

5. ALTERNATIVES

5.1 PURPOSE

The purpose of the alternatives analysis is to assess a range of reasonable alternatives to the proposed project that would feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant impacts of the project and to evaluate the comparative merits of each alternative (*CEQA Guidelines* Section 15126.6). The *Guidelines* state that the selection of alternatives should be governed by a “rule of reason.” Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered (*CEQA Guidelines* Section 15126.6[a]). When addressing feasibility, Section 15126.6 of the *CEQA Guidelines* states, “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, jurisdictional boundaries....”

Based on the *CEQA Guidelines*, several factors must be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include (1) the nature of the significant impacts of the proposed project, (2) ability of alternatives to avoid or lessen the significant impacts associated with the project, (3) the ability of the alternatives to meet the objectives of the project, and (4) the feasibility of the alternatives. The alternatives analysis methodology, reasoning behind the selection of alternatives, alternatives rejected as infeasible are described below.

5.2 METHODOLOGY

The alternatives analysis is presented as a comparative analysis to the project. Each alternative is considered in light of the project objectives to determine whether the alternative would feasibly attain most of the basic project objectives, and whether it would avoid or substantially lessen any of the significant impacts of the project. Impacts associated with the alternatives are compared to project-related impacts and are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the project.

CEQA also states that, “the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.” Generally, significant impacts of an alternative are discussed in this section, but in less detail than the proposed project, and should provide decision makers perspective as well as a reasoned choice regarding each alternative.

The following alternatives analysis compares the potential significant environmental impacts of the alternative with those of the proposed project for each of the environmental topics analyzed in Sections 4.1 through 4.11 (Environmental Impact Analysis) of the EIR.

5.2.1 Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the *CEQA Guidelines* states: “The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as

infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts."

To determine what range of alternatives should be considered, the impacts identified for the proposed project were considered along with the project objectives. The proposed project is described in detail in Section 3, Project Description, and the potential environmental effects of the proposed project are analyzed in Sections 4.1 through 4.11.

5.3 PROJECT OBJECTIVES

To develop project alternatives, the EIR preparers considered the project objectives and reviewed the significant impacts in Section 4 to identify those significant impacts that could be avoided or reduced substantially through an alternative.

The project's objectives are to:

- Preserve a land that is sacred with deep spiritual significance;
- Preserve a land that reflects California's long and storied heritage;
- Create an outdoor destination in the region for all ages and cultures;
- Create a recreation resource to inspire;
- Restore and preserve a thriving, ecologically rich landscape;
- Create a place for innovative and interactive education and experiences;
- Preserve a landscape to experience and learn about its natural and cultural history; and
- Create a space to find peace and respite.

5.4 ALTERNATIVES CONSIDERED

The following discussion is provided to meet the requirement of the *CEQA Guidelines* and provide the public and decision makers with information that will help them understand the significant impacts associated with the alternatives to the proposed project.

The project resulted in impacts to aesthetics, biological resources, and transportation that could be mitigated with the implementation of mitigation measures. Additionally, the project resulted in significant and unavoidable impacts to noise and transportation. Significant unavoidable impacts to noise would be created by the increase in traffic on Cannon Lane, which prior to the project is a lightly-traveled country road. Limiting access to the Park to reduce this impact would fail to meet the project objectives of creating a new park and recreation resource. Therefore, this impact cannot be mitigated or avoided.

Significant unavoidable impacts to transportation would result from existing unacceptable delay at Lakeville Highway (SR 116)/Stage Gulch Road, which the project traffic would incrementally increase. There is no adopted plan or funding mechanism for improvements needed to reduce the delay at this intersection and this impact cannot be mitigated by this project or any other project in the County. Therefore, only a No Project/Interim Master Plan Alternative was evaluated:

- **Alternative A: No Project/Interim Master Plan:** The No Project/Interim Master Plan Alternative assumes that the County would not adopt and implement the Tolay Lake Regional Park Master Plan for the project area. Instead, Regional Parks would continue to manage Tolay Lake Regional Park based on the 2008 Interim Public Access and Resource Management Plan. The 2008 Interim Public Access and Resource Management Plan would allow access to the Park on a day-use permit basis, provide for operation and maintenance of existing facilities, and implement some resource enhancement and management. The 2008 Interim Public Access and Resource Management Plan contains measures required as either part of the Plan or as required in the IS/MND for the 2008 Interim Public Access and Resource Management Plan.

No new facilities would be constructed, lake restoration would not occur, there would be no overnight use, no new backcountry trails or facilities constructed, and there would be no rehabilitation and reuse of any of the Cardoza Ranch buildings. Public access (with the exception of school groups) would still be limited to Saturdays, and Sundays for individuals who hold access permits.

5.4.1 Alternatives Rejected as Being Infeasible

As described above, Section 15126.6(c) of the *CEQA Guidelines* requires an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination.

As stated above, limiting access to the Park to reduce significant unavoidable impacts would fail to meet the project objectives of creating a new park and recreation resource for County and regional residents. Additionally, Tolay Lake is an area rich in cultural resources and history that is important on a state and national level. Therefore, alternatives related to limiting access through some kind of permit system was rejected as infeasible.

Regarding choosing an alternate location, the project is a Master Plan for a Regional Park with unique characteristics. The Park has an intermittent perennial lake/wetland complex, which is not present in any other land owned or managed by Regional Parks. The project area provides important natural resource open space, and scenic values not found at other locations managed by Regional Parks. The Park is the only park that includes a working ranch. Due to these special features, there is not another location managed by Regional Parks that could serve the same purpose as the project area. Therefore, alternative sites were not analyzed.

5.5 ALTERNATIVES ANALYSIS

Following is a description of the alternative, its anticipated environmental impacts, and a comparison of those impacts to the proposed project. The discussion includes a determination as to whether the alternative would reduce, eliminate, or create new significant impacts.

5.5.1 Alternative A: No Project/Interim Master Plan

Under Alternative A: No Project/Interim Master Plan, the project area would remain as it currently exists and would not be opened for general public use without permits. No grading or construction would take place on the project area. Alternative A: No Project/Interim Master Plan

alternative would also not result in any changes to the site's drainage or soils on the site. There would be no construction impacts from the project.

5.5.1.1 Aesthetics

Under Alternative A, there would be no changes to the project site. The visual character of the Park would remain the same since there would be no new development of visitor-serving buildings, parking areas, new trails, or interpretive signage. Impacts to visual resources under Alternative A would be less than the less than significant impacts of the project to visual character and scenic vistas.

Under Alternative A there would be no installation of new nighttime lighting that could potentially create a new source of light and glare. The 2008 Interim Public Access and Resource Management Plan required mitigation measures for lighting, which would continue under Alternative A. Therefore, this impact would be the same as the impacts from light and glare under the project, which were mitigated to less than significant. Therefore, impacts on light and glare under Alternative A would be the same compared to the project. Impacts to visual character and scenic vistas would be incrementally less since the project area would remain unchanged.

5.5.1.2 Agricultural and Forestry Resources

Under Alternative A, grazing would continue on the project site. Additionally, the Williamson Act Contracts on the site would expire. These conditions would be the same as under the project. Although under Alternative A, there would be no General Plan Amendment changing the project site land use designation from Land Extensive Agriculture and Land Intensive Agriculture to Public-Quasi Public/Park; similar to the project, agricultural uses would not change. Therefore, impacts to agricultural and forestry resources would be the same under Alternative A as the project.

5.5.1.3 Air Quality/Greenhouse Gas Emissions

Under Alternative A, there would be no construction of new buildings or trails, paving of Cannon Lane, construction of a wastewater treatment plant, or other improvements requiring grading. The 2008 Interim Public Access and Resource Management Plan required mitigation measures for air quality impacts, which would continue under Alternative A. Therefore, this impact would be the same as the impacts from construction under the project, which incorporated the same measures into the project for construction air quality and were less than significant.

Under Alternative A, there would be no construction or increase in vehicle trips; therefore, no increase in air quality or greenhouse gas (GHG) emissions would occur from construction equipment and vehicles, visitor vehicle trips, grading, paving, or operation of Park facilities. Although there would be no significant impacts to air quality and GHG from the project, air quality and GHG emissions under Alternative A would be lower than under the project because there would be no increase in vehicle trips to and from the Park, construction emissions, and use of energy for Park operations. Therefore, impacts to air quality and GHG emissions under Alternative A would be incrementally lower than under the project.

5.5.1.4 Biological Resources

Under Alternative A, there would be no construction in the project area. Because no construction would occur, no ground disturbing activities, such as grading, fill, and/or excavation, would take place. Additionally, under Alternative A occasional tree removal would sometimes be required for maintenance under the Interim Plan. The 2008 Interim Public Access and Resource Management Plan IS/MND required mitigation measures for tree removal, which would continue under Alternative A. Therefore, this impact would be the same as the impact from tree removal under the project, which were mitigated to less than significant.

However, under Alternative A, the substantial habitat restoration proposed by the project would not occur. Ongoing habitat restoration on the Tolay Creek Ranch property would continue, but the more substantial habitat restoration projects associated with the project would not be undertaken. These more substantial habitat restoration activities include native grassland monitoring, riparian and woodland plantings, and wetland and meadow plantings. Specifically, under Alternative A, there would be no lake restoration—nor improvements to hydrology, that may improve hydrology on upstream neighbors, i.e., Tolay Lake causeway would not be lifted, there would be no installation of new culverts or removal of constrictions at the Farm Bridge. Additionally, drainage channels would not be graded back to 'natural' conditions benefitting numerous wildlife, waterfowl reptiles, mammals etc entire ecosystem

Therefore, under Alternative A, the significant benefits to biological resources from the project would not occur and this impact would be incrementally greater than under the project.

5.5.1.5 Cultural Resources

Under Alternative A, there would be no construction in the project area. Because no construction would occur, no ground disturbing activities, such as grading, fill, and/or excavation, would take place in the project area. There would be no potential to adversely affect archeological or paleontological resources, destroy a unique geologic feature, or disturb any human remains. The 2008 Interim Public Access and Resource Management Plan IS/MND required mitigation measures for impacts to cultural resources, which would continue under Alternative A. However, under Alternative A, the substantial cultural resource protection measures proposed by the project would not occur.

Under Alternative A, there would be no changes to the Park Complex buildings that could affect their historic designation. Again, the Interim Public Access and Resource Management Plan IS/MND required mitigation measures for impacts to historic resources, which would continue under Alternative A. This impact would be the same as the impact to historic and cultural resources under the project, which were mitigated to less than significant. Therefore, under Alternative A, the significant benefits to cultural and historic resources from the project would not occur and this impact would be incrementally greater than under the project.

5.5.1.6 Geology/Soils

Under Alternative A, there would be no construction in the Park. Because no construction would occur, no ground disturbing activities, such as grading, fill, and/or excavation, would take place. Therefore, soil erosion/loss of topsoil during construction and post-construction due to ground disturbances would not occur. The 2008 Interim Public Access and Resource Management Plan

IS/MND required mitigation measures for impacts to geology and soils, which would continue under Alternative A. However, none of the beneficial policies in the Trails Chapter and the Operations and Maintenance Chapter of the Master Plan related to erosion protection would be implemented.

Under Alternative A new buildings would not be constructed in the Park Complex. Therefore, under Alternative A there would be no potential for exposing people or structures to rupture of earthquake fault and seismic-related ground failure/shaking. These impacts would be incrementally less than the impacts under the project, which were less than significant. Similar to the project, Alternative A would have no impacts on potentially exposing people or structures to landslides. Therefore, overall, impacts under Alternative A would be less than impacts under the project since the project area would remain unchanged.

5.5.1.7 Hazards/Hazardous Materials

Under Alternative A, there would be no construction in the Park. Because there would be no construction under Alternative A, there would be no use, transport, or release/disposal of any potentially hazardous construction materials. The 2008 Interim Public Access and Resource Management Plan IS/MND required mitigation measures for impacts to hazards and hazardous materials, which would continue under Alternative A.

Comparable to the project, there would be no impacts on schools or hazardous sites or be located near a private or public airport. Under Alternative A, there would be no new construction or an increase in people on the site. Therefore, impacts to buildings or people from wildfire would be incrementally lower under Alternative A than the project.

5.5.1.8 Hydrology/Water Quality

Under Alternative A, there would be no construction and grading activities that would expose areas susceptible to erosion resulting in sedimentation in Tolay Lake or Tolay Creek. Additionally, there would be no increase in paved surfaces that would contribute additional stormwater runoff contaminants typical of urban landscapes. Under Alternative A, there would be no installation of a water well to extract groundwater. However, the project would not result in significant impacts from erosion, increase in paved surfaces, or reduction of water quality. These impacts would be the same under Alternative A.

Under Alternative A, no grading would occur, nor would there be placement of any fill in the Park, or construction of buildings in the FEMA-designated 100-year flood zone and impacts on the FEMA flood zone. Comparable to the project, Alternative A is not located downstream of any levees or dams, and is therefore not subject to flooding due to dam failure. Tsunami inundation maps indicate that the Park is not located in an area subject to inundation by tsunami.

There are no significant impacts on hydrology/water quality resulting from the project. However, under Alternative A, the various policies contained in the Master Plan that would protect water resources and water quality would not be implemented. Therefore, under Alternative A, the significant benefits to hydrology and water quality from the project would not occur and this impact would be incrementally greater than under the project.

5.5.1.9 Land Use and Planning

Under Alternative A, the Master Plan would not be adopted and implemented. Park access would not be improved and the Park would not be developed and would be able to accommodate increase use beyond current visitation levels. Sonoma County General Plan Goal PF-2.1 would not be met, which is to *Assure that park and recreation, public education, fire suppression and emergency medical, and solid waste services, and public utility sites are available to the meet future needs of Sonoma County residents.* Nor would General Plan Objective PF-2.1 be met, which is to *Provide an adequate supply and equitable geographic distribution of regional and local parks and recreation services based on population projections.* Therefore, Alternative A would not meet regional demand for recreation, which is a stated goal and objective of the Sonoma County General Plan (Goal and Objective PF-2.1).

Similar to the project, Alternative A would not physically divide an established community, nor would it conflict with any applicable habitat conservation plan or natural community conservation plan. Therefore, impacts on land use and planning under Alternative A would be slightly greater than under the project since Sonoma County General Plan goals, particularly related to recreation, would not be met.

5.5.1.10 Mineral Resources

Under Alternative A, rock material (gravel) would continue to be extracted from the quarry for onsite use related to road maintenance and other repairs within the property. Under Alternative A, similar to the project, there would be no change in the availability of a mineral resource. This impact would be the same as under the project.

5.5.1.11 Noise

Under Alternative A, there would be no noise or vibration generated by construction activities and there would be no construction related noise or vibration impacts. Therefore, although construction noise from the project is less than significant, this impact would be less under Alternative A. Similar to the project, Alternative A would not be located near a public or private airstrip.

Although the proposed project would not result in traffic noise that exceeds County standards, the resulting increase in traffic that could occur under the proposed project would nonetheless increase ambient noise levels, resulting in a significant unavoidable impact. Under Alternative A, there would be no increase in vehicle trips on Cannon Lane. Therefore, the permanent ambient noise level increase resulting from the project would not occur under Alternative A and there would be no significant unavoidable impact from noise. Overall, noise impacts under Alternative A would be less than under the project.

5.5.1.12 Public Services and Recreation

Under Alternative A, there would be no impacts to public services (fire protection, police protection, schools, parks, and other public facilities). Impacts to public services under Alternative A would be the same as under the project.

Under Alternative A, there would be no construction of new recreational facilities, thus, there would not be any adverse physical impacts on the environment associated with vehicle noise and

traffic. This would avoid the significant unavoidable impacts of the project to noise and transportation. Therefore, under Alternative A impacts on recreation would be less than under the project.

5.5.1.13 Transportation

Under Alternative A, vehicle trips would continue to be contribute to the Lakeville Highway (SR 116)/Stage Gulch Road intersection. This intersection is currently operating at a deficient LOS and this condition would continue under Alternative A. The project would contribute additional traffic to this intersection; therefore, impacts to this intersection would be incrementally greater under Alternative A. However, Alternative A would not avoid this impact. Therefore, while impacts on transportation and traffic under Alternative A would be less than under the project, they would not avoid the significant and unavoidable impact associated with reduction of LOS at Lakeville Highway (SR 116)/Stage Gulch Road.

Under Alternative A, no improvements would be required at the intersection of Lakeville Highway/Cannon Lane or along Cannon Lane. Additionally, Alternative A would not require the construction of a southern entrance to the Park. Therefore, there would be no need for mitigation at Lakeville Highway/Cannon Lane or along Cannon Lane and there would be no impact at the South Park Entrance on SR 121 that would require the installation of a left turn lane. These impacts would be less than under the project. Similar to the project, Alternative A would not cause changes in air traffic patterns, result in inadequate emergency access, or conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities.

5.5.1.14 Utilities

Under Alternative A there would be no construction of any park facilities, including overnight facilities, and consequently increase in water demand, generation of solid waste, or generation of wastewater from increased Park visitation. Alternative A would not require a new source of potable water or require construction of a new wastewater treatment facilities to serve the project area.

Therefore, although there are no significant impacts to utilities resulting from the project, overall, impacts on utilities under Alternative A would be less than under the project since the project site would remain unchanged.

5.5.1.15 Relationship of the Alternative to the Project Objectives

Alternative A would only meet three of the eight project objectives; those objectives pertaining to preservation. Alternative A would not create an outdoor destination in the region for all ages and cultures, would not restore and preserve a thriving, ecologically rich landscape, and would not expand the innovative and interactive education and experiences currently held at the Park. In addition, Alternative A would not address Goal and Objective PF-2.1, that pertain to meeting regional demands for outdoor recreation.

5.5.2 Environmentally Superior Alternative

As described in 5.1 and 5.2.1, Section 15126.6 of the *CEQA Guidelines* governs the consideration and discussion of alternatives to the proposed project. CEQA requires that an EIR

select the “environmentally superior” alternative and disclose the reasons for its selection as such.

Alternative A: No Project/Interim Plan Alternative would eliminate some of the significant impacts associated with the proposed project. Alternative A would eliminate the significant unavoidable impact related to a substantial, permanent increase in ambient noise levels because it would not increase weekday and weekend ambient noise levels by more than 5 dB.

However, under Alternative A, vehicle trips would continue to contribute to the Lakeville Highway (SR 116)/Stage Gulch Road intersection. This intersection is currently operating at a deficient LOS and this condition would continue under Alternative A and would not avoid the significant unavoidable impact.

Alternative A would not result in any ground-disturbing activities and new construction, which would lessen many of the project’s less than significant impacts. However, all of these impacts (with the exception of noise and traffic) were found to be less than significant.

Additionally, Alternative A would not result in the beneficial impacts of the project. Under Alternative A, the substantial habitat and lake restoration proposed by the project would not occur. Policies protecting biological and cultural resources would not be implemented. Additionally, policies protecting hydrology and water quality would not be implemented. Lastly, Alternative A would result in greater impacts to land use and recreation by not increasing recreational opportunities in Sonoma County. Therefore, under Alternative A, the significant benefits to biological resources, cultural resources, hydrology and water quality, land use, and recreation from the project would not occur and this impact would be greater than under the project.

Although Alternative A avoids most of the environmental impacts of the project, it increases other impacts. Alternative A would have similar (albeit different) impacts as compared to the project. Therefore, there are environmental advantages and disadvantages of the alternative in comparison with the project. Because the alternative would reduce some impacts and increase others, there is no clear environmentally superior alternative to the project.

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6. CEQA-REQUIRED CONCLUSIONS

Section 15126 and 15130 of the *CEQA Guidelines* requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the Draft EIR must also identify (1) significant environmental effects that cannot be avoided if the proposed project is implemented; (2) significant irreversible environmental change that would result from implementation of the proposed project; (3) growth-inducing impacts of the proposed project; and (4) cumulative impacts.

6.1 SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the *CEQA Guidelines* requires that an EIR describe any significant impacts which cannot be avoided, even with implementation of mitigation measures. Based on the analysis contained in this Draft EIR, with implementation of mitigation measures the project would result in significant unavoidable impacts to noise and traffic.

6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the *CEQA Guidelines* states that significant irreversible environmental changes associated with a proposed project shall be discussed, including the following:

- Uses of nonrenewable resources during the initial and continued phases of the project that may be irreversible because a large commitment of such resources makes removal or nonuse thereafter unlikely;
- Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area), which generally commit future generations to similar uses; and
- Irreversible damage that could result from environmental accidents associated with the project.

The proposed project would require the long-term commitment of natural resources. Project construction would result in an irretrievable commitment of natural resources through the direct consumption of fossil fuels, primarily in the form of fuel to power construction equipment, to generate electricity needed for construction, and to transport people and materials to and from construction areas.

The project would also require commitment of other nonrenewable resources, including: lumber and other forest products for construction; sand and gravel for concrete and building materials; asphalt for surfacing roads and parking areas; petrochemical construction materials, such as solvents, engine coolant, and lubricants for construction machinery; steel, copper, lead and other metals for reinforced concrete and pipes.

With the exception of noise generated by increased traffic on Cannon Lane and an increase in traffic at the Lakeville Highway (SR 116)/Stage Gulch Road intersection, primary impacts of the project would be mitigated to less than significant. The project intends to retain the existing agricultural uses, which would ensure preservation of the existing agricultural uses on the site

and the agricultural environment in this part of the County, while expanding open space recreation opportunities to the public.

The project uses would be limited to outdoor recreational users visiting during the day (overnight activities would be confined to permit-only camping and bunkhouse facilities) and would not interfere with the existing agricultural activities. Some building construction is proposed in the Park Complex, an area currently developed with existing buildings. Other improvements include repairs and paving to Cannon Lane and the addition of the Southern Entrance to the Park. The project does not propose the development of land uses (such as residential or commercial development, new roadways, or infrastructure) that would permanently commit Prime Farmland or Farmland of Local Importance. Therefore, development of visitor-servicing uses, including improving access to the Park would not represent a large commitment of land to future uses or create secondary impacts.

Accidental spills of fuels, paints, or other chemicals could occur during construction. However, pursuant to California Health and Safety Code Sections 25500–25520, the construction contractor would be required to limit spills by training construction workers, supervising all construction work, and reporting and cleaning-up any inadvertent spills of chemicals used during construction (e.g., fuel, lubricants) with oversight from Sonoma County’s Certified Unified Program Agency program. In addition, the project does not propose nor would it require the use explosives or other extremely hazardous materials (e.g., pesticides, other toxins) during construction.

6.3 GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT

Section 15126.2(d) of the *CEQA Guidelines* requires a discussion of the ways in which a proposed action could be growth inducing. This includes ways in which the project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

In general, a project may foster spatial, economic, or population growth in a geographic area if it meets any one of the criteria identified below:

- The project removes an impediment to population growth (e.g., the establishment or expansion of an essential public service to an area)
- The project results in the urbanization of land in a remote location (leapfrog development)
- The project establishes a precedent-setting action (e.g., a change in zoning or General Plan amendment approval)
- Economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.)

If a project meets any one of these criteria, it may be considered growth inducing. Generally, growth-inducing projects are located in either isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure such as sewer and water facilities or roadways, that could encourage premature or unplanned growth.

The project would not remove an impediment to population growth as Cannon Lane is already existing, the Southern Entrance to the Park can be accessed by existing dirt roads, and the water supply and wastewater treatment plant are sized to serve the project uses only.

The project is a park located in a rural area and the outdoor recreational uses, would primarily consist of passive recreational uses such as hiking, horseback riding, mountain biking, and camping. These uses would not be considered urban uses and would not create urban uses that could cause leapfrog development.

The project includes a General Plan Amendment to change the land use designations from Land Extensive Agriculture to Quasi-Public land use, the specific use of the project area would be for public access and protection of sensitive natural and cultural resources. No residential or commercial land uses would be allowed under the new land use designation. This change in land use designation is specific to the Park properties, would not change land use designations to any of the adjacent properties. and would not be precedent setting.

Development of the parcels comprising the Park would not construct housing, directly add residents to the County, or make available new areas of undeveloped land for development. The construction of a new wastewater plant would be specific to and only support use of the Park. Improving Cannon Lane would occur to specifically support increased use of the Park. Finally, development of the Park would not result in a change in the local revenue base or increase employment. Therefore, the project would not induce future growth within Sonoma County.

6.4 CUMULATIVE IMPACTS

Section 15130 of the CEQA Guidelines requires a discussion of cumulative impacts of the project. The analysis must include a discussion of the project's possible environmental effects that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

6.4.1 Methodology

When evaluating cumulative impacts, CEQA envisions the use of either a list of past, present, and probable future projects, including projects outside the control of the lead agency, or a summary of projections in an adopted planning document (such as a General Plan and General Plan EIR), or some reasonable combination of the two approaches.

The proposed project includes development of a new open space Regional Park facility to serve the residents of Sonoma County. Given the scope and type of project, the most reasonable approach for the cumulative analysis would be to use the development assumptions in the Sonoma County General Plan 2020 (General Plan) and the environmental analysis of the impacts of the General Plan (General Plan EIR).

6.4.1.1 Aesthetics

The area considered for cumulative aesthetic impacts includes southern Sonoma County. The project would not result in any impacts to visual character of the site or scenic vistas. The project would create an impact from site lighting that was mitigated to less than significant. However,

the General Plan EIR found cumulatively significant impacts related to aesthetics from light pollution. Although the project impact was mitigated to less than significant, it would contribute incrementally to this cumulative impact.

6.4.1.2 Agriculture and Forestry Resources

The area considered for cumulative agricultural and forestry resource impacts includes Sonoma County. The project intends to retain the existing agricultural uses, including grazing, which would ensure preservation of the existing agricultural uses on the site and the agricultural environment in this part of the County. The project does not propose the development of land uses (such as residential or commercial development, new roadways, or infrastructure) that would permanently commit Prime Farmland or Farmland of Local Importance. The General Plan EIR did not find cumulatively significant impacts related to agricultural and forestry resources and the project would not create any cumulative impacts.

6.4.1.3 Air Quality and Greenhouse Gases

The area considered for cumulative air quality/GHG impacts is the San Francisco Bay Area Air Basin. A detailed analysis of the project's air quality and greenhouse gas impacts for the cumulative scenario are described in Sections 4.1.1 and 4.1.3 of the DEIR.

In summary, the project would not create any significant impacts to air quality. However, the General Plan EIR found cumulatively significant impacts related to air quality from ozone precursors. The project would generate vehicles trips and although project impacts to air quality were mitigated to less than significant, the project would contribute incrementally to this General Plan EIR cumulative impact.

6.4.1.4 Biological Resources

The area considered for cumulative biological resource impacts includes Sonoma County. The project would result in an impact from tree removal, which could conflict with local policies, and would be mitigated to less than significant. The General Plan EIR found cumulatively significant impacts related to special status species, sensitive natural communities, and wildlife habitat and movement. The General Plan EIR did not find any impacts related to tree removal.

The project proposes substantial habitat restoration activities including lake restoration, native grassland monitoring, riparian and woodland plantings, and wetland and meadow plantings resulting in a significant benefit to the status species, sensitive natural communities, and wildlife habitat and movement. Due to the size of the project, this benefit would extend to Sonoma County as a whole. Although the General Plan EIR found cumulatively significant impacts to status species, sensitive natural communities, and wildlife habitat and movement, the project would not contribute to any cumulative biological resource impacts.

6.4.1.5 Cultural Resources

The area considered for cultural resources cumulative impacts includes Sonoma County. As with any project that results in construction, the project would result in impacts to historic resources, archeological or paleontological resources, and unknown human remains. These impacts would

be largely avoided by the policies included in the Master Plan and any remaining potential impacts would be mitigated to less than significant by mitigation measures included in the DEIR.

The General Plan EIR found cumulatively significant impacts related to archaeological and paleontological resources. The project would preserve the TVHD and address both the short and long-term effects that may threaten archaeological and tribal cultural resources. The Master Plan contains objectives and standards to ensure that no impacts occur on inadvertent discoveries of cultural resources, including buried human remains, which is consistent with CEQA provisions. Due to the size of the project, the benefits accrued from protecting these cultural resources would extend to Sonoma County as a whole. Although the General Plan EIR found cumulatively significant impacts to archaeological and paleontological resources, the project would not contribute to any cumulative historic or cultural resource impacts.

6.4.1.6 Geology and Soils

The area considered for geology and soils cumulative impacts includes the project site. As with any project requiring construction, seismic hazards would be adequately mitigated by existing law, regulations, and policies, including the California Buildings Code and the County's development review procedures. Development and use of Tolay Lake Regional Park has the potential to result in erosion, particularly due to the steepness of some of the trails and roads, as well as construction activities.

The General Plan EIR found cumulatively significant impacts related to seismic shaking, ground failure, landsliding, settlement, tsunami and seiches, and soil erosion. These impacts are typical of project proposing land development, including housing and infrastructure. The proposed project includes development of a new open space Regional Park facility to serve the residents of Sonoma County. Development would be minimal and impacts would be less than significant. Although the General Plan EIR found cumulatively significant impacts to geology and soils, the project would not contribute to any cumulative geology and soils impacts.

6.4.1.7 Hazards and Hazardous Materials

The area considered for hazards and hazardous materials cumulative impacts includes Sonoma County. The proposed project includes development of a new open space Regional Park facility to serve the residents of Sonoma County and would not result in the use or transport of hazardous materials. The Master Plan includes both emergency access and evacuation plans, including maintenance activities for those facilities and there would be no impact from hazards. The General Plan EIR did not find cumulatively significant impacts related to hazards and hazardous materials and the project would not contribute to any cumulative impacts.

6.4.1.8 Hydrology and Water Quality

The area considered for hydrology and water quality impacts includes Sonoma County, particularly Tolay Creek watershed, which is bounded on the northeast by the Sonoma Mountains and on the southwest by a low line of hills that separate it from the Petaluma Valley to the west and San Pablo Bay. Implementation of the Master Plan would provide for a proactive approach to comply with sensitive resource regulations and protecting water quality. This process would require the implementation of measures to protect water quality during

construction of new park facilities and Tolay Lake restoration elements and future road and trail construction and maintenance.

A key component of the project would be restoration of Tolay Lake, which is intended to improve groundwater attenuation and late season flows in Tolay Creek, thereby improving wildlife habitat in the vicinity of Tolay Lake and in Tolay Creek. Additionally, the project proposes to change existing drainage patterns in the vicinity of Tolay Lake, to remove and replace existing hydraulic structures, and to modify the causeway. The drainage changes and hydraulic structure improvements are intended and would be designed to improve hydraulics/flood conditions in the Park. The project would construct approximately 0.8 acres of new impervious surfaces, mostly in the form of new buildings. These new surfaces, however, would not prevent stormwater runoff flows from recharging the underlying groundwater basin (Petaluma Valley Basin), as drainage would be conveyed to locations where the runoff can infiltrate. In addition, the project would not be located within the Petaluma Valley Basin's primary recharge areas, which are concentrated northwest of Petaluma or scattered on the western flank of the Sonoma Mountains to the east. Therefore, there would be no significant impacts to hydrology and water quality from the project.

The General Plan EIR found cumulative hydrologic and water resources impacts, including increased demand on groundwater supplies, alteration of drainage patterns, and increased impervious surfaces. However, as described above, the project would result in significant benefits to hydrology and water quality and this benefit would extend to Sonoma County as a whole and would not contribute to any cumulative hydrologic and water quality impacts.

6.4.1.9 Land Use and Planning

The area considered for land use and planning cumulative impacts includes Sonoma County. The Master Plan consists of conceptual plans for physical improvements; a resource management plan, educational and interpretive plan, trails plan, and phasing and implementation plan; Park maintenance and operation activities; and Master Plan goals, objectives, and policies that would guide implementation of Park activities and provide resource protection measures and activities. The project would implement Sonoma County General Plan 2020 Open Space and Resource Conservation Goal OSRC-17, which aims to “establish a countywide park and trail system that meets future recreational needs of the County's residents while protecting agricultural uses.” Pursuant to Policy OSRC-17a, the County is requesting a General Plan Amendment to apply the “Public-Quasi Public/Park” land use designation to the Park site. This change in land use designation would allow for implementation of the Master Plan while maintaining the agricultural heritage of the Park, preserving open space and natural resource values, and achieving compatibility among adjacent land uses.

The General Plan EIR found that land use incompatibility resulting from residential/urban land uses in the rural agricultural areas would be a significant impact. The project is not a land use development plan, but the continuation of an existing land use, Tolay Lake Regional Park. The project intends to retain the existing agricultural uses, including grazing, which would ensure preservation of the existing agricultural uses on the site and the agricultural environment in this part of the County. The project does not propose the development of land uses (such as residential or commercial development, new roadways, or infrastructure) that would permanently commit Prime Farmland or Farmland of Local Importance. Development would be minimal and

impacts would be less than significant. Although the General Plan EIR found cumulatively significant impacts to land use and planning, the project would not contribute to any cumulative land use and planning impacts.

6.4.1.10 Mineral Resources

The area considered for mineral resource cumulative impacts includes Sonoma County and the state of California. The project site is designated as MRZ-3a and MRZ3b with respect to Portland concrete cement aggregate and asphalt concrete aggregate, and MRZ-3a, MRZ3b, and MRZ-4 with respect to class II base aggregate by the state of California. The project area is not designated by Sonoma County as an area containing mineral resources.

There is an existing quarry within the project area., but any gravel extracted is used only on-site and is not exported. The Sonoma County Agricultural Preservation and Open Space District's conservation easement for this project site allows for the continued extraction of rock material from this quarry, but prohibits any other exploration, development, and extraction of mineral resources within the project property. The General Plan EIR did not find cumulatively significant impacts related to mineral resources and the project would not contribute to any cumulative impacts.

6.4.1.11 Noise

The project area for noise cumulative impacts for traffic increase is the area surrounding the project site, including nearby roadways. A detailed analysis of the project's noise impacts for the cumulative scenario are described in Section 4.8 of the DEIR. In summary, the project operation would generate noise from off-site vehicle traffic on Cannon Lane. This impact would be significant and unavoidable.

The General Plan EIR found that noise impacts related to vehicle and rail travel would result in significant cumulative noise impacts. However, the project is located in a rural area of southern Sonoma County. The increase in noise would be limited to a very small number of residences along Cannon Lane and would occur only during hours of Park operation when traffic would be generated. Additionally, the proposed improvements to Cannon Lane would result in a paved, improved road surface of uniform width. Thus, the proposed improvements would improve traffic noise below that which would occur without the Master Plan, a factor that is not accounted for in the noise analysis, which presented a conservative estimate. Therefore, due to the remote location of the project, limited number of receptors exposed to this increase in noise, and the potential for improvements to decrease noise, the project's contribution to General Plan EIR noise impacts would not be cumulatively considerable.

6.4.1.12 Population and Housing

The area considered for population and housing cumulative impacts includes Sonoma County. The project is a Master Plan of conceptual plans for physical improvements; a resource management plan, educational and interpretive plan, trails plan, and phasing and implementation plan; Park maintenance and operation activities that would guide implementation of Park activities. Other than Park facilities, no housing is proposed.

The General Plan EIR found that growth, particularly in the cities, would result in significant cumulative population and housing impacts. Although the General Plan EIR found cumulatively significant impacts to population and housing, the project would not remove any housing, does not propose any housing, and would not contribute to any cumulative population and housing impacts.

6.4.1.13 Public Services and Recreation

The area considered for public services and recreation cumulative impacts includes Sonoma County. The General Plan EIR found that impacts to police and fire services and recreation would be cumulatively considerable. These impacts would be primarily due to increases in population created by land use development under the General Plan, which would increase demand for police and fire services and recreation facilities.

The project is a Master Plan of conceptual plans for physical improvements; a resource management plan, educational and interpretive plan, trails plan, and phasing and implementation plan; Park maintenance and operation activities that would guide implementation of Park activities. The project does not propose any housing that would increase population in the area. Police services at the Park are generally handled by Park personnel, who are peace officers. Fire protection would continue to be provided by the Lakeville Volunteer Fire Department and the Schell-Vista Fire Protection District. The Master Plan includes both emergency access and evacuation plans, including maintenance activities for those facilities. There would be no impacts to police and fire services from the project and the project would not contribute to any cumulative police and fire services impacts.

The significant impacts described in Section 4.9 under recreation, come from the project-related to increases in noise and traffic. However, the project itself would result in a net recreational benefit to the County by increasing the level and range of recreational resources available. Therefore, although the General Plan EIR found cumulatively significant impacts to public services and recreation, the project would increase park acreage in the County and would not contribute to any cumulative public services and recreation impacts.

6.4.1.14 Transportation

The area considered for transportation cumulative impacts includes Sonoma County. A detailed analysis of the project's traffic impacts for the cumulative scenario are described in Section 4.10 of the DEIR. In summary, the project operation would generate traffic, which in combination with existing intersection deficiencies would result in impacts at Lakeville Highway (SR 116)/Stage Gulch Road. Since there is no adopted plan or funding mechanism for improvements that would mitigate this impact, the impact of the project would be considered impact would be significant and unavoidable.

The General Plan EIR found that implementation of the General Plan would create cumulative transportation and traffic impacts, resulting from congestion on local County and city roadways, state highways, and key intersections. The project would contribute traffic on County roadways and would create a significant unavoidable impact at the intersection of Lakeville Highway (SR 116)/Stage Gulch Road. Therefore, the project would contribute to cumulative impacts from traffic.

6.4.1.15 Utilities and Service Systems

The area considered for public services and recreation cumulative impacts includes Sonoma County. The project would be supplied by water from an on-site well, which is capable of supplying the project needs. The Park would not be connected to a sanitary sewer system. Instead, Park wastewater needs, which are already served by portable toilets, would continue to be served by portable toilets until the proposed wastewater treatment facilities are constructed, approximately after year 10. With a wastewater treatment capacity of 13,350 gallons per day (gpd) average, or 19,462 gpd during a peak time, wastewater treatment for the Park would be sufficient to accommodate anticipated Park visitation and Park uses. The Park would generate solid waste, which would be disposed of at County facilities.

The General Plan EIR found that impacts to water supply, wastewater treatment, and solid waste would be cumulatively considerable. Although the General Plan EIR found cumulatively significant impacts to water supply and wastewater, the project would not require water supply or wastewater treatment from the same sources as land uses developed under the General Plan. Therefore, the project would be adequately supplied on-site and would not contribute to any cumulative water and wastewater impacts. The project would generate some solid waste from visitors to the site. While it could be conceivably argued that this solid waste would have been generated elsewhere in the County and was not a direct result of the project, solid waste generated by project construction would incrementally contribute to the County's waste flow. Therefore, the project would contribute incrementally to cumulative solid waste impacts.

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8. REFERENCES

SECTION 1.0 INTRODUCTION

No references for this section.

SECTION 2.0 EXECUTIVE SUMMARY

No references for this section.

SECTION 3.0 PROJECT DESCRIPTION

No references for this section.

SECTION 4.0 SETTING, IMPACTS, AND MITIGATION MEASURE

4.1 Impacts Found to be LTS

Air Quality and Greenhouse Gas Emissions

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