCo₂e) and 59.9 MMTCo₂e below the 2020 statewide GHG limit of 431 MMTCo₂e. Notably, State GHG emissions dropped below the 2020 GHG limit in 2014 and have remained below since that time (CARB, 2024). The transportation section remains the largest source of GHG emissions in the State, accounting for approximately 39 percent of the State's GHG emissions in 2020. As shown in Table 7 below, the transportation section remains the largest source of GHG emissions in the State, accounting for approximately 39 percent of the State's GHG emissions in 2022 (CARB, 2025[d]).

Table 7. California's GHG Emissions by Economic Sector in 2022

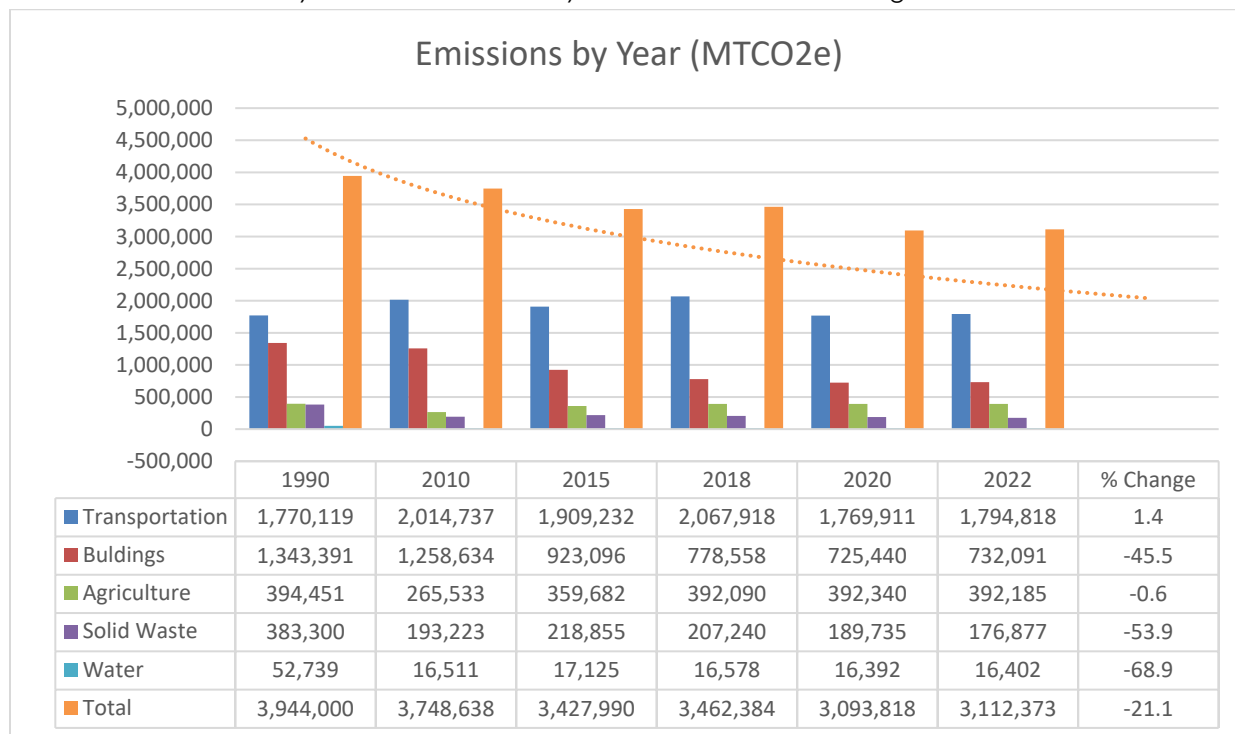
Economic Sector	Percentage of California's Total GHG Emissions (2022)
Transportation	39%
Industrial	23%
Electricity	16%
Agriculture & Forestry	8%
Residential	8%
Commercial	6%
Total	100%

Source: California Air Resources Board (CARB), 2025[d].

The Site is located within the North Coast Air Basin (NCAB) and is subject to Northern Sonoma County Air Pollution Control District (NoSoCoAir) requirements. The NoSoCoAir is responsible for monitoring and enforcing federal, State, and local air quality standards in northern Sonoma County. The Sonoma County Regional Climate Protection Authority (RCPA), through the Climate Action 2020 project, "has evaluated historic, baseline, and future [GHG] emissions in Sonoma County based on internationally accepted community scale protocols and locally specific emissions data." The County has a goal of reducing GHG emissions 25 percent below 1990 levels by 2020 and 80 percent below 1990 levels by 2050.

A 2022 update to the *Sonoma County Greenhouse Gas Inventory (2022 GHG Inventory Update)* was completed to help track progress towards achieving the short- and long-term emissions reduction goals. Per the 2022 GHG Inventory Update, Sonoma County did not reach its countywide reduction goal of 25 percent below 1990 levels achieving an approximately 21.6 percent below 1990 levels in 2020. Additionally, with the adoption of the Sonoma Climate Mobilization Strategy in March 2021, the GHG emission goals for 2030 were further modified, setting a new goal for Sonoma County to achieve carbon neutrality by 2030 which is considerably more ambitious than the original goal of a 40 percent reduction of GHG emissions based on 1990 emissions levels. To meet the 2030 target of 80 percent below 1990 emissions (~3.2 million MTCO₂e), the County must reduce emissions at a faster rate than it achieved between 1990 and 2022 (RCPA, 2024). A table comparing source-specific emission levels between 1990 and 2022 is provided in Table 8, below. The transportation sector accounts for the largest proportion of the recorded GHG emissions.

Table 8. 1990-2022 Countywide GHG Emissions by Source and Percent Change



Source: RCPA, 2024.

The *Sonoma County Regional Climate Action Plan 2020 and Beyond (CAP)*, prepared by the RCPA in July 2016, applies to the County and participating cities, including the City of Cloverdale. Pursuant to Resolution No. 001-2018 adopted January 9, 2018, the City of Cloverdale reaffirmed its intent to reduce greenhouse gas emissions as part of a coordinated effort through the RCPA and to adopt local implementation measures identified in the CAP. Subsequently, on September 11, 2019, the City of Cloverdale adopted Resolution No. 91-2019 declaring a climate emergency and adopting immediate emergency mobilization actions to restore a safe climate and achieve zero net carbon emissions by 2030.

As stated in the CAP's Executive Summary, "given the magnitude of human-induced climate change and the projected catastrophic effects from continued global warming, reducing GHG emissions has become an environmental and societal imperative" (RCPA, 2016). Numerous State, regional, and local GHG reduction measures are included in the CAP to help aid the County in achieving its GHG reduction goal. The CAP also includes GHG emissions inventories and forecasted estimates for the City of Cloverdale. In 2010, the City's total GHG emissions were 59,040 metric tons of carbon dioxide equivalent (MTCO_{2e}), which equates to approximately 2 percent of the County's total GHG emissions for the same year and an approximately 3 percent increase from estimated 1990 emission levels. Table 9, below, provides the City's inventoried and estimated GHG emissions from 1990 and 2050. On-road transportation currently and is estimated to continue to account for approximately two-thirds of the City's overall GHG emissions.

Table 9. City of Cloverdale Inventoried and Estimated Emissions, 1990-2050

Source	1990 Backcast		2010 Inventory		2015 Forecast		2020 Forecast		2040 Forecast		2050 Forecast	
Building Energy	12,920	23%	17,990	30%	20,880	30%	22,250	30%	25,450	27%	26,840	29%
On-road Transportation	36,510	64%	37,270	63%	44,160	64%	46,380	63%	61,310	66%	60,200	64%
Off-road Transportation and Equipment	610	1%	860	1%	1,090	2%	1,320	2%	2,560	3%	2,690	3%
Solid Waste	6,550	11%	2,140	4%	2,390	3%	2,540	3%	2,880	3%	3,030	3%
Wastewater Treatment	420	1%	740	1.3%	770	1%	810	1%	940	1%	1,000	1%
Water Conveyance	320	1%	30	0.1%	40	0%	40	0%	40	0%	50	0%
Total	57,330	100%	59,040	100%	69,320	100%	73,340	100%	93,170	100%	93,790	100%
Per-Capita Emissions	11.6		6.9		7.7		7.8		8.5		8.1	

Source: RCPA, 2016.

The NoSoCoAir has not developed its own guidance to assist in the evaluation of greenhouse gas emissions for projects proposed within the NCAB and therefore recommends using the thresholds and mitigation measures of the Bay Area Air Quality Management District (BAAQMD) California Environmental Quality Act Air Quality Guidelines (BAAQMD CEQA Guidelines). The BAAQMD CEQA Guidelines provide project-level significant thresholds for use in determining the Project's potential GHG impacts. The BAAQMD recommends that the thresholds of significant for operational-related GHG emissions for land use development projects are compliance with a qualified GHG Reduction Strategy; or annual emissions less than 1,100 metric tons per year (MT/yr) of CO₂e; or 4.6 MT CO₂e/SP/yr (residents + employees). It should be noted that BAAQMD does not have a recommended threshold of significance for construction-related impacts; however, construction-related GHG emissions for the Project were quantified in accordance with BAAQMD recommendations.

The California Emissions Estimator Model (CalEEMod) was utilized to quantify potential criteria pollutant and GHG emissions associated with construction and operation of the Project. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. Further, the model identifies mitigation measures to reduce criteria pollutants and GHG emissions along with calculating the benefits achieved from measures chosen by the user (CalEEMod). The results of the CalEEMod analysis in their entirety are included in Appendix E, with generalized construction, operational, and mobile emissions presented in Table 10, below.

Table 10. Construction, Operational, and Mobile Greenhouse Gas Emissions of the Proposed Bi'du Khaale Phase 2 Affordable Housing Project

Emission Category	CO ₂ e Emissions (MTCO ₂ e/year)
Construction ^{1, 2}	272
Operational ³	636
Excluding Mobile Sources	220
Mobile ⁴	416

Notes:

CO₂e= Carbon Dioxide Equivalent

¹= Analysis assumes an approximately two-year construction period (approximately December 2027 – December 2029). Once construction of the proposed project is completed, construction emissions would cease at the Site and only operational emissions would be anticipated at the Site.

²= Only unmitigated construction emissions are provided in order to present the maximum construction-related emissions anticipated under the proposed Project.

³= Only unmitigated operational emissions are provided in order to present the maximum operational emissions anticipated under the proposed Project.

⁴= CalEEMod calculates "Mobile sources" as part of the Operational emissions. In this case, the numbers were separated to differentiate the anticipated emissions associated with operation of the proposed Project itself and those of residents' and visitors' vehicles. Source: CalEEMod Model Results, September 16, 2025. (Appendix E)

According to the CalEEMod results for the Project and future potential development, as shown above, construction (unmitigated) of the proposed Project would result in a maximum of approximately 272 MTCO₂e per year over the anticipated construction period. Unmitigated operational emissions for the proposed Project are anticipated to be approximately 636 MTCO₂e per year, while implementation of standard mitigation measures would be anticipated to reduce operational emissions to approximately 635 MTCO₂e per year, a reduction of 0.5 percent. It is anticipated that mobile emissions would account for approximately 65 percent of the Project's total anticipated operational emissions. It should be noted that the GHG analysis of operational emissions is an overestimation of actual project emissions associated with operational energy consumption, as it includes emissions that would otherwise be forgone through compliance with the residential solar requirements established under California Code of Regulations, Title 24, Part 6, Subchapter 8 – Low-Rise Residential Buildings (2016). Compared to the emission amounts provided in the Table 10, above, construction and operation of the Project would account for approximately 0.001 and 0.002 percent of the County's total GHG emissions recorded in 2022.

IMPACT ANALYSIS

VIII.a) **Less Than Significant Impact.** The Project would have a less than significant impact on greenhouse gas (GHG) emissions as neither construction nor operation of the Project would generate significant amounts of GHGs and anticipated operational-related GHG emissions would be below the threshold of significance established by the BAAQMD. Since development is proposed on-site, increased GHG emissions from construction and operation of the Project, as well as mobile sources traveling to and from the Site, in the vicinity of the Site would be anticipated as result of the Project. However, as described in Section III (Air Quality), above, the proposed Project would require compliance with the standards and regulations of the NoSoCoAir, including maintaining all construction equipment in good working condition. In addition, the Project would be subject to Title 24 energy efficiency standards. Energy efficient buildings require less electricity, and, as a result, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The Project would comply with the California Green Building Standards Code, which includes requirements to increase recycling, reduce waste, reduce water use, increase bicycle use, and other measures that would reduce GHG emissions. Motor vehicle emissions associated with the Project would be

reduced through compliance with State regulations, which include the Pavley fuel efficiency standards that require manufacturers to meet increasing stringent fuel mileage rates for vehicles sold in California and the Low Carbon Fuel Standard that requires reductions in the average carbon content of motor vehicle fuels. Through compliance with these standards, potential GHG emissions associated with the proposed Project would be reduced.

Additionally, as noted above, construction and operation of the proposed residential development would result in approximately 272 and 636 MTCO_{2e} per year, respectively, both of which would account for less than one percent of the County's total GHG emissions recorded in 2022 and annual operational emissions are anticipated to be below the BAAQMD threshold of 1,100 MTCO_{2e} per year. It should be noted that although a construction emission threshold has not been established by the BAAQMD, adding the construction and operational emissions would still be below the recommended operational threshold of 1,100 MTCO_{2e} per year. A less than significant impact would occur.

VIII.b) **Less Than Significant Impact.** The proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. As discussed above, the County has a goal of reducing GHG emissions 80 percent below 1990 levels by 2030, which exceeds the requirement of a 15 percent established under AB 32, and 80 percent below 1990 levels by 2050. Several plans and policies are utilized by the County and City of Cloverdale to help achieve this goal, including the Sonoma County CAP (2016) and the City of Cloverdale General Plan (2009, amended 2015), which contain goals and policies directly related to reducing GHG emissions. As noted in Section 5.1 of the CAP (2016), the City of Cloverdale General Plan contains various policies that help to reduce GHG emissions. Of the City of Cloverdale General Plan (2009, amended 2015) policies provided in the CAP (2016), those applicable to the proposed Project include Policy 8-2, which seeks to use, support, and encourage energy and resource efficient methods in private construction; Policy CE 3-1, which seeks to provide an extensive network of pedestrian and bicycle pathways; Policy CDO 6-2, which seeks to protect distinctive vegetation; Policy CDO 6-1, which seeks to maintain and expand the tree canopy within and outside the developed areas of the City. Additionally, as noted in the CAP (2016), the City of Cloverdale has established a Water Efficient Landscape Ordinance (Municipal Code Chapter 15.30) and has adopted the California Green Building Standards Code, making the Tier 1 Voluntary measures for residential and non-residential structures mandatory requirements. The California Green Building Standards Code includes requirements to increase recycling, reduce waste, reduce water use, increase bicycle use, and other measures that would reduce GHG emissions.

The proposed Project includes the construction of sidewalks along Road B that would serve to contribute to implementation of Policy CE 3-2. The Project also would include street and pedestrian-scale lighting designed to be Dark Sky-compliant and landscaping using native and drought-tolerant species which would help with implementation of Urban Lighting Policies UL 1-1, UL 1-2, UL 1-5, and Conservation, Design, and Open Space Policy CDO 6-7 respectively. The proposed landscaping would be required to comply with the requirements of the City of Cloverdale Water Efficient Landscape Ordinance. In addition, in support of Policy 8-2, the Project would be subject to Title 24 energy efficiency standards and the California Green Building Standards Code, as required by the City of Cloverdale. Energy efficient buildings require less electricity, and, as a result, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. Additionally, the Project proposes the installation and use of Solar Pannels to generate and provide electricity to the residential units providing an off grid renewable source of energy. Additionally, the Applicant has indicated that they are pursuing a partnership with Sonoma County Transit to submit for the Affordable Housing and Sustainable Communities (AHSC) program in order to increase the frequency of Route 60 and 68 bus services by purchasing additional electrical buses and construct bus charging infrastructure. With on-road transportation

comprising approximately two-thirds of the City's GHG emissions, increasing transit ridership would help reduce the number of vehicles on the road, which, in turn, would minimize GHG emissions.

As the Project would help to implement the applicable City of Cloverdale General Plan policies and local ordinances and regulations provided in the CAP (2016) for the City of Cloverdale, the Project would be consistent with the CAP and would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. A less than significant impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Greenhouse Gas Emissions.

IX. HAZARDS AND HAZARDOUS MATERIALS. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, State, or local agency, or has characteristics defined as hazardous by a federal, State, or local agency. Chemical and physical properties such as toxicity, ignitability, corrosiveness, and reactivity cause a substance to be considered hazardous. These properties are defined in the California Code of Regulations (CCR), Title 22, §§66261.20–66261.24. A “hazardous waste” includes any hazardous material that is discarded, abandoned, or will be recycled. Therefore, the criteria that render a material hazardous also cause a waste to be classified as hazardous (California Health and Safety Code §25117, 2024).

The Cortese List (Government Code §65962.5) is a planning document used by the State, local agencies, and developers to comply with CEQA requirements by identifying sites that have known hazardous materials concerns. The Cortese List is maintained by the California Environmental Protection Agency (CalEPA) and is composed of data from several agencies, including the Department of Toxic Substances Control (DTSC) EnviroStor database and the State Water Resources Control Board (SWRCB) GeoTracker database (CalEPA, 2023).

A search of the DTSC EnviroStor database identified one site within approximately 0.5 miles of the Project Site: Cloverdale Wood Waste Landfill #1, which is listed as a historical site and has been referred to the North Coast Regional Water Quality Control Board for oversight (DTSC, 2025).

A search of the SWRCB GeoTracker database identified several cleanup sites in the vicinity, including Anderson Valley Equipment (LUST Cleanup Site, case closed 1996), Chemwest Industries (Cleanup Program Site, case closed 2012), and Jet Trucking (LUST Cleanup Site, case closed 1995). Importantly, GeoTracker also identifies two records mapped directly on the Project Site (APN: 117-040-107) under the name Louisiana Pacific – Kelly Gate (SWRCB, 2025):

- LUST Cleanup Site (T0609700337) – Case Closed July 14, 2011.
- Cleanup Program Site (SL0609790365) – Case Closed July 14, 2011.

These listings indicate that past hazardous materials releases occurred on the Site but were investigated and remediated under oversight of the regulatory agencies, and both cases have been formally closed.

A *Phase I Environmental Site Assessment Update* (Phase I ESA Update) was prepared by Environmental Science Associates (ESA) on May 27, 2025 (see Appendix J) to document changes that have occurred as a result of development activities since preparation of the September 2022 Phase I ESA and verify no new Recognized Environmental Conditions (RECs) have occurred as a result of the development activities. The Phase I ESA Update included a site inspection, review of regulatory agency records, and interview with a representative of the Tribe, and concluded that no RECs are present on-site (ESA, 2025).

IMPACT ANALYSIS

IX.a-b) **Less Than Significant Impact.** Construction of the proposed Project would involve the short-term use of hazardous materials typical of building activities, including fuels, oils, solvents, and paints. These materials would be stored and used in limited quantities and are regulated under federal, State, and local hazardous materials laws, including the California Health and Safety Code, California Occupational Safety and Health Administration (Cal/OSHA, 2023) standards, and the Cloverdale Municipal Code (CMC, 2024). Improper handling could create a hazard; however, compliance with existing regulatory requirements establishes controls for safe use, storage, and disposal of these substances during construction.

During long-term operation, the Project would consist of a 53-unit affordable housing community and a Behavioral Health and Wellness Center. Neither land use is associated with the routine transport, use, or disposal of significant quantities of hazardous materials. Operational hazardous materials use would be limited to common household and maintenance products (e.g., cleaning supplies, landscaping chemicals), which are not considered hazardous in the small quantities that would be used and are managed under household hazardous waste programs.

A search of the DTSC EnviroStor database identified one historical site within 0.5 mile of the Site (Cloverdale Wood Waste Landfill #1, referred to RWQCB). A search of the SWRCB GeoTracker database identified multiple closed cases, including two records mapped directly on the Project Site (Louisiana Pacific – Kelly Gate LUST Cleanup Site and Cleanup Program Site, both case closed in 2011), and three additional closed cases nearby (Anderson Valley Equipment, Chemwest Industries, Jet Trucking). These records confirm historical hazardous materials use in the vicinity, but all cases are regulatory “closed,” indicating no further remedial action is required.

The Site is not currently listed on the Cortese List (Government Code §65962.5) and does not operate as an active hazardous waste facility. No schools are located within 0.25 miles of the Site. The nearest educational facility is Cloverdale High School, located more than 0.5 miles away. As such, the Project would not result in hazardous emissions or hazardous materials handling within 0.25 miles of a school. Therefore, a less than significant impact would occur.

IX.c) **No Impact.** The Site is not currently listed on the Cortese List (Government Code §65962.5) and does not operate as an active hazardous waste facility. No schools are located within 0.25 miles of the Site. The nearest educational facility is Washington (Middle) School, located approximately 1.69 miles north of the Site. It is not anticipated that hazardous materials that would be utilized on-site would be used or stored at the Site in any quantity or application that could impact any schools in the area. As such, the Project would not result in hazardous emissions or hazardous materials handling within 0.25 miles of a school. Therefore, no impact would occur.

IX.d) **Less Than Significant Impact.** As previously discussed, the Cortese List (Gov. Code §65962.5) consolidates hazardous site information from multiple State agencies, including the Department of Toxic Substances Control (DTSC) EnviroStor database and the State Water Resources Control Board (SWRCB) GeoTracker database. A search of these databases indicates that the Project Site is associated with two historical cleanup records under the name Louisiana Pacific – Kelly Gate. These include a Leaking Underground Storage Tank (LUST) Cleanup Site (T0609700337) and a Cleanup Program Site (SL0609790365), both of which were listed as Case Closed in 2011 by the Regional Water Quality Control Board. Case-closed status indicates that remedial action was completed and no further action is required.

Nearby historical cleanup sites were also identified within one-half mile, including Anderson Valley Equipment (Case Closed 1996), Chemwest Industries (Case Closed 2012), Jet Trucking (Case Closed 1995), and the Cloverdale Wood Waste Landfill #1, which is listed as a historical site referred to the RWQCB for oversight.

As such, while the Project Site is associated with historical hazardous materials cases, all identified cases are closed and regulatory agencies have determined that no further action is required. Therefore, a less than significant impact would occur.

IX.e) **Less than Significant Impact.** As previously discussed, the Project Site is located in southern Cloverdale and is not within an adopted airport land use plan area. The nearest aviation facility is the Cloverdale Municipal Airport, which is a public-use airport located approximately 0.6 miles east of the Site on the opposite side of State Highway 101 (Google LLC, 2025). Although the Site lies within the 2-mile buffer commonly used in CEQA for evaluating aviation-related hazards and noise exposure, the Site is not within the influence area of the Sonoma County Airport Land Use Commission, which provides land use compatibility guidance for airports in the region (Sonoma County, 2024).

As such, although the Project is located within two miles from the nearest public airport, it is not within an airport land use plan area, a less than significant impact would occur.

IX.f) **Less Than Significant Impact.** As previously discussed, the Site (APN: 117-040-107) is located in northern Cloverdale with access provided by Kelly Road and Dutcher Creek Road, which connect directly to South Cloverdale Boulevard and Highway 101, the primary regional evacuation route identified in local and regional emergency planning documents including the Sonoma County Multijurisdictional Hazard Mitigation Plan (MHMP) Update 2021 (Volumes 1 and 2) (Sonoma County, 2021[a]). Development of the Site would include internal driveways and circulation improvements to connect to the existing roadway system.

The City of Cloverdale participates in regional emergency planning efforts, including the Sonoma County Emergency Operations Plan and the Local Hazard Mitigation Plan, which establish evacuation procedures and emergency response protocols for wildfire, flooding, and other hazards. The proposed Project would not involve changes to the existing roadway network that would obstruct or reroute emergency access, nor

would it place structures or barriers in a manner that would interfere with regional evacuation routes. Construction activities would be temporary and subject to standard traffic control requirements to maintain emergency vehicle access.

As such, the Project would not impair the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

IX.g) **Less Than Significant Impact.** As previously discussed, the Site is located within the Local Responsibility Area (LRA) due to its annexation into the City of Cloverdale. According to mapping prepared by the Office of the State Fire Marshal (OSFM), the Site was included in the February 24, 2025, recommended Fire Hazard Severity Zone updates as being within a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE, 2025).

Although the Site itself is largely disturbed and located adjacent to existing urban uses, the Very High designation reflects broader risk factors such as regional topography, vegetation, fuel loading, and modeled fire behavior that could expose future residents and structures to wildfire risk. The Project would introduce residential and community-serving uses in an area newly designated as having elevated wildfire hazard.

Fire protection and emergency response services would be provided by the Cloverdale Fire Protection District (CFPD), which operates under the Northern Sonoma County Fire Protection District (North County Fire) through a Joint Powers Agreement. The District participates in regional mutual aid agreements and coordinates closely with Cal Fire and Sonoma County during wildfire events (North County Fire, 2025; Sonoma County, 2021 [b]). Emergency evacuation would rely on Kelly Road and Dutcher Creek Road, which connect to South Cloverdale Boulevard and Highway 101, identified as regional evacuation routes.

All construction would be required to meet or exceed the State of California Wildland Urban Interface requirements set forth in the California Fire Code, Chapter 7, Chapter 47, PRC 4290, 4291, Title 14, including hazardous vegetation, fuel management, defensible space, and emergency vehicle access, address visibility, as well as the standards prescribed in the latest version of the California Building Code (CBC) to ensure fire hazards and risk is minimized. Furthermore, pursuant to Policy PS 5-12 of the Public Health and Safety Element of the City of Cloverdale General Plan (2009, amended 2015), all new development, including single-family residences, such as proposed under the Project, are required to provide built-in fire protection, including automatic fire sprinklers. Additionally, the CFPD would require the preparation of a vegetation management plan to implement the applicable codes and demonstrate adherence to defensible space requirements. Through compliance with existing standards and policies that have been established to reduce the potential for the occurrence of and damage caused by wildfires, potential impacts would be limited. A less than significant impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Hazards and Hazardous Materials.

X. HYDROLOGY AND WATER QUALITY. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

The U.S. Environmental Protection Agency's (EPA) National Pollutant Discharge Elimination System (NPDES) permit program addresses water pollution by regulating point sources that discharge pollutants to waters of the United States. Created in 1972 by the Clean Water Act, the NPDES permit program grants authority to State governments to perform many permitting, administrative, and enforcement aspects of the program. Within California, the NPDES permit program is administered by the State Water Resources Control Board (SWRCB). Construction projects that would disturb more than one acre of land, such as the proposed Project, would be subject to the requirements of General Construction Activity Stormwater Permit (Construction General Permit Order 2009-0009-DWQ, also known as the CGP), which requires operators of such construction sites to implement stormwater controls and develop a Stormwater Pollution Prevention Plan (SWPPP) identifying specific Best Management Practices (BMPs) to be implemented during construction to minimize the amount of sediment and other pollutants associated with construction sites from being discharged in stormwater runoff. These BMPs may include, for example, erosion control measures such as limiting construction during the rainy season, limiting ground disturbance to the minimum necessary, and stabilizing disturbed soil areas as soon as feasible after construction is completed, and sediment control measures such as straw bales, fiber rolls, and/or silt fencing structures. Chapter 16.10 *Storm Water* of the Cloverdale Municipal Code additionally contains provisions, which require development projects to minimize pollutants in stormwater runoff, in part, through the implementation of BMPs, as described above.

The City of Cloverdale, along with the County of Sonoma and various cities in Sonoma County, is a co-permittee on a Phase 1 Municipal Separate Storm Sewer System (MS4) General Permit that regulates stormwater discharges into its stormwater conveyance system, exempts specific non-stormwater discharges, and requires that Low Impact Development (LID) measures be implemented into project design. The Phase 1 MS4 General Permit requires local governing agencies to regulate stormwater runoff from new developments or significant redevelopment projects in urban areas. To comply with the permit, the City of Cloverdale adopted a stormwater ordinance to regulate stormwater discharges into its system. Additionally, the City of Cloverdale developed LID standards that include stormwater BMPs to reduce problems with erosion and increase the chance for on-site filtration and purification of stormwater. The City of Cloverdale is located in the Alexander Valley Groundwater Basin; however, the water supply of the City of Cloverdale is provided by seven (7) wells under the direct influence of surface water from the Russian River (City of Cloverdale, 2010). The Master Water Plan for the City of Cloverdale (2010), the Site is located within Pressure Zone 3 of the City of Cloverdale Water System and the future build-out of a 12-inch water main to serve properties in the Project vicinity were conceptualized in the 2010 City of Cloverdale Water System Master Plan Update.

A *Biological Resources Evaluation and Survey Memorandum* (Biological Report) was prepared by Environmental Science Associates (ESA) on February 6, 2026 (see Appendix F), to summarize a biological resources evaluation for the proposed Project. The Biological Report identified a northeast-flowing ephemeral drainage swale system in the study area. An ephemeral channel is a stream that only has water during, and for a short time after, a precipitation event. The ephemeral drainage swale system has both swale segments with no defined bed or bank and incised channel segments with a defined bed, bank, and ordinary high water mark (OHWM). An aquatic resources survey was conducted by ESA in 2018 (enclosed as Appendix C of the Biological Report, and at the time of the survey, the drainage system was completely dry, with no evidence of recent flow. The swale system eventually connects via a culvert to an ephemeral channel on an adjacent property. It then appears to flow to Icaria Creek, a tributary of the Russian River, which is a traditional navigable water.

Based on the Biological Report, the on-site drainages are unlikely to be considered jurisdictional waters of the U.S. because they only flow in direct response to precipitation and do not have a regular surface connection to the Russian River. However, the ephemeral channel is likely to be considered a water of the State of California and a stream by the California Department of Fish and Wildlife (CDFW).

Furthermore, the Site in inland Sonoma County, and is located in Zone "X," an area with a minimal flood risk, as indicated by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel No. 06097C0119E. Zone "X" has a 0.2 percent annual chance of flooding and a one percent annual chance of flooding to a depth of less than one foot (FEMA, Not Dated).

IMPACT ANALYSIS

X.a) Less Than Significant Impact. The proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. The proposed residential development and wellness center would be constructed in accordance with the most recent standards set by all regulatory agencies, including but not limited to the City and State and local water quality control boards (SWRCB and RWQCB). Additionally, the Project would be subject to the CGP and Chapter 16.10 *Storm Water* of the CMC, which require the preparation and implementation of a SWPPP that specifies erosion and sediment control construction and post-construction BMPs to reduce or eliminate construction-related and operational impacts on receiving water quality.

Under the Project, stormwater would be directed to and controlled via several Site improvements, including three bioswales and one detention pond along the northern boundary of the Site. These features would be designed and located to allow infiltration, water detention, and natural filtration of stormwater on-site. The installation of a new 36-inch culvert extension from the west would carry runoff from upstream (off-site) under the proposed road and outlet to the east. These on-site improvements would mimic stormwater benefits of the natural environment, reduce peak runoff flow, and remove potential pollutants from stormwater flow before it enters the storm drain system. Therefore, the proposed Project would have a less than significant impact.

X.b) Less Than Significant Impact. The proposed Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. As noted above, the City of Cloverdale relies on seven wells under the direct influence of surface water from the Russian River for its water supply and therefore does not currently utilize groundwater from the Alexander Valley Groundwater Basin for its water supply. In addition, the Site is located within Pressure Zone 3 of the City of Cloverdale Water System and the future build-out of a 12-inch water main to serve properties in the vicinity of the Site were conceptualized in the 2010 City of Cloverdale Water System Master Plan Update and the Site is located within the area of interest of the Infrastructure Assessment and Plan for South Cloverdale, dated 2019, which will assess the current infrastructure needs and provide a plan for achieving full build-out. Therefore, the water demand of the Project would not exceed the capacity of the City of Cloverdale water system. As a result, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. A less than significant impact would occur.

X.c.i) Less Than Significant Impact. The Project would not result in substantial erosion or siltation on- or off-site as the Project would be subject to the CGP and Chapter 16.10 *Storm Water* of the CMC which require the preparation and implementation of a SWPPP that specifies erosion and sediment control construction and post-construction BMPs to reduce or eliminate construction-related and operational impacts on receiving water quality. In addition, in compliance with the City of Cloverdale Phase I MS4 program requirements, the Project would include bioswales, detention ponds, and rain gardens throughout the developed portions of the Site to mimic stormwater benefits of the natural environment, reduce peak runoff flow, and remove potential pollutants from stormwater flow before it enters the storm drain system. Therefore, construction activities and the introduction of impervious surfaces resulting from the proposed residential development and road construction would not result in substantial erosion or siltation. A less than significant would occur as a result of the Project.

X.c.ii-iii) Less Than Significant Impact. As described above, on-site drainage is currently conveyed from the southwest to the northeast via an ephemeral drainage swale system that eventually flows through a 24-inch metal culvert located under the existing structures on the Site to an unvegetated swale on the parcel identified by APN: 117-040-107. Along the northern boundary of the Site, an ephemeral drainage channel flows eastward through the parcel before entering culverts under Dutcher Creek Road and Highway 101, conveying flows from the on-site drainage channel to the existing City storm drain system.

Upon Project build-out, drainage from the Site would be directed towards the City's storm drainage system by way of a proposed stormwater conveyance system that includes maintaining segments of the existing ephemeral drainage swale system and the installation of proposed culverts and storm drain pipes. In addition, stormwater would be directed to and collected in three bioswales and a detention pond. In compliance with the City of Cloverdale Phase I MS4 program requirements, the bioretention structures would mimic stormwater benefits of the natural environment, reduce peak runoff flow, and remove potential pollutants from stormwater flow before it enters the storm drain system. As the anticipated increased runoff

caused by the introduction of impervious surfaces would be compensated for with bioretention structures and LID source controls, the proposed Project would not be anticipated to create or contribute runoff water which would exceed the capacity of existing or planned storm drainage systems or provide substantial additional sources of polluted runoff. The proposed Project would not impede or redirect flows, significantly increase the amount of surface runoff, or contribute significant amounts of runoff that would exceed the capacity of storm drainage systems. Therefore, the Project would have a less than significant impact.

X.c.iv) No Impact. The Site is not located in an area prone to flooding or within a designated flood hazard zone, as depicted on the FEMA FIRM Panel No. 06097C0119E, effective December 2, 2008. As a result, the Project would not impede or redirect flood flows and no impact would occur.

X.d) No Impact. As described above, according to FEMA FIRM Panel No. 06097C0119E, effective December 2, 2008, the Site is entirely classified as an "Area of Minimal Flood Hazard" (Zone X), with a 0.2 percent annual chance of flood hazard and a one percent annual chance flood with average depth of less than one foot or with drainage areas of less than one square mile (FEMA, Not Dated). Seiches and tsunamis are short duration earthquake-generated water waves in large enclosed bodies of water and the open ocean. The Site is more than 20 miles east from the Pacific Ocean and more than 3 miles east from Lake Sonoma, which would preclude the Site from inundation by tsunami or seiche. No impact would occur.

X.e) Less Than Significant Impact. As discussed above, although the City of Cloverdale is located in the Alexander Valley Groundwater Basin, the water supply of the City is provided by seven wells under the direct influence of surface water from the Russian River. The Site is located within Pressure Zone 3 of the City of Cloverdale Water System and the future build-out of a 12-inch water main to serve properties in the Project vicinity was conceptualized in the 2010 City of Cloverdale Water System Master Plan Update (2010). By connecting to the City of Cloverdale Water System, the Project would not be anticipated to decrease groundwater supplies or interfere substantially with groundwater recharge. In addition, the proposed Project would be subject to and comply with the Chapter 16.10 *Storm Water* of the CMC, the City of Cloverdale Phase 1 MS4 program, and the CGP to limit the potential for stormwater runoff impacts. Compliance with these regulations would facilitate the implementation of water quality control efforts at the local and state levels. Therefore, the proposed project is not anticipated to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. A less than significant impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Hydrology and Water Quality.

XI. LAND USE AND PLANNING. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

The proposed Project is located in the City of Cloverdale with a current land use and zoning designations of General Commercial (GC) and zoning designation of General Commercial (G-C). To facilitate the proposed development, the Project would involve a General Plan Amendment (GPA) to change the City land use designation from General Industry (GI) to General Commercial (GC) (see Figure 2) and a Rezone to change the City zoning designation from General Industrial (M-1) to General Commercial (G-C) (see Figure 3) and a minor subdivision of 16.52 acres into one (1) 3.14+/- acre lot and a designated remainder. Table 2 of the Project Description shows the current and proposed land use and zoning designations for the Site. Please refer to Figures 2 and 3 for a depiction of the existing and proposed City of Cloverdale land use and zoning designations.

Approximately 10.88 acres is proposed to be designated as General Commercial (GC) with General Commercial (G-C) zoning. This zoning typically allows for a variety of business and community uses, including multi-family housing and public services, which are consistent with the proposed Project. The remaining 8.52 acres are currently designated General Industry (GI) with General Industrial (M-1) zoning. This designation is intended for manufacturing and warehousing and is not suitable for residential development. The GI/M-1 portion of the Site would be reduced to 5.64 acres. The Project also includes a minor subdivision of the 16.52-acre parent parcel. This subdivision would create a new, approximately 3.32-acre lot for the proposed 53 residential units and Wellness Center. The remainder of the parcel, approximately 13.52 acres, would retain its existing designation and remain undeveloped for potential future use.

IMPACT ANALYSIS

XI.a) No Impact. The proposed Project would not physically divide an established community. The Site is located on a single, undeveloped and previously disturbed parcel (APN: 117-040-107). It is not situated in a way that would sever an existing neighborhood or disrupt established pedestrian or vehicular access routes. The Site is bounded by Highway 101, other commercial properties, and the recently completed Phase 1 of the Bi'du Khaale Housing Project. The new development, which includes an internal roadway and pedestrian access, is designed to integrate with the adjacent Phase 1 Project, creating a cohesive community rather than dividing an existing one. As no new barriers or major infrastructure would be introduced that would impede public access or circulation, no impact would occur.

XI.b) Less Than Significant Impact. The proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Compliance with the General Construction Activity Stormwater Permit (Construction General Permit Order 2009-0009-DWQ, also known as the CGP), and Chapter 16.10 *Storm Water* of the Cloverdale Municipal Code, as described in Sections IV, VII, and X (Biological Resources, Geology, and Hydrology and Water Quality, respectively), would ensure impacts to the existing culvert and any associated riparian habitats and potential natural communities on-site are limited.

As noted above, the Project involves Rezoning, a General Plan Amendment, and minor subdivision. The proposed Project includes the construction of 53 housing units for use by Tribal members, and a Wellness Center. The General Commercial (GC) land use with General Commercial (G-C) zoning designations allow for a variety of development types such as commercial, residential, recreational, and industrial. The proposed 53-unit housing development would be compatible with the allowed uses and density of the GC land use and G-C zoning designations would support the proposed level of development. While no specific development is proposed on the remainder parcel at this time, current land use and zoning designations would remain and would allow for future industrial and commercial development. The proposed Project would be consistent with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect and would be compatible with surrounding uses and the proposed land use and zoning designations of the Site. A less than significant impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Land Use and Planning.

XII. MINERAL RESOURCES. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

The proposed Project is not located in an area of known rock, aggregate, sand, or other mineral resource deposits of local, regional, or state residents. There are no known mineral resources of significance on the Site that would be made unavailable by the proposed Project. Furthermore, the Site is not utilized for Surface Mining and Reclamation Act (SMARA) activities and the nearest active mineral extraction operation to the Site is located approximately 4.6 miles northeast (USGS – Google Earth KMZ File, 2017), and the nearest mineral resource site is located approximately 0.9 miles east, along the Russian River (CGS, 2013).

IMPACT ANALYSIS

XII.a-b) **No Impact.** The proposed Project area does not contain mineral resources that are of value locally, to the region, or to residents. The proposed Project area is not identified as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, the proposed Project would not interfere with materials extraction or otherwise cause a short-term or long-term decrease in the availability of mineral resources. No impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Mineral Resources.

XIII. NOISE. Would the Project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

Excessive and chronic exposure to elevated noise levels can result in auditory and nonauditory effects in humans. Auditory effects of noise on people are those relating to temporary or permanent hearing loss induced by noise. Nonauditory effects of exposure to elevated noise levels are those relating to behavioral and physiological effects. The nonauditory behavioral effects of noise on humans are associated primarily with the subjective effects of annoyance, nuisance, and dissatisfaction, which lead to interference with such activities as communications, sleep, and learning.

The degree to which noise results in annoyance and interference with activities is highly subjective and may be influenced by non-acoustic factors. The number and effect of these non-acoustic environmental and physical factors vary, depending on the individual characteristics of the noise environment, including sensitivity, level of activity, location, time of day, and length of exposure. One key aspect to the prediction of human response to new noise environments is the individual level of adaptation to an existing noise environment. The greater the noise level change caused by a new noise source relative to an individual's customary environment, the less tolerant of the new noise source the individual will be. With regard to human perception of increases in sound levels expressed in decibels (dB), a 1 dB change generally is not perceivable, excluding controlled conditions and pure tones. Outside controlled laboratory conditions, the average human ear barely perceives a change of 3 dB. A 5 dB change generally fosters a noticeable change in human response, and an increase of 10 dB is subjectively heard as a doubling of loudness.

As provided in the Noise Element of the City of Cloverdale General Plan (2009, amended 2015), the City has established noise compatibility standards for different land uses for both exterior and interior locations, as provided below:

Exhibit 4.1 LAND USE AND NOISE COMPATIBILITY STANDARDS – EXTERIOR

Land Use Category	Community Noise Exposure $L_{dn}/CNEL$, dB						
	55	60	65	70	75	80	
Residential							
Transient Lodging							
Schools, Libraries, Churches, Hospitals, Nursing Homes, Etc.							
Theaters & Auditoriums							
Outdoor Spectator Venues							
Playgrounds & Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries, Etc.							
Commercial & Professional Development							
Industrial & Agricultural Development							
	Normally Acceptable			Normally Unacceptable			
Specified land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction without any special noise requirements				New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirement must be made and needed noise insulation features included in the design.			
	Conditionally Acceptable			Clearly Unacceptable			
New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design.				New construction or development should not be undertaken.			

Source: State of California General Plan Guidelines – Office of Planning and Research, and Bollard Acoustical Consultants, Inc.

Exhibit 4.2 LAND USE AND NOISE COMPATIBILITY STANDARDS – INTERIOR

Land Use Category		L _{dn} /CNEL, dB
Category	Use	Interior ¹
Residential	Single-Family, Duplex, Multi-Family	45 ²
	Mobile Home	45 ²
Commercial Industrial Institutional	Hotel, Motel, Transient Lodging	45
	Commercial Retail, Bank, Restaurant	50
	Office, Research and Development	45
	Amphitheater, Concert Hall, Meeting Hall	45
	Gymnasium (MP Room)	50
	Sports Club	55
	Manufacturing, Warehouse, Wholesale, Utility	50
	Movie Theater or Theater	35
Institutional	Hospital, School (Classroom)	45
	Church, Library	40
Open Space	Park	NA

¹ All indoor environments excluding bathrooms, toilets, closets, and corridors.

² Noise level required with exterior windows and doors closed.

Development of the 53 affordable housing units and Wellness Center proposed on the Site would be subject to the exterior and interior noise limits established by the City of Cloverdale General Plan and the California Building Code (CBC). Pursuant to Section 1207, Sound Transmission, Chapter 12 (Interior Environment) of the CBC, allowable interior noise levels for habitable rooms must not exceed 45 dB CNEL with windows and doors closed (CBC, 2022).

As outlined in the City of Cloverdale General Plan Noise Element, residential development is considered (City of Cloverdale, 2009):

- “Normally Acceptable” in areas with an exterior noise level below 60 dB CNEL,
- “Conditionally Acceptable” in areas with 60–70 dB CNEL,
- “Normally Unacceptable” in areas with 70–75 dB CNEL, and
- “Clearly Unacceptable” in areas where exterior noise levels exceed 75 dB CNEL.

The Project Site (APN: 117-040-107) is located adjacent to Dutcher Creek Road and approximately 125 feet from the southbound lanes of Highway 101, a major regional traffic corridor (Google Earth Pro, 2024). According to the Cloverdale General Plan Noise Element, modeled traffic noise levels for the Highway 101 segment between Treadway Boulevard and the South Interchange are approximately 65 dB L_{dn} at 100 feet, with the 60 dB L_{dn} contour extending to about 207 feet from the roadway centerline (City of Cloverdale, 2009). Given the Site’s proximity, portions of the parcel are anticipated to be exposed to exterior noise levels slightly above 60 dB CNEL, placing them within the “Conditionally Acceptable” range for residential uses.

To ensure compliance with the CBC maximum interior noise standard of 45 dB CNEL, the Project’s building design and construction may incorporate sound-attenuating techniques, such as enhanced wall insulation, sound-rated windows, and mechanical ventilation.

As such, the Project would be consistent with State and local noise compatibility standards, provided that building design ensures compliance with interior noise standards.

IMPACT ANALYSIS

XIII.a) ***Less Than Significant Impact with Mitigation Incorporated.*** The proposed 53 affordable housing units and Behavioral Health and Wellness Center would not be expected to generate noise in excess of what is typical for residential and community-serving uses once grading and construction are complete. Operational noise would primarily consist of vehicle trips associated with residents, staff, and visitors traveling to and from the Site, as well as typical residential activities. Given the Project's location adjacent to Dutcher Creek Road and in close proximity to Highway 101, ambient noise levels in the vicinity are influenced primarily by highway traffic (City of Cloverdale, 2009).

Construction of the Project would result in temporary noise increases from grading, excavation, and the use of heavy equipment. The most sensitive receptors in the Project vicinity are the 23 single-family residences and Community Center immediately southwest of the Project Site, which were developed following approval of a prior project on the adjacent parcel (Google LLC, 2025). Additional sensitive receptors include a single-family residential neighborhood approximately 1,600 feet northwest of the Site and residences approximately 1,400 feet southeast of the Site. Noise generated during construction could be audible at these nearby residences, particularly those southwest of the Site. However, construction activity would be temporary and subject to compliance with applicable City noise requirements. To minimize impacts, Mitigation Measure NOISE-1 requires implementation of best management practices, including locating stationary noise-generating equipment away from the nearest residences where feasible and designating a noise disturbance coordinator.

With respect to operational noise exposure, the closest edge of the Site is located approximately 125 feet from the southbound lanes of Highway 101 (Google LLC, 2025). According to the Cloverdale General Plan Noise Element, the modeled traffic noise levels for the Highway 101 segment between Treadway Boulevard and the South Interchange are approximately 65 dB Ldn at 100 feet from the roadway centerline, with the 70 dB Ldn contour extending 45 feet, the 65 dB Ldn contour extending 96 feet, and the 60 dB Ldn contour extending 207 feet (City of Cloverdale, 2009). Based on the lack of intervening natural or developed features between the Site and the highway, these estimates can be conservatively applied to the Project location. This indicates that portions of the Site are likely to experience exterior noise levels slightly above 60 dB Ldn, which falls within the "Conditionally Acceptable" range for residential uses under General Plan guidelines.

To ensure compliance with the 45 dB CNEL interior noise standard established in the CBC, Project design may include sound-attenuating construction techniques such as enhanced wall insulation, sound-rated windows, and mechanical ventilation (CBC, 2022).

As such, construction of the Project would result in temporary noise increases but would be reduced through implementation of Mitigation Measure NOISE-1. Operationally, portions of the Site are anticipated to be exposed to exterior noise levels in the conditionally acceptable range due to proximity to Highway 101; however, compliance with CBC standards and Project design features would ensure interior noise levels remain within allowable limits. Therefore, the Project would result in a less than significant impact with mitigation incorporated.

XIII.b) ***Less Than Significant Impact.*** There are no proposed uses on the Site that would result in excessive groundborne vibration or groundborne noise levels during operation. The Project would introduce residential

and community-serving uses, which are not typically associated with activities that produce groundborne vibration.

During construction, initial site preparation and grading would require the use of heavy equipment such as bulldozers, graders, and haul trucks, which may cause temporary groundborne vibration or groundborne noise. The most sensitive receptors in proximity to the Site are the 25 single-family residences and Community Center immediately southwest of the Site. Additional sensitive receptors include residences approximately 1,400 feet southeast and 1,600 feet northwest of the Site. Given the separation distances and the temporary nature of construction activities, vibration and groundborne noise would be expected to attenuate substantially before reaching these off-site receptors.

No groundborne vibration or groundborne noise would be anticipated during long-term operation of the Project, as the proposed land uses are residential and community-serving in nature and do not include high-vibration generating activities such as industrial or rail operations.

As such, the potential short-term groundborne vibration and noise associated with construction would not adversely affect off-site receptors, and no long-term vibration or groundborne noise is anticipated. Therefore, the Project would result in a less than significant impact.

XIII.c) **No Impact.** As previously discussed, the Site is located approximately 0.5 mile west of the Cloverdale Municipal Airport, a public-use airport. However, as shown in Exhibit 4.4 (Cloverdale Municipal Airport Noise Contours 2025) of the Noise Element of the City's General Plan (2009, amended 2015), the Site is located outside of the 55, 60, 65, 70, and 75 dB CNEL noise contours around the airport. Therefore, no impact would occur.

MITIGATION MEASURES

NOISE-1: The following measures are required in order to reduce potential construction-related impacts to a less-than-significant level:

- The construction contractor shall ensure that all internal combustion-engine-driven equipment is equipped with mufflers that are in good operating condition and appropriate for the equipment.
- The construction contractor shall ensure that "quiet" models of air compressors and other stationary construction equipment are utilized where such technology exists.
- The construction contractor shall, to the maximum extent practical, locate on-site equipment staging areas to maximize the distance between construction-related noise sources and noise-sensitive receptors nearest the Site during all Project construction.
- The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the Site.
- The construction contractor shall prohibit unnecessary idling of internal combustion engines (i.e., in excess of 5 minutes).
- The construction contractor shall designate a noise disturbance coordinator who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaints (starting too early, bad muffler, etc.) and institute reasonable measures warranted to correct the problem. The construction contractor shall conspicuously post a telephone number for the disturbance coordinator at the construction site.

FINDINGS

The proposed Project would have a **Less Than Significant Impact with Mitigation Incorporated** on Noise.

XIV. POPULATION AND HOUSING. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and/or businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

According to the *City of Cloverdale 2023-2031 Housing Element Update* (2023-2031 Housing Element; adopted on September 26, 2023), the City of Cloverdale had a population of 6,831 persons in 2000 to a population of 8,996 in 2020 constituting a 34.2 percent growth rate over two decades.

According to data from the U.S. Census Bureau, the population of the City of Cloverdale in 2023 was estimated at 8,933 people, a decrease of approximately 31 people from 2022 (U.S. Census Bureau, n.d.). In 2023, there were an estimated 3,566 total household units with an average household occupancy rate of 20 percent for housing units with four or more bedrooms (U.S. Census Bureau, n.d.). Using the average household size of 2.9 persons (U.S. Census Bureau, n.d.), the 53 single-family residential lots proposed on-site would be anticipated to result in a population increase of approximately 154 residents at the subject Site.

The proposed Project aligns with the policies, goals, and action items found in the Housing Element, including Policy H-4.1 (Equal Housing Opportunity) and Policy H-6.3 (Infrastructure and Public Services.). Furthermore, in accordance with Section 205(a)(2) of the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA) and Section 18.13.070 *Continued affordability* of the Cloverdale Municipal Code (adopted 2015), each housing unit would remain affordable for the useful life of the Project.

IMPACT ANALYSIS

XIV.a) **Less Than Significant Impact.** Unplanned population growth would result if the Project generated population growth that was not considered in the General Plan of the City of Cloverdale. However, the Project would not result in unplanned growth as it has already been analyzed in the City's Housing Element. The Project is a planned and anticipated development that the City is using to meet its state-mandated housing goals as cities are required by the State to show how they will meet their housing needs, and the Project listed as a project that provides Regional Housing Needs Allocation credits, meaning the City gets to count the proposed units toward its required housing numbers. Furthermore, the Project's purpose is to provide housing for low-income tribal members and is designed to serve a particular housing need rather than to attract a large, unmanaged population increase.

Additionally, development of the proposed 53 units would be anticipated to result in a maximum of 154 residents on-site, which equates to approximately 1.7 percent of the City's estimated population in 2023 (U.S. Census Bureau, n.d.). The Site is located within the southern portion of the Urban Growth Boundary (UGB) and Sphere of Influence (SOI) of the City of Cloverdale. As such, development of the Site for residential use was included in the population projections noted above. Although the infrastructure for water and wastewater services is not currently present on Site, the extension of these services to the Site were planned in the City of Cloverdale Water and Sewer System Master Plan Updates in 2010 and 2009, respectively. Refer

to Section XIX (Utilities and Service Systems), below, for additional discussion. Since the proposed Project would not induce substantial population growth, a less than significant impact would occur.

XIV.b) No Impact. The Site is undeveloped and is previously disturbed. As shown on the Site Plan (Figure 4), the Site proposes 53-unit affordable housing community. As such, the Project would not displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere. No impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Population and Housing.

XV. PUBLIC SERVICES. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

As previously discussed, the Project is for 53 housing units and a Wellness Center on a portion of the Site. Primary access to the Site would take place off Dutcher Creek Road. Under the Project, vehicular access and parking would include internal public streets that would connect to the existing public road. There are no elements of the proposed Project that would significantly impact the ability of the City or other local services providers to provide public services to the local community.

IMPACT ANALYSIS

XV.a) **Less Than Significant Impact.** The Cloverdale Fire Protection District (CFPD) provides fire protection services to the City of Cloverdale (Northern Sonoma County Fire – Cloverdale, No Date). The CFPD operates to protect the community from fires and other emergencies through a combination of paid and volunteer staff. The paid team includes a Fire Chief, a Battalion Chief, five Captains, one Engineer, and five Firefighters, and supported by two administrative staff members. This is complemented by a large group of dedicated volunteers, including one Battalion Chief, four Captains, two Lieutenants, three Engineers, and ten Firefighters. The CFPD's equipment is designed to handle a wide range of emergencies within the City and rural areas. They have a fleet of specialized fire apparatus, including a city pumper for urban emergencies (Engine 6580), an "interface" pumper for both vegetation and structure fires in the rural parts of the district (Engine 6570), and a 4-wheel drive wildland engine for vegetation fires (Engine 6560). The CFPD also maintains a rescue engine for vehicle extractions (Engine 6530), a water tender for supplying water to other engines, and utility and command vehicles for various needs.

The CFPD is the nearest station to the Site. It is located at 451 S. Cloverdale Boulevard, approximately 1.8 miles north of the Project area. As discussed under Section IX (Hazards and Hazardous Materials) above, the Site is located within the service boundaries of the CFPD and is located within a very high or high fire hazard severity zone (CAL FIRE, 2025). Per the County of Sonoma Fire Protection Service Providers Municipal Service Review (Fire MSR), prepared by Economic & Planning Systems, Inc. for the Sonoma County Local Agency Formation Commission (LAFCO) in August 2005, the CFPD was formed in 1996, serves an area of 76 square miles, and signed an "Amador" contract with the CAL FIRE in November 1997. This agreement ensures that the Fire District receives an additional response from CAL FIRE to all incidents within its service area. The Amador Plan allows local fire agencies to contract with CAL FIRE for fire protection services during non- fire-season months. In addition to its contract with CAL FIRE, CFPD has automatic aid agreements with Geyserville

and Hopland. Cooperative arrangements with the City of Cloverdale include the joint Master Plan and a shared public safety facility (Economic & Planning Systems, Inc, 2005).

As the Project entails the development of 53 housing units, there would be an increase in need for fire protection services at the Site. The Project would be served by Dutcher Creek Road and Nopo Way via Kelly Road and an internal roadway identified as Road B for circulation within the Site and a secondary access connecting to Nopo Way. All proposed roads would be designed to provide sufficient width and turning radii consistent with Cloverdale Municipal Code Chapter 15.14 Sections 503.2.1, 503.2.3, and 503.2.4. Additionally, consistent with the General Plan Public Health and Safety Element (2009, amended 2015) and the Cloverdale Municipal Code, all new construction would be required to meet California Fire Code requirements for fire detection and suppression.

Implementations of Policy PS 1-5 of the Public Health and Safety Element of the City of Cloverdale General Plan (2009, amended 2015) require the Community Development Department to ensure that proposed development would provide adequate emergency vehicle access. In addition, the City coordinates with the CFPD to ensure that proposed development would be served by adequate fire protection service and all fair share fees are paid. The Project would be required to pay the CFPD development impact fees consistent with Municipal Code Section 17A.04.020. These fees would be used to pay for new or expanded fire protection facilities or equipment, which would improve the ability of the CFPD to provide services. Furthermore, the Project would be provided adequate water supplies during, normal, dry, and multiple dry years, which would ensure sufficient water is available for fire protection services. Therefore, impacts would be less than significant.

XV.b) **Less Than Significant Impact.** Police protection services would be provided by the Cloverdale Police Department (CPD). The CPD is split into four divisions: Administration, Auxiliary Services, Communications and Records, and Field Services and Investigations. Staffing of these divisions is as follows: Administration Division includes the Chief of Police and one Police Lieutenant; Auxiliary Services Division includes one full-time Community Services Officer (CSO), one volunteer Reserve Officer, school crossing guards, and volunteer police employees; Communications and Records Division includes six full-time Public Safety Dispatchers/Records Technicians and is overseen by the Technical Services Manager; and Field Services and Investigations Division includes a Patrol Division with two sergeants and nine officers (City of Cloverdale, Not Dated). The CPD is located approximately 2.8 miles northwest of the Site.

As the Project entails the development of a 53-unit housing development, the Project would likely increase the need for police protection services at the Site. However, as discussed in Section XIV (Population and Housing), above, development of the Site for residential is consistent with the City of Cloverdale Housing Element (2009, amended 2015) and the anticipated 154 residents would equate to approximately 1.4 percent of the 1.7 percent of the City's estimated population in 2023. The need for increased police services to serve the projected population growth would have been accounted for in the development of the General Plan. In addition, "Implementations PS 1-5" of the Public Health and Safety Element of the City of Cloverdale General Plan (2009, amended 2015) requires that the Community Development Department ensures proposed development participates in any assigned proportional costs for the expansion of City Public Safety facilities, equipment, or services, including police services provided within the City. A less than significant impact would occur.

XV.c) **Less Than Significant Impact.** The Site is located within 3 miles of four schools. Specifically, the Site is located approximately 1.7 miles south of Washington Middle School, approximately 2.2 miles south of Johanna Echols Hansen High School, approximately 2.6 miles south of Jefferson Elementary School and

approximately 2.4 miles south Cloverdale High School. Based on information provided by the U.S. Census Bureau (n.d.), persons under the age of 18 years (or school-age) represent 18.4 percent of the City's population. As a result, it is expected that of the new residents anticipated on-site, approximately 28 people would be under 18 years of age. As a result, it is anticipated that any new students as a result of the proposed Project could be adequately accommodated by existing schools within the vicinity of the Site and a less than significant impact would occur.

XV.d) **Less Than Significant Impact.** The City of Cloverdale, as detailed in its Parks and Recreation Element of the City of Cloverdale General Plan (2015), is responsible for managing, operating, and maintaining 146.8 acres of parks, open spaces, and recreation centers within the city limits. Several parks and recreational facilities are located within 5 miles of the Site, as described in further detail in Section XVI (Recreation), below. These parks include Furber Park, Clover Springs Preserve, Tarman Park, Clark Park, Vintage Meadows Park, and Cloverdale City Park which are located within approximately 0.9 to 2 miles of the site.

As the Project ultimately leads to the development of an additional 53 residential units, the population is expected to increase as a result of the proposed Project. However, the Project is not anticipated to significantly increase the usage of local parks or recreational facilities such that new facilities would be needed. Furthermore, the development would require payment of development impact fees, including park facility fees, for the long-term development of new parks as directed by the CMC. A less than significant impact would occur.

XV.e) **Less Than Significant Impact.** As previously indicated, the population is expected to increase as a result of the proposed Project. Residential development at the Site was anticipated in the City of Cloverdale General Plan (2009, amended 2015) and *2023-2031 Housing Element Update* (2023-2031 Housing Element; adopted on September 26, 2023), although the proposed zoning designation of G-C would allow for a greater density of housing units than the current land use designation of M-1, the population increase would not constitute unplanned population growth that would otherwise significantly increase the usage of other public facilities, such as regional hospitals or libraries, or significantly increase the population of the City of Cloverdale to the extent that new or physically altered public facilities would be required. A less than significant impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Public Services.

XVI. RECREATION. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

According to the Parks and Recreation Element of the City of Cloverdale General Plan (2009, amended 2015) the City of Cloverdale seeks to provide five acres of City-owned Park and recreation land per 1,000 residents, pursuant to Policy PR 1-2, and 1.5 acres of open space recreation per 1,000 residents. Per the Parks and Recreation Element, The City of Cloverdale maintains 4.2 acres of neighborhood parks, 13.4 acres of community parks, 25.9 acres of active open space, and 0.8 acres for community centers, for a total of 44.3 acres of parks. Additionally, the City of Cloverdale maintains 58.2 acres of passive open space in conjunction with the County of Sonoma.

The Site is located in the vicinity of the following neighborhood parks and recreational facilities:

- Furber Park, located approximately 0.9 miles northwest of the Site;
- Clover Springs Preserve, located approximately 1.4 miles northwest of the Site;
- Tarman Park, located approximately 1.3 miles northwest of the Site;
- Clark Park, located approximately 1.4 miles northwest of the Site;
- Vintage Meadows Park, located approximately 1.7 miles northwest of the Site;
- Cloverdale City Park, located approximately 2 miles northwest of the Site;
- Cloverdale River Park, located approximately 3.2 miles north of the Site;
- Lake Sonoma Recreation Area, located approximately 3.8 miles south of the Site; and
- Yorty Creek Recreation Area (Lake Sonoma), located approximately 5.5 miles west of the Site.

Furthermore, the proposed Project would include a Community Center, and amenities such as a playground, and fitness room, which would further demonstrate the proposed Project would not result in a need for new or expanded recreational facilities.

IMPACT ANALYSIS

XVI.a-b) Less Than Significant Impact. As previously described under Section XIV (Population and Housing) above, the proposed Project entails development of 53 units on the subject Site, which would be anticipated to result in a total of approximately 154 residents on-site. As a result of the anticipated population increase, increased use of existing park and recreational facilities would also be anticipated, but not to such a level to create a need for a new or physically-altered park or recreational facility. The Site is located in the vicinity of several existing recreational facilities, including Furber Park, Colver Springs Preserve, Vintage Meadows Park, Tarman Park, Clark Park, Cloverdale City Park, Cloverdale River Park, Yorty Creek Recreation Area, and Lake Sonoma Recreation Area. The existing and planned recreational resources are anticipated to adequately accommodate the Project's population without causing substantial physical deterioration or acceleration of deterioration to existing facilities. Additionally, in accordance with Chapter 17A.20 *Parks and Recreation Facilities Construction Fee* of the CMC, the development of the proposed Project would require

the payment of park facility fees to the City, which would be utilized for the maintenance and development of park facilities within the City of Cloverdale. A less than significant impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Recreation.

XVII. TRANSPORTATION. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

The Project would be served by Kelly Road from Dutcher Creek Road and three private streets currently identified as Nopo Way, Road A, and Road B. Nopo Way is the primary access to the Site off Kelly Road. Road A runs along the southern boundary of the Site and serves to connect Nopo Way to Dutcher Creek Road. Road B would connect Nopo Way and Road A, offering internal access for the Site, and would be constructed with curbs, gutters, and sidewalks.

A *Traffic Impact Study: 27821 Dutcher Creek Road, City of Cloverdale* (Traffic Impact Study) was prepared by Abrams Associates Traffic Engineering, Inc. on December 3, 2025 (see Appendix I), in order to assess potential impacts on the roadway network and study intersections, in addition to pedestrian, bicycle, and transit facilities.

Roadways

Per the Traffic Impact Study, the following roadways are some of the main roadways in the area that have the potential to be impacted by the Project:

- U.S. Highway 101: A four-lane freeway that runs in a north-south direction.
- South Cloverdale Boulevard: A two-lane roadway running north to south, extending north from Dutcher Creek Road at Kelly Road and becoming North Cloverdale Boulevard to the north of 1st Street.
- Dutcher Creek Road: A two-lane roadway running north to south, extending south from South Cloverdale Boulevard at Kelly Road and terminating to the south at Dry Creek Road.
- Santana Drive: A two-lane roadway running east to west, spanning east from South Cloverdale Boulevard and terminating at Asti Road. The road also provides access to U.S. Highway 101.
- Road A and Nopo Way: Two-lane residential roadways serving the Bi'du Khaale Project (Abrams, 2025).

Primary access to the Site would be via Road A off Dutcher Creek. An internal access road (Road B) is also proposed, which would connect to Nopo Way from Road A and provide internal access to the proposed parking areas. The Traffic Impact Study assessed potential impacts on the following four study intersections, including:

1. South Cloverdale Boulevard/Santana Drive
2. Santana Drive/U.S. Highway 101 Southbound On- and Off-Ramps
3. Santana Drive/U.S. Highway 101 Northbound On- and Off-Ramps
4. Road A/Dutcher Creek Road (Abrams, 2025)

The Traffic Impact Study assessed potential Level of Service (LOS) impacts under four traffic analysis scenarios for the four study intersections detailed above, including Existing Conditions, Existing Plus Project Conditions, Cumulative (2045) Conditions, and Cumulative Plus Project Conditions. Level of Service is defined as a qualitative scale used to describe operational conditions of a roadway or intersection, based on average delay and roadway capacity. The LOS scale ranges from A to F, with a rating of "A" representing free flow conditions and "F" indicating a breakdown in flow with excessive congestion and stop and go traffic (Abrams, 2025). In accordance with Policy CE 2-1 of Chapter 3.0 (Circulation) of the *City of Cloverdale General Plan*, the City strives to maintain a minimum LOS D rating during the weekday and evening peak periods. Trip generation forecasts indicate the Project would generate approximately 357 traffic trips per day, including approximately 30 vehicle trips during the weekday morning peak hour (7:30 to 8:30 a.m.) and 36 trips during the weekday evening peak hour (4:45 to 5:45 p.m.). Currently, conditions at the four study intersections during the morning and evening peak hours are at a LOS A or B. Under each of the traffic analysis scenarios, LOS is anticipated to remain at a LOS C or above in compliance with the City's standard (Abrams, 2025).

Transit, Pedestrian, and Bicycle Facilities

The Project area is served by Routes 60 and 68 of Sonoma County Transit, which provides regional service for trips to/from communities to the south (including Healdsburg, Windsor, and Santa Rosa) and intercity service, respectively. Two bus stops (Route 60) are currently located approximately one-third mile north of the Site at Sandholm Lane on each side of South Cloverdale Boulevard, with Route 68 stops located approximately 0.7 miles north of the Site along South Cloverdale Boulevard. To the south, a Route 60 bus stop (at Dutcher Creek Road and Hiatt Road) is located approximately 0.15 miles south of the Site. The Applicant has indicated that they are pursuing a partnership with Sonoma County Transit to submit for the Affordable Housing and Sustainable Communities (AHSC) program in order to increase the frequency of Route 60 and 68 services by purchasing additional electrical buses and construct bus charging infrastructure.

The Sonoma-Marin Area Rail Transit (SMART) provides additional transit service along Highway 101. While the rail line currently extends from Santa Rosa south to Larkspur, there are future plans for it to be extended north to Healdsburg and Cloverdale (Abrams, 2025).

As described in the Traffic Impact Study, bicycle and pedestrian facilities in the study area are currently limited. Notably, there are no bike lanes or sidewalks currently provided adjacent to the Site. Field observations indicate that walking and bicycling activity is limited in the immediate vicinity, likely due to lack of available facilities (Abrams, 2025). However, a Class II bicycle lane is provided north of the Site along South Cloverdale Boulevard, extending north from the northern portion of Kelly Road to South Street (SCTA, 2026[a]). In accordance with the Sonoma County Transportation Authority's (SCTA) Bike Route Map, Class II bicycle lanes are proposed to the south along Dutcher Creek Road, from Kelly Road to its connection with Dry Creek Road. A Class I shared-use path is also proposed along Kelly Road, north of the Site (2026[a]). Additionally, the SCTA's project list indicates sidewalks and bike lanes are proposed for completion on Cloverdale Boulevard, from the northern city limit to the southern city limit, with numerous other bicycle and pedestrian facility improvements proposed throughout the City of Cloverdale (SCTA, 2026[b]). Concrete sidewalk pedestrian walkways would also be provided throughout the subject Site.

IMPACT ANALYSIS

XVII.a) **Less Than Significant Impact.** There are no components of the Project that would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. As previously discussed under Section XIV (Population and Housing), above, the Project involves the construction of 53 residential units and a Wellness Center, which would be anticipated

to result in a maximum of 154 residents on-site. The Site would continue to be accessed off Kelly Road, via South Cloverdale Boulevard/Dutcher Creek Road.

When Project construction commences on-site, construction workers would be required at the Site. It is expected that construction of the Project would result in a slight increase in traffic to and from the Site, as construction workers would arrive and leave the Site at the beginning and end of the day, respectively, in addition to minor interruption of traffic on adjacent streets, when heavy equipment necessary for Project construction is brought to and removed from the Site. Per the Traffic Impact Study, it is estimated that approximately 40 construction workers may be required at peak construction, with deliveries, site visits, and other activities generating another 10-20 persons on-site. During the maximum peak construction period, it is estimated material import and export could generate approximately 5 truck trips per day (Abrams, 2025). Once construction is complete, the workers would no longer be required at the Site.

As provided in the Traffic Impact Analysis, development of the proposed residences and Wellness Center would not be expected to significantly impact the capacity of the street system, Level of Service (LOS) standards established by the City, or the overall effectiveness of the circulation system, nor substantially impact alternative transportation facilities, such as transit, bicycle, or pedestrian facilities. The Traffic Impact Analysis estimates that the proposed Project would generate 357 daily traffic trips, in which 30 trips (14 inbound and 16 outbound) would occur during the morning peak hour (7:30 to 8:30 a.m.) and 36 trips (19 inbound and 17 outbound) would occur during the evening peak hour (4:45 to 5:45 p.m.). As provided in the Traffic Impact Analysis, the study intersections are currently operating at an acceptable LOS and would continue to operate acceptably under all study scenarios. As previously described, pedestrian and bicycle facility improvements are currently planned within the City of Cloverdale, including within the vicinity of the Site. While additional transit ridership may occur as a result of the Project, no significant effects on transit capacity are anticipated as the additional ridership would be expected to occur primarily in the non-peak directions (Abrams, 2025). In addition, the Applicant has indicated that they are pursuing a partnership with Sonoma County Transit to submit for the AHSC program in order to increase the frequency of Route 60 and 68 services by purchasing additional electrical buses and construct bus charging infrastructure, which would minimize any potential impacts. No improvements are recommended in the Traffic Impact Analysis as a result of the proposed Project.

A less than significant impact would occur.

XVII.b)**Less Than Significant Impact.** The proposed Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), which states:

“(1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at

a programmatic level, a lead agency may tier from that analysis as provided in Section 15152."

Although the proposed Project is considered a land use project, the City of Cloverdale has not established a threshold with regard to VMT impact significance consistent with CEQA Guidelines Section 15064.3, subdivision (b). However, the Site is located approximately one-third mile south of two bus stops on each side of South Cloverdale Boulevard, adjacent to Dutcher Creek Road, which becomes South Cloverdale Boulevard north of the Site, a main thoroughfare through the City, 0.15 miles north of another bus stop located south of the Site along Dutcher Creek Road, and just over one-half mile south of the Highway 101 on- and off-ramps off Santana Drive. A less than significant impact would occur.

XVII.c) **Less Than Significant Impact.** The proposed Project would not be anticipated to substantially increase hazards due to design features or incompatible uses. The Project would be required to comply with all standards, including, but not limited to, site access, roadway width, and turning radii. As previously discussed, the proposed housing development and Wellness Center would be accessed off Kelly Road from Dutcher Creek Road via Road A. An internal access road (Road B) is also proposed, which would connect to Nopo Way from Road A and provide internal access to the proposed parking areas. All proposed roads would be designed to provide sufficient width and turning radii consistent with Cloverdale Municipal Code Chapter 15.14 Section 503.2.1, 503.2.3, and 503.2.4. A less than significant impact would occur.

XVII.d) **Less Than Significant Impact.** The proposed Project would not result in inadequate emergency access, as the proposed residences and Wellness Center would be required to meet pertinent design criteria to provide adequate emergency access in accordance with all design standards and requirements and would be evaluated by the City Engineering Department and Cloverdale Fire Protection District (CFPD) to ensure proposed access would be sufficient. "Implementation Policies PS 1-5" of the Public Health and Safety Element of the City of Cloverdale General Plan (2009, amended 2015) requires the Community Development Department to ensure that proposed development would provide adequate emergency vehicle access. In addition, the City coordinates with the CFPD to ensure that proposed development would be served by adequate fire protection service and all fair share fees are paid. Additionally, consistent with the General Plan Public Health and Safety Element and Municipal Code, all new construction would be required to meet California Fire Code requirements for fire detection and suppression.

As the Project would be provided with sufficient access and would comply with the applicable standards of the relevant agencies, the Project would not result in inadequate emergency access. A less than significant impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Transportation.

XVIII. TRIBAL CULTURAL RESOURCES. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §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:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1 (k)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

The Tribal Cultural Resources section identifies and evaluates a proposed project's potential impacts on Tribal Cultural Resources (TCRs), a distinct category of cultural resources established under CEQA by Assembly Bill 52 (AB 52), effective July 1, 2015. TCRs, as defined by Public Resources Code (PRC) Section 21074 (added by AB 52), include sites, features, places, cultural landscapes, sacred places, and objects of cultural value to a California Native American tribe. A resource can be considered a TCR if it is listed, or is eligible for listing, in the California Register of Historical Resources (CRHR) or a local register of historical resources. Alternatively, a resource may be determined to be a TCR if the lead agency, in its discretion and supported by substantial evidence, determines that the resource meets the definition of a TCR. This determination often involves considering whether the resource is a site, feature, place, cultural landscape, sacred place, or object that is traditional or cultural in nature to a California Native American tribe.

TCRs hold intangible cultural value to California Native American tribes, representing their heritage, traditions, and spiritual connections to the land. Unlike some archaeological or historical resources, TCRs may not always be evident through surface surveys or known to non-tribal cultural resource professionals. Therefore, their identification relies significantly on formal consultation with California Native American tribes, which is a key requirement of AB 52. The consultation process ensures that tribal perspectives, traditional knowledge, and unique cultural concerns are respectfully considered and integrated into the environmental review to ensure the adequate protection cultural assets.

The Applicant has defined the APE as the Project Site, shown on Figure 1 above. The APE is undeveloped but previously disturbed by Phase 1 of the Project.

Native American Heritage Commission Outreach

On December 9, 2025, the City contacted the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and the contact information for the representatives of the Native American tribes associated with the Project area. A response was received from the NAHC on December 9, 2025, which indicated that the results of the Sacred Lands File (SLF) search were positive and recommended contacting the Mishewal-Wappo Tribe of Alexander Valley for additional information. Included with the letter was a Native American contact list of tribes who may have knowledge of cultural resources in the Project area. A total of 24 Native American tribes were included on the NAHC contact list, which includes representatives from the Big Valley Band of Pomo Indians of the Big Valley Rancheria, Cahto Tribe, Cloverdale Rancheria of Pomo Indians, Coyote Valley Band of Pomo Indians, Dry Creek Rancheria of Pomo Indians (Project Applicant), Elem Indian Colony Pomo Indians, Estom Yumeka Maidu Tribe of the Enterprise Rancheria, Federated Indians of Graton Rancheria, Guidiville Rancheria of California, Hopland Band of Pomo Indians, Kashia Band of Pomo Indians of the Stewarts Point Rancheria, Koi Nation of Northern California, Lytton Rancheria, Manchester Band of Pomo Indians of the Manchester Rancheria, Middletown Rancheria of Pomo Indians of California, Mishewal-Wappo Tribe of Alexander Valley, Noyo River Indian Community, Pinoleville Pomo Nation, Potter Valley Tribe, Redwood Valley or Little River Band of Pomo Indians, Robinson Rancheria of Pomo Indians, Round Valley Reservation/Covelo Indian Community, Scotts Valley Band of Pomo, , and Yokayo Tribe.

Tribal Outreach

On December 11, December 15, December 16, and December 29, 2025, and January 5, January 6, January 8, and January 12, 2026, City staff sent a letter to 23 of the 24 tribes included on the Native American contact list received from the NAHC (excluding Dry Creek Rancheria, which is the Project Applicant) to inform them of the proposed development, results of the SLF search, and requested a response within 90 days if additional information was requested about the Project and/or to consult with the City. As of the date of this Initial Study, only one response was received from a representative of the Noyo River Indian Community, where it was indicated they have no input on the Project and are a Mendocino County Coastal Tribe. To date, no other responses have been received.

Cultural Resources Assessment

As described under Section V (Cultural Resources), above, a *Cultural Resources Survey and Assessment* (Cultural Resources Survey) was completed by Environmental Science Associates (ESA) on January 25, 2021 (on file and confidential). The Cultural Resources Survey included the properties included under both Phase 1 and Phase 2 of the Project. As part of the Cultural Resources Survey, a records search was completed at the Northwest Information Center (NWIC) at the Sonoma State University campus in Rohnert Park, California to determine if known cultural resources have been recorded within the APE or within a 0.5-mile radius and assess the likelihood for unrecorded cultural resources to be present within the APE. No recorded prehistoric cultural resources, prehistoric archaeological sites, or previously recorded historic-era cultural resources are located within the APE. Although three resources have been identified within an approximately 0.1-mile radius of the APE, ESA determined that none of the resources would be impacted by the Project. Although ESA concluded the Project has a low potential to uncover archaeological resources, the inadvertent discovery of cultural materials and human remains during ground disturbing activities has the potential to occur. As a result, ESA recommended inclusion of the inadvertent discovery protocol, which includes standard protocol to follow in the event such resources are encountered during development of the Project; see Mitigation Measure CUL-1, below (ESA, 2021).

IMPACT ANALYSIS

XVIII.a.i-ii) Less Than Significant Impact with Mitigation Incorporated. The Applicant has defined the APE as the Project Site, shown on Figure 1, above. The APE is undeveloped but partially disturbed by the construction activities done for Phase 1 of the Project.

As noted above, in December 2025 and January 2026, respectively, the City invited the Native American tribes included on the NAHC contact list (excluding Dry Creek Rancheria, the Project Applicant) to consult on the Project pursuant to Assembly 52. To date, only one response was received from a representative of the Noyo River Indian Community, where it was indicated they have no input on the Project and are a Mendocino County Coastal Tribe. As of the date of this Initial Study, no other responses have been received.

As no TCRs have been documented or identified in the APE, previous disturbance at the Site, and low potential to uncover archaeological resources, as concluded by the 2021 Cultural Resources Study (ESA, 2021), it is not anticipated that the Project would affect tribal cultural resources. However, there is a chance that tribal cultural resources may be inadvertently discovered during construction. Therefore, the inclusion of Mitigation Measures TCR-1 and CUL-1 (as set forth under Section V, Cultural Resources, above) would reduce the potential for significant impacts to unknown TCRs to a level that is less than significant with mitigation incorporated.

MITIGATION MEASURES

TCR-1: Prior to the start of grading operations for the Project, the Project developer or their representative shall provide reasonable notice and site access to the culturally affiliated tribe for a tribal monitor to be present during ground disturbing activities with the potential to encounter cultural resources of Native American origin or association. If archaeological resources (i.e., sites, features, or artifacts) are exposed during construction activities, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, in coordination with the tribal monitor if prehistoric in nature, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the nature of the find, the archaeologist and tribal monitor (if a resource is prehistoric in age) may simply record the find to appropriate standards (thereby addressing any data potential) and allow work to continue. If the archaeologist determines the discovery to be potentially significant under CEQA or the tribal monitor identifies a potential Tribal Cultural Resource (TCR), additional efforts such as preparation of a treatment plan, testing, and/or data recovery may be warranted prior to allowing construction to proceed in this area. All management strategies recommended by the archaeologist and/or culturally affiliated tribe must be approved by the City of Cloverdale Planning & Community Development Department. The developer shall then adhere to the management strategies approved by the City. Ground-disturbing activities may resume once the management strategies have been implemented to the satisfaction of the City's Community Development Director and the qualified archaeologist.

Also see Mitigation Measure CUL-1 in Section V, Cultural Resources.

FINDINGS

The proposed Project would have a **Less Than Significant Impact with Mitigation Incorporated** on Tribal Cultural Resources.

XVIX. UTILITIES AND SERVICE SYSTEMS. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

The City of Cloverdale would serve the proposed Project with potable water service for both fire protection and domestic water needs, and wastewater and stormwater collection service. The extension of these services to the Site were planned in the City of Cloverdale Water and Sewer System Master Plan Updates in 2010 and 2009, respectively, denoting a long term plan and intent to develop this Site.

Water Service

As noted above, water would be provided to the Site by the City of Cloverdale. According to the 2015 Urban Water Management Plan (UWMP), the City of Cloverdale's water distribution system is supplied by treated groundwater under direct surface water influence, per its pre-1914 water rights. This water is supplied by seven (7) wells under the direct influence of the Russian River and is treated at the City's Water Treatment Plant (WTP) located near the Russian River. The City of Cloverdale has water rights to 413 million gallons (MG) per year (City of Cloverdale, 2015). According to the UWMP, the City's pre-1914 water rights position it well to meet any future demands regardless of water year type. Due to the City's plans for future water conservation programs, ordinance changes to the Municipal Code, and the City's demand management measures, the City's total water use is projected to be relatively stable, even as the population is projected to grow to about 11,500 residents in 2014 (City of Cloverdale, 2015). As of 2015, the City of Cloverdale supplied approximately 344 MG to 3,342 municipal connections.

As depicted on Figure 4, the Master Water Plan for the City of Cloverdale, the Site is located within Pressure Zone 3 of the City of Cloverdale Water System and the future build-out of a 12-inch water main to serve properties in the Project vicinity were conceptualized in the 2010 City of Cloverdale Water System Master Plan Update (Water Plan Update). The Water Plan Update analyzed the land use and zoning information

from the City of Cloverdale General Plan (2009, amended 2015) to determine the net water demand increase for both residential and non-residential uses at build-out.

Wastewater Collection Service

Wastewater generated at the Site would be collected by the City of Cloverdale and treated at the Cloverdale Wastewater Treatment Plant (WWTP). According to the 2009 City of Cloverdale Sewer System Master Plan Update (Sewer Plan Update), the average daily effluent flows into the WWTP was 0.53 million gallons per day (MGD), the average wet weather flow was 0.71 MGD, and the average dry weather flow was 0.35 MGD (City of Cloverdale – Public Works, 2009). The average daily dry weather capacity of the WWTP is 1.0 MGD, with a peak dry weather capacity of 2.20 MGD and peak wet weather capacity of 8.25 MGD. The Sewer Plan Update (2009) addressed potential growth in the City in accordance with the land use and zoning information from the City of Cloverdale General Plan (2009, amended 2015), which the Sewer Plan Update Notes, includes the City's plans to increase its population to a total of 12,000 residents. The wastewater model prepared as part of this Sewer Plan Update indicates that the current WWTP is sufficient to handle the average wet and dry weather flows associated with the increased loading; however, the WWTP capacity falls short of handling peak loading in both the wet and dry seasons at complete buildout. The Sewer Plan Update recommends that the City reevaluate the wastewater flows into the WWTP and conduct another Sewer Master Plan Update to identify any changes in the loading criteria when the population has reached approximately 10,000 residents.

As depicted on the City of Cloverdale Sewer Zones Map (see Figure 5), the Site is located within Sewer Zone II. The extension of City sewer services to the Project area and the installation of a pump station northeast of the Site at the intersection of Kelly Road and South Cloverdale Boulevard were anticipated in the 2009 City of Cloverdale Sewer System Master Plan Update.

Storm Drainage Service

As discussed in Section IX (Hydrology and Water Quality), above, the City of Cloverdale, along with the County of Sonoma and various cities in Sonoma County, is a co-permittee on a Phase 1 Municipal Separate Storm Sewer System (MS4) General Permit that regulates stormwater discharges into its stormwater conveyance system, exempts specific non-stormwater discharges, and requires that Low Impact Development (LID) measures be implemented into project design.

Drainage at the Site occurs through surface swales, sheet flow, and percolation. The Biological Report prepared by ESA in February 2026 (see Appendix F) identified a northeast-flowing ephemeral drainage swale system in the study area that appears to run east toward Dutcher Creek Road. According to the City of Cloverdale Storm Drain Map, a 48-inch storm drain currently runs along the east side of Dutcher Creek Road. A 48-inch Reinforced Concrete Pipe (RCP) runs perpendicular to Dutcher Creek Road, conveying flows from the on-site ephemeral drainage to the existing storm drain system.

The installation of new storm drain inlets and improvements to existing culverts are proposed, due to the anticipated change in drainage patterns associated with the proposed Project, associated roads and infrastructure, and increase in impervious surfaces on-site. As shown on the Preliminary Civil Plans (see Appendix B), stormwater would be collected at points throughout the Site and would be directed to a proposed on-site storm drain system that would outlet on the northeast side of the Site. Stormwater would be directed and controlled via several Site improvements, including three bioswales and a detention pond along the northern boundary of the Site. These features would be designed and located to allow infiltration, water detention, and natural filtration of stormwater on-site. The installation of a new 36-inch culvert extension from the west would carry runoff from upstream (off-site) under the proposed road and outlet to the east.

Solid Waste Service

Solid waste in the City of Cloverdale is collected and transported to landfill sites outside Sonoma County, such as Potrero Hills, Keller Canyon Landfill, and Vasco Road Sanitary Landfill, by Recology. These landfills have approximately 13.9 million cubic yards (MCY), 63.4 MCY, and 11.5 MCY of remaining capacity, respectively (CalRecycle, 2025).

Electric Power and Natural Gas

Sonoma Clean Power provides electric generation service to the City of Cloverdale, while Pacific Gas & Electric (PG&E) is responsible for the delivery of electricity through the existing grid. There would also be on-site solar power generation and photovoltaic storage on building roofs, with the goal of significantly reducing reliance on the power grid and the utility cost for tenants. Additionally, the Project is not proposing development of natural gas infrastructure, all facilities would utilize electricity.

Telecommunications

Various telecommunication companies provide telecommunications to the City of Cloverdale.

IMPACT ANALYSIS

XVIX.a) **Less Than Significant Impact.** As discussed above, the infrastructure necessary for water, wastewater, and stormwater connections would be installed as part of the proposed Project. In addition, the expansion of City water and wastewater collection systems to the Site was conceptualized by the City in its City of Cloverdale Water and Sewer System Master Plan Updates in 2010 and 2009, respectively. Although impervious surfaces, including both structures and roads, are included in the proposed Project, potential impacts to stormwater runoff from the Site would be compensated for with the installation of bioretention structures proposed throughout the Site, such that the construction of new stormwater facilities off-site would not be required. These bioretention structures would be designed to mimic stormwater benefits of the natural environment, reduce peak runoff flow, and remove potential pollutants from stormwater flow before it enters the storm drain system and would be constructed in compliance with the City of Cloverdale Phase I MS4 program requirements. As the construction of expanded City water and wastewater facilities has been thoroughly evaluated and proposed by the City of Cloverdale, no existing utilities would be removed or relocated as part of the proposed Project, and the introduction of impervious surfaces would be compensated for with LID features designed to the applicable standards, a less than significant impact would occur.

XVIX. b) **Less Than Significant Impact.** The City of Cloverdale receives its municipal water supply from a combination of Russian River diversions and groundwater wells within the Cloverdale Groundwater Basin. The 2010 Urban Water Management Plan projects adequate supply to meet build-out of the General Plan, which includes residential development not yet planned or developed. The Project would result in an incremental increase in water demand from 53 residential units and a community facility, which is consistent with land uses generally anticipated in the General Plan and factored into long-term supply planning.

XVIX. c) **Less Than Significant Impact.** The City of Cloverdale Wastewater Treatment Plant (WWTP) provides treatment for municipal customers and has an average dry weather flow capacity of approximately 1.0 million gallons per day (mgd). Current average flows are below this threshold, and the facility has sufficient permitted capacity to accommodate incremental growth consistent with the General Plan. Wastewater generated by the Project would consist of typical domestic flows from residential units and the Wellness Center, and would not exceed the City's available treatment capacity. As such, the Project would not result in inadequate capacity at the City's WWTP, the impact would be less than significant.

XVIX. d-e) **Less Than Significant Impact.** The Site would be served by Recology, the current solid waste provider in the City of Cloverdale. Solid waste is currently collected and transported to landfill sites outside Sonoma County, such as Potrero Hills, Keller Canyon Landfill, and Vasco Road Sanitary Landfill, which have sufficient permitted capacity, as provided above, to accommodate the Project's solid waste disposal needs at full Project build-out. A significant amount of solid waste would not be anticipated under the Project and all solid waste generated under the Project would be disposed of in accordance to all federal, State, and local statutes and regulations related to solid waste. Additionally, solid waste disposal would follow the requirements of Recology, which must adhere to federal, State, and local statutes and regulations related to the collection of solid waste. The Project would comply with all State and local waste diversion requirements including Cloverdale Municipal Code Chapter 8.12, related to the collection, disposal, and processing of solid waste, recyclables, and compostable materials. As such, the proposed would not negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals. A less than significant impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Utilities and Service Systems.

XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 challenges?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

The Site was annexed into the City of Cloverdale on September 7, 2021, and is located within a Local Responsibility Area (LRA) for fire protection. According to the Office of the State Fire Marshal's (OSFM) recommended Fire Hazard Severity Zone maps (February 24, 2025), the Site is designated as a Very High Fire Hazard Severity Zone (VHFHSZ) (Cal Fire OSFM, 2025).

Fire protection services within the City of Cloverdale and surrounding rural area are provided by the Cloverdale Fire Protection District (CFPD), which operates as part of the Northern Sonoma County Fire Protection District (North County Fire) through a Joint Powers Agreement. The CFPD maintains a staffed station located approximately 1.9 miles north of the Site and provides fire suppression, emergency medical response, and rescue services (Cloverdale Fire Protection District, 2025). CFPD firefighters also assist in staffing the Cloverdale Health Care District's Ambulance, with EMT-1 trained drivers often serving as cross-staff for ambulance operations. When the primary ambulance is unavailable due to patient transport, CFPD provides back-up staffing to ensure continuity of emergency response services (Sonoma County, 2021).

The CFPD is currently comprised of 14 paid sworn firefighters, two support administrative staff, and 21 volunteer firefighters, and contains the following equipment (Cloverdale Fire Protection District, 2025):

- Engine, 6580
- Engine, 6581
- Engine, 6570
- Engine, 6560
- Engine, 6530
- Engine, 6531
- Water Tender/Pump, 6590
- Fire Chief's Command Vehicle, C6500
- Command Vehicle, B65
- Administrative Transport Vehicle, U6540

As such, while the Site is located within a designated Very High Fire Hazard Severity Zone in the LRA, it is served by an established local fire protection agency with regional mutual aid agreements, proximity to staffed fire

and ambulance facilities, and access to primary evacuation routes via Dutcher Creek Road, Kelly Road, and South Cloverdale Boulevard/Highway 101.

IMPACT ANALYSIS

XX.a) **Less Than Significant Impact.** On August 11, 2021, the City Council of Cloverdale adopted the County of Sonoma Public Safety Power Shutoff Annex to the City of Cloverdale Emergency Operations Plan (EOP) (City of Cloverdale 2021). As previously discussed, the Site (APN: 117-040-107) is located within the City of Cloverdale and has direct access to Dutcher Creek Road and Kelly Road, which connect to South Cloverdale Boulevard and Highway 101, the primary regional evacuation route identified in Sonoma County including the EOP, the Multi-Jurisdictional Hazard Mitigation Plan, and the City of Cloverdale Evacuation Zone Map (City of Cloverdale, 2020; Sonoma County, 2021; City of Cloverdale, No Date[b]). Development of the Site would include internal circulation improvements connecting to the existing roadway system. The Project would not require closure or re-routing of regional evacuation routes. Construction activities would be temporary and subject to standard traffic control measures to maintain emergency vehicle access. As such, the Project would not impair an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

XX.b) **Less Than Significant Impact.** As previously discussed, the Site is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in the Local Responsibility Area (Cal Fire OSFM, 2025). The parcel is generally flat to gently sloping and lacks steep terrain that would exacerbate wildfire spread. While the Project would introduce residential and community-serving uses in an area with elevated wildfire risk, development would replace disturbed land with urban improvements, landscaping, and access roads that reduce fuel continuity.

Compliance with California Building Code Chapter 7A (Ignition-Resistant Construction) and Public Resources Code §4291 (Defensible Space) would be required. These measures, combined with fire protection services provided by the Cloverdale Fire Protection District (CFPD), reduce the likelihood that development of the Site would exacerbate wildfire risk. Additionally, pursuant to Policy PS 5-12 of the Public Health and Safety Element of the City of Cloverdale General Plan (2009, amended 2015), all new development, including single-family residences, such as proposed under the Project, are required to provide built-in fire protection, including automatic fire sprinklers. Lastly, the CFPD would require the preparation of a vegetation management plan. Through compliance with existing standards and policies, potential impacts would be limited. A less than significant impact would occur.

XX.c) **Less Than Significant Impact.** As the proposed Project entails the development of 53 affordable housing units and a Behavioral Health and Wellness Center, with internal circulation improvements connecting to existing public streets. These roadways would improve access for firefighting equipment and emergency evacuation. The Project would be sufficiently served by water utilities, as described in Section XIX (Utilities and Service Systems), above, and is within the service boundaries of the CFPD. Project design has accounted for proper road width and turn radius needs for emergency vehicles, as required by the California Fire Code, and Cloverdale Municipal Code Chapter 15.14 – Sections 503.2.1, 503.2.3, and 503.2.4. Given the small size of the Project and the proposed use, the proposed Project would not trigger the need for any installation of fire-related utilities (e.g., emergency water supplies), fire roads, fire breaks, or other facilities that would exacerbate fire risk or emergency response needs or cause temporary or ongoing impacts to the environment. Furthermore, new electrical power lines on the Site would be installed below ground, minimizing potential ignition and related fire risk, and all contractors would implement standard BMPs and take proper precautions to ensure fire risk is minimized during installation and maintenance of associated infrastructure. A less than significant impact would occur.

XX.d) **No Impact.** The proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage challenges, as the area of development is relatively flat in nature and is not significantly developed. Additionally, there is no evidence on-site of recent wildfires at the Site or in the immediate vicinity. No impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Wildfire.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

Certain mandatory findings of significance must be made to comply with CEQA Guidelines §15065. The proposed Project has been analyzed and it has been determined that it would not:

- Substantially degrade environmental quality;
- Substantially reduce fish or wildlife habitat;
- Cause a fish or wildlife population to fall below self-sustaining levels;
- Threaten to eliminate a plant or animal community;
- Reduce the numbers or range of a rare, threatened, or endangered species;
- Eliminate important examples of the major periods of California history or pre-history;
- Achieve short term goals to the disadvantage of long term goals;
- Have environmental effects that will directly or indirectly cause substantial adverse effects on human beings; or
- Have possible environmental effects that are individually limited but cumulatively considerable when viewed in connection with past, current, and reasonably anticipated future projects.

Potential environmental impacts from implementation of the proposed Project have been analyzed and mitigation measures have been included to ensure impacts would be held to a less than significant level.

IMPACT ANALYSIS

XXI.a) **Less Than Significant Impact with Mitigation Incorporated.** The Project does not 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. There are no important examples of California pre-history or history located on the Site.

Mitigation has been applied to reduce any potential environmental impacts to levels that are less than significant. Although tree or shrub removal is expected to be minimal under the Project, it is noted in the Biological Report that the non-native grassland may provide low-quality habitat for small mammals, reptiles, and nesting birds. Should vegetation removal and/or grading be proposed between February 1 and August 31, a nesting bird survey would be required prior to these activities (ESA, 2026) in accordance with Mitigation Measure BIO-1. As the Project has the potential to impact potentially jurisdictional waters on the subject Site, Mitigation Measure BIO-2 has been included to require the Application design the Project such that it would not result in a loss of water of the United States or wetlands, by providing mitigation through impact avoidance, impact minimization, and/or compensatory mitigation for the impact. Additionally, there is the potential for unrecorded archaeological and Native American resources and/or human remains to be located on-site and inadvertently encountered during Project construction. CEQA Guidelines §§15064.5(d) and (f) and PRC §5097.98 provide proper protocol in the event of inadvertent discovery of archaeological or human remains on-site during Project construction and required compliance with these protocols provided in Mitigation Measures CUL-1 and TCR-1 would ensure impacts would be less than significant.

With mitigation incorporated, a less than significant impact would occur.

XXI.b) **Less Than Significant Impact.** No cumulative impacts have been identified as a result of the proposed Project. As noted above, all impacts associated with the proposed 53-unit residential housing development and Wellness Center have been evaluated and individual impacts from the Project would not significantly contribute to cumulative impacts in the area. A less than significant impact would occur.

XXI.c) **Less Than Significant Impact with Mitigation Incorporated.** The Project would not have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly. Mitigation has been applied to reduce any potential impacts related to inadvertent discovery of cultural and tribal cultural resources, and construction noise impacts on nearby sensitive receptors. Based on the findings in this Initial Study and as mitigated and conditioned, the proposed Project would not have environmental effects that would cause substantial adverse effects on human beings either directly or indirectly. Potential environmental impacts associated with approval of the Project have been analyzed and, as mitigated, all potential impacts can be reduced to a less-than-significant level.

MITIGATION MEASURES

Refer to Mitigation Measures BIO-1 through BIO-2 in Section IV (Biological Resources), CUL-1 in Section V (Cultural Resources), NOISE-1 in Section XIII (Noise), and TCR-1 in Section XVIII (Tribal Cultural Resources), above.

FINDINGS

The proposed Project would have a **Less Than Significant Impact with Mitigation Incorporated** on Mandatory Findings of Significance.

VI. REFERENCES

- Abrams Associates Traffic Engineering, Inc. December 3, 2025. *Traffic Impact Study: 27821 Dutcher Creek Road, City of Cloverdale*. (Appendix I)
- American Lung Association. 2025. *State of the Air 2025*. Accessed September 16, 2025. Available at: <https://www.lung.org/research/sota>.
- Bay Area Air Quality Management District (BAAQMD). 2022. *2022 CEQA Guidelines: Thresholds of Significance*. Accessed September 16, 2025. Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-3-thresholds_final_v2-pdf.pdf?rev=a976830cce0c4a6bb624b020f72d25b3&sc_lang=en.
- California Air Resources Board (CARB). 2018. *Assembly Bill 32 Overview*. Accessed September 16, 2025. Available at: <https://www.arb.ca.gov/cc/ab32/ab32.htm>.
- California Air Resources Board (CARB). September 20, 2024. *California Greenhouse Gas Emissions from 2000 to 2022: Trends of Emissions and Other Indicators*. Accessed September 16, 2024. Available at: https://ww2.arb.ca.gov/sites/default/files/2024-09/nc-2000_2022_ghg_inventory_trends.pdf.
- California Air Resources Board (CARB). 2025 [a]. *2022 Scoping Plan Documents*. Accessed September 26, 2025. Available at: <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents>.
- California Air Resources Board (CARB). 2025 [b]. *AB 32 Climate Change Scoping Plan - About*. Accessed September 16, 2025. Available at: <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/about>.
- California Air Resources Board (CARB). 2025 [c]. *Common Air Pollutants*. Accessed September 16, 2025. Available at: <https://ww2.arb.ca.gov/resources/common-air-pollutants>.
- California Air Resources Board (CARB). 2025 [d]. *Current California GHG Emission Inventory Data. 2000-2020 GHG Inventory (2024 Edition)*. Accessed September 16, 2025. Available at: <https://ww2.arb.ca.gov/ghg-inventory-data>.
- California Air Resources Board (CARB). 2025 [e]. *GHG 1990 Emissions Level & 2020 Limit*. Accessed September 16, 2025. Available at: <https://ww2.arb.ca.gov/ghg-2020-limit#:~:text=The%202020%20GHG%20emission%20limit,gas%20emissions%20level%20in%201990>.
- California Air Resources Board (CARB). 2025 [f]. *GHGs Descriptions & Sources in California*. Accessed September 26, 2025. Available at: <https://ww2.arb.ca.gov/ghg-descriptions-sources>.

- California Code of Regulations (CCR). 2010. Title 22, Division 4.5, Chapter 11, §§66261.20–66261.24 – *Characteristics of Hazardous Waste*. Accessed September 18, 2025. Available at: <https://dtsc.ca.gov/title22/>.
- California Department of Fish and Wildlife (CDFW). 2025. *Nesting Birds Q and A*. Accessed September 18, 2025. Available at: <https://wildlife.ca.gov/COQA/tag/nesting-birds>.
- California Department of Forestry and Fire Protection (CAL FIRE). February 24, 2025. *City of Cloverdale – Sonoma County Local Responsibility Area Fire Hazard Severity Zones*. Accessed September 17, 2025. Available at: https://cloverdalefire.specialdistrict.org/files/4cfbbe8bc/FHSZ_City_LRA_11x17_Cloverdale.pdf.
- California Department of Resources Recycling and Recovery (CalRecycle). 2025. *SWIS Facility/Site Search*. Accessed September 18, 2025. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>.
- California Department of Toxic Substances Control (DTSC). 2025. *EnviroStor Database*. Accessed August 28, 2025. Available at: <https://www.envirostor.dtsc.ca.gov/public/>.
- California Department of Transportation (Caltrans). 2020. *California State Scenic Highway Program*. Accessed September 15, 2025. Available at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.
- California Environmental Protection Agency (CalEPA). 2023. *Cortese List (Gov. Code §65962.5)*. Accessed September 18, 2025. Available at: <https://dtsc.ca.gov/website/cortese-list/>.
- California Emissions Estimator Model (CalEEMod). Available at: <http://www.caleemod.com/>.
- California Energy Commission (CEC). October 2017. *California Energy Commission Final Commission Report - Senate Bill 350: Doubling Energy Efficiency Savings by 2030*. Accessed January 20, 2026. Available at: <https://efiling.energy.ca.gov/lists/docketlog.aspx?docketnumber=17-iepr-06>.
- California Geological Survey (CGS). 2013. *Updated Mineral Land Classification Map for Portland Cement Concrete-Grade Aggregate in the North San Francisco Bay Production-Consumption Region, Marin, Napa, Sonoma, and Southwestern Solano Counties, California*. Accessed September 18, 2025. Available at: https://filerequest.conservation.ca.gov/?q=SR_205.
- California Geological Survey (CGS). 2022. *Fault Activity Map of California*. Accessed September 18, 2025. Available at: <https://maps.conservation.ca.gov/cgs/fam/>.
- California Health and Safety Code. 2024. §25117 – *Hazardous Waste Definition*. Accessed September 18, 2025. Available at: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=25117.&lawCode=HSC.

City of Cloverdale. Revised March 2004. *Subdivision General Notes*. Accessed September 16, 2025. Available at: <https://www.cloverdale.net/DocumentCenter/View/1635/3-Subdivision-General-Notes?bidId=>.

Cloverdale Fire Protection District. 2025. *About Us*. Accessed on September 18, 2025. Available at: <https://cloverdalefire.specialdistrict.org/about-us>.

City of Cloverdale. May 2009, amended January 28, 2015. *City of Cloverdale General Plan*. Accessed September 10, 2025. Available at: <http://www.cloverdale.net/DocumentCenter/Home/View/537>.

City of Cloverdale. 2019. Chapter 18.17 – Tree Preservation. *Cloverdale Municipal Code*. Accessed September 10, 2025. Available at: <https://ecode360.com/48031025#48031025>.

City of Cloverdale. 2009. *City of Cloverdale Sewer Master Plan Update*. Accessed September 10, 2025. Available at: <https://www.cloverdale.net/DocumentCenter/View/1328/Sewer-Master-Plan-Update---overall-report?bidId=>.

City of Cloverdale. 2010. *City of Cloverdale Water System Master Plan Update*. Accessed September 10, 2025. Available at: <https://www.cloverdale.net/DocumentCenter/View/1325/WMP-Report-FINAL?bidId=>.

City of Cloverdale. No Date[a]. *Police*. Accessed September 17, 2025. Available at: <https://cloverdale.net/78/Police>.

City of Cloverdale. No Date[b]. *Cloverdale Evacuation Zone Map*. Accessed September 18, 2025. Available at: <https://www.cloverdale.net/DocumentCenter/View/4638/City-of-Cloverdale-Evacuation-Zone-Map>.

City of Cloverdale. January 2020. *Emergency Operations Plan – City of Cloverdale*. Accessed September 18, 2025. Available at: https://www.cloverdale.net/DocumentCenter/View/4869/City-of-Cloverdale-EOP_January_2020x.

City of Cloverdale. 2024. *Cloverdale Municipal Code, Title 18 (Zoning)*. Available at: <https://www.codepublishing.com/CA/Cloverdale/>.

City of Santa Rosa. No Date. *Cloverdale California GIS Viewer*. Accessed September 18, 2025. Available at: <https://maps.srcity.org/Html5Viewer/Index.html?viewer=Cloverdale>.

Cloverdale Fire Protection District. 2025. *About Us*. Accessed September 18, 2025. Available at: <https://cloverdalefire.specialdistrict.org/about-us>.

County of Sonoma. October 2021 [a]. *Sonoma County Multijurisdictional Hazard Mitigation Plan Update 2021*. Accessed September 18, 2025. Available at: <https://permitsonoma.org/hazard-mitigation>.

County of Sonoma. October 2021 [b]. *Multi-Jurisdiction Hazard Mitigation Plan – Cloverdale Fire Protection District Annex*. Permit Sonoma, Santa Rosa, CA. Accessed September 18, 2025. Available at: <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Long%20Range%20Plans/Haz>

[ard%20Mitigation%20Plan/Sonoma-County-2021-MJHMP-Volume-2-Cloverdale-Fire-Protection-District-Annex.pdf](#).

County of Sonoma. 2025. *ActiveMap Viewer Collection – Zoning and Land Use*. Accessed September 12, 2025. Available at: <https://sonomacounty.ca.gov/PRMD/Administration/GIS/ActiveMap/>.

County of Sonoma. 2018. *Williamson Act Contracts – Map Gallery*. Accessed September 18, 2025. Available at: <https://sonomacounty.ca.gov/development-services/permit-sonoma/tools-services/maps-gis/williamson-act-contracts>.

Department of Conservation (DOC). 2022. *Farmland Mapping and Monitoring Program (FMMP), Sonoma County Important Farmland Map*. California Department of Conservation, Division of Land Resource Protection. Accessed September 18, 2025. Available at: <https://maps.conservation.ca.gov/DLRP/CP/>.

Economic & Planning Systems, Inc. August 2005. *County of Sonoma Fire Protection Service Providers Municipal Service Review*. Accessed September 17, 2025. Available at: https://sonomalafco.org/Microsites/LAFCO/Documents/Archive/Reports/Final_Municipal-Service-Reviews_fire.pdf.

Environmental Science Associates (ESA). February 6, 2026. *27821 Dutcher Creek Road Biological Resources Evaluation and Survey*. (Appendix F)

Environmental Science Associates (ESA). January 25, 2021. *Bi'Du Khaale Housing Project – Cultural Resources Survey and Assessment*. (on file and confidential)

Environmental Science Associates (ESA). May 17, 2025. *Phase I Environmental Site Assessment Update; Dutcher Creek Parcel (APN 117-040-107), 27821 Dutcher Creek Road, Cloverdale, California*. (Appendix H)

Federal Emergency Management Agency (FEMA). No Date. *National Flood Hazard Layer FIRMette (Firm) Panel No. 06097C0119E, effective December 2, 2008*. Accessed September 17, 2025. Available at: <https://msc.fema.gov/portal/search?AddressQuery=1609%20Nopo%20Way%2C%20Cloverdale%2C%20CA%2095425>.

Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*. Accessed September 18, 2025. Available at: <https://www.transit.dot.gov/regulations-and-guidance/environmental-programs/noise-and-vibration>.

Google, LLC. 2025. *Google Earth Pro, Version 7.3.6. Cloverdale, CA. Imagery date: August 18, 2024*. Accessed September 18, 2025. Available at: <https://www.google.com/earth/versions/#earth-pro>.

Natural Resources Conservation Service (NRCS). 2025. *Web Soil Survey – Custom Soil Resource Report for APN 117-040-107, Sonoma County, California*. United States Department of Agriculture. Accessed September 18, 2025. Available at: <https://websoilsurvey.nrcs.usda.gov/>.

Northern Sonoma County Air Pollution Control District (NoSoCoAir). April 30, 2018. RE: AB617 – Community Air Pollution Program (CAPP) Recommendation. Accessed September 16, 2025. Available at: <https://ww2.arb.ca.gov/sites/default/files/2018-05/Northern%20Sonoma%20CAPCD%20AB617%20CAPP%20Recommendation%204-30-2018.pdf>.

Northern Sonoma County Air Pollution Control District (NoSoCoAir). 2022. 2023 Ambient Air Quality Standards Report. Accessed September 16, 2025. Available at: <https://nosocoair.org/air-quality/>.

Northern Sonoma County Fire Protection District (North County Fire). 2025. About Us. Accessed September 17, 2025. Available at: <https://cloverdalefire.specialdistrict.org/about-us>.

Reese and Associates, Inc. October 14, 2025. Soil Engineering Consultation Supplemental Recommendations and Report Update; Bi'Du Khaale Phase 2 – Revised Location; Cloverdale, California. (Appendix G)

Sonoma County. 2021. Multi-Jurisdiction Hazard Mitigation Plan – Cloverdale Fire Protection District Annex. Accessed September 18, 2025. Available at: <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Long%20Range%20Plans/Hazard%20Mitigation%20Plan/Sonoma-County-2021-MJHMP-Volume-2-Cloverdale-Fire-Protection-District-Annex.pdf>.

Sonoma County. October 11, 2024. Airport Referral Areas within Sonoma County as established by the Airport Land Use Commission (ALUC). Accessed September 18, 2025. Available at: <https://www.arcgis.com/apps/mapviewer/index.html?layers=fe8a2c7b3c9b4f029a49d6d75550be6c>.

Sonoma County Regional Climate Protection Authority (RCPA). July 2016. Climate Action 2020 and Beyond. Accessed September 16, 2025. Available at: <https://rcpa.ca.gov/what-we-do/climate-action-2020/>.

Sonoma County Regional Climate Protection Authority (RCPA). Updated July 8, 2024. Greenhouse Gases, Greenhouse Gas Inventory. Sonoma County Greenhouse Gas Inventory – 2022 Update. Accessed September 26, 2025. Available at: <https://rcpa.ca.gov/wp-content/uploads/2024/06/RCPA-GHG-Inventory-Update-2022-Full-Report-FINAL-2024-07-08.pdf>.

Sonoma County Transportation Authority (SCTA). 2026[a]. Bike Route Map. Accessed January 29, 2026. Available at: <https://scta.ca.gov/planning/countywide-active-transportation-plan/bike-route-map/>.

Sonoma County Transportation Authority (SCTA). 2026[b]. Updated Project List 2019. Accessed January 29, 2026. Available at: <https://scta.ca.gov/planning/countywide-active-transportation-plan/#updated-project-list-2019>.

State of California. Office of Environmental Health Hazard Assessment (OEHHA). 2025. Greenhouse Gas Emissions. Accessed September 26, 2025. Available at: <https://oehha.ca.gov/climate-change/epic-2022/climate-change-drivers/greenhouse-gas-emissions>.

State Water Resources Control Board (SWRCB). 2023. *Construction General Permit (Order 2009-0009-DWQ, as amended)*. Accessed September 18, 2025. Available at: https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html.

State Water Resources Control Board (SWRCB). 2025. *GeoTracker Database*. Accessed August 28, 2025. Available at: <https://geotracker.waterboards.ca.gov/>.

U.S. Census Bureau, Department of Commerce. No Date. *Cloverdale city, California*. Accessed September 10, 2025. Available at: https://data.census.gov/profile/Cloverdale_city,_California?q=160XX00US0614190#populations-and-people.

U.S. Department of Transportation, Federal Highway Administration (FHWA). 2017. *Traffic Noise Model and Highway Traffic Noise: Analysis and Abatement Guidance*. Accessed September 18, 2025. Available at: https://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/.