

April 2025



INITIAL STUDY/PROPOSED MITIGATED NEGATIVE DECLARATION

Russian River Parkway Project

PREPARED FOR:



Sonoma County
Regional Parks

Initial Study/Proposed Mitigated Negative Declaration
for the

Russian River Parkway Project

Prepared for:

Sonoma County Regional Parks
400 Aviation Boulevard, Suite 100
Santa Rosa, CA 95403
(707) 565-2041

Contact: Mark Cleveland

Prepared By:

Ascent Environmental, Inc.
2054 University Ave, Suite 400
Berkeley, California 94704
(510) 217-5000

Contact: Lily Bostrom

April 2025

PROPOSED MITIGATED NEGATIVE DECLARATION

PROJECT: RUSSIAN RIVER PARKWAY PROJECT

LEAD AGENCY: SONOMA COUNTY REGIONAL PARKS

Under the California Environmental Quality Act (CEQA), the lead agency is the public agency with primary responsibility for approval of the project. Sonoma County Regional Parks (Regional Parks) is the CEQA lead agency because it is responsible for implementation and operation of the Russian River Parkway Project.

PROJECT DESCRIPTION SUMMARY

The Russian River Parkway Project (project) is proposed by Regional Parks to create three new formal access areas to the Russian River with new public amenities between Cloverdale and the Sonoma County/Mendocino County line. The project would include the construction of trailheads and new and improved trails accessing the Russian River, as well as formal parking areas, picnic facilities, restrooms, garbage and recycling receptacles, interpretive features, a connector path along Geysers Road connecting the three new access areas, and invasive vegetation management.

The overall goal of the project is to create new formal public access to the Russian River north of Cloverdale along Geysers Road, where heavy recreational use has degraded the environment and caused community conflicts. By formalizing and managing the new river access, the project is anticipated to reduce trespassing, pollution, illegal dumping, and vandalism resulting from unregulated heavy use; and increase safety and accessibility by providing delineated parking and formalized trail access to the Russian River.

FINDINGS

An Initial Study (IS) has been prepared to assess the project's potential effects on the environment and the significance of those effects. Based on the IS, it has been determined that the project would not have any significant effects on the environment once mitigation measures are implemented. With the inclusion of revisions to the project directed by the mitigation measures, all potentially significant effects on the environment would be clearly reduced to a less-than-significant level. This conclusion is supported by the following findings:

1. The project would have no impact related to population and housing.
2. The project would have a less-than-significant impact on aesthetics, agriculture and forest resources, energy, greenhouse gas emissions, hazards and hazardous materials, land use and planning, mineral resources, noise, public services, recreation, utilities and service systems, and wildfire.
3. Mitigation is required to reduce potentially significant impacts related to air quality, biological resources, cultural resources, geology and soils, hydrology and water quality, transportation, and tribal cultural resources to less-than-significant levels.

Mitigation Measures

The IS identifies the following mitigation measures to reduce potentially significant environmental impacts.

Air Quality Mitigation Measures

Mitigation Measure AQ-1: Implement Construction Dust Reduction Measures

To reduce construction-related fugitive dust emissions, the construction contractor shall ensure that all construction activities comply with the following measures during all phases of project construction.

- ▶ All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- ▶ All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- ▶ All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- ▶ All vehicle speeds on unpaved roads shall be limited to 15 mph.
- ▶ All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- ▶ Any paving and/or concrete pads shall be completed as soon as possible after grading unless seeding or soil binders are used. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.
- ▶ All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- ▶ Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel.
- ▶ Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- ▶ All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- ▶ A publicly visible sign shall be posted with the telephone number and person to contact at Regional Parks regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Biological Resources Mitigation Measures

Mitigation Measure BIO-1: Avoid and Minimize Runoff from Trail Construction on the Bank of the Russian River

Regional Parks will limit ground-disturbing activities below the top of the bank of the Russian River to between April 1 and October 15, or within an operating season as otherwise required by the North Coast Regional Water Quality Control Board.

Within the operational season, in addition to the application of standard construction water quality best management practices (e.g., straw waddles and silt fencing), Regional Parks will suspend ground-disturbing activities below the top of the bank of the Russian River if: (1) it is raining, or (2) soils are saturated. Regional Parks will be prepared to completely suspend ground-disturbing activities below the top of the bank prior to the initiation of any rain event.

Activities that cause soil disturbance may resume below the top of the bank when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include: (1) areas of ponded water; (2) water carrying fine sediment out of the soil or disturbed areas, (3) loss of soil bearing strength resulting in the deflection of soil or trail surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) tire track imprints in the soil.

Mitigation Measure BIO-2a: Conduct Worker Environmental Awareness Training

Regional Parks will require environmental awareness training for all construction workers conducted by a qualified biologist or biological monitor prior to construction activities. Training will include identification of special-status species that may occur in the project site; procedures to follow if a special-status species is observed within the project site; and other environmental best management practices such as marking of sensitive habitats, hazardous material handling, spill response, and trash control.

Mitigation Measure BIO-2b: Avoid and Minimize Impacts to Special-Status Amphibians and Reptiles

Regional Parks will implement the following measures to reduce and avoid injury or death of special-status amphibians and reptiles and avoid the loss of western pond turtle nests.

- ▶ Pre-construction surveys for special-status amphibians and reptiles will be conducted by a qualified biologist within 48 hours before ground disturbance and vegetation clearing. The surveys will encompass all work areas within suitable habitat for special-status amphibians and reptiles as determined by the qualified biologist. If special-status amphibians and reptiles are discovered during the surveys, the occurrence will be noted and the animal will be allowed to leave the work area on its own; however, animals may be moved to suitable habitat for the species, outside of the construction area, by a qualified biologist with the appropriate permits, if it does not leave on its own.
- ▶ If any western pond turtle nests are located during pre-construction surveys, a 50-foot non-disturbance buffer around the nest will be delineated using construction fencing, and no work will occur within this buffer until the young leave the nest.
- ▶ A qualified biological monitor will be present during use of heavy equipment to stop work if individual special-status amphibians/reptiles are present within the work area and injury or death of the animal could occur. Work will stop and the animal will be allowed to leave the work area on its own; however, animals may be moved outside the project site by a qualified biologist with the appropriate permits, if it does not leave on its own.
- ▶ All trenches, holes, and other steep-walled excavations shall be covered or a wildlife escape ramp installed prior to the end of each working day. Prior to the start of work each day, a qualified biological monitor will survey all trenches and similar excavations will be inspected for entrapped wildlife. If wildlife is entrapped, the animal will be allowed to leave the work area on its own; however, animals may be moved to suitable habitat for the species, outside of the project construction site area, by a qualified biologist with the appropriate permits, if it does not leave on its own.
- ▶ The use of monofilament materials shall be prohibited within the project site during construction and operations.

Mitigation Measure BIO-3: Avoid and Minimize Impacts to Nesting Eagles

For construction during the nesting season (February 1 – August 31), Regional Parks will require that a survey for nesting eagles be conducted within 14 days of construction by a qualified biologist. The survey will encompass the area within 1 mile of the project site. If nesting bald eagles are identified during the survey, a 660-foot non-disturbance buffer will be implemented around the nest site, and if nesting golden eagles are identified a 1 mile non-disturbance buffer will be implemented. Within these buffers work will be postponed until the young have fledged or the nest is otherwise abandoned as determined by a qualified biologist. The nest buffer may be adjusted by the qualified biologist in consultation with the US Fish and Wildlife Service and California Department of Fish and Wildlife based on the type of activity, ambient noise and disturbance levels, topography, nest height, and screening vegetation as appropriate.

Mitigation Measure BIO-4: Avoid and Minimize Impacts to Special-Status Bat Roosts

To avoid and minimize impact to special-status bat roosts, Regional Parks will implement the following measures:

- ▶ Within 14-days prior to initiating work, a qualified bat biologist will inspect the project footprint and adjacent areas within 250 feet for bat roosts (most likely mature trees in the riparian woodland, pine woodland, and mixed oak woodland portions of the project site). Surveys will consist of a daytime pedestrian survey looking for evidence of bat use (e.g., guano) and/or an evening emergence survey to note the presence or absence of bats within potential roosts.

- ▶ If no bat roosts are found, then no further mitigation will be required. If evidence of bat use is observed, the number and species of bats using the roost will be determined. Acoustic bat detectors may be used to supplement survey efforts if needed to determine the species of roosting bats, but are not required.
- ▶ If an active maternity roost is detected, a qualified biologist shall determine an appropriate avoidance buffer to be maintained from March 1 until young are flying (typically through August). If an active maternity roost is detected in a tree or other vegetation planned for removal, or within a zone of influence (i.e., noise, vibration) that could result in roost abandonment, as determined by a qualified biologist, the bats shall be safely evicted under the guidance of a qualified biologist. Prior to eviction, Regional Parks will develop a Bat Roost Exclusion Plan. The plan will include measures for exclusion, restrictions on ambient temperature during exclusion, and a proposal to compensate for the removed roost (e.g., installation of bat houses). The Bat Roost Exclusion Plan will be submitted to CDFW for approval prior to implementation.
- ▶ If roosts of Townsend's big-eared bat or western red bat are determined to be present within the project site and within 250 feet of construction, work may be performed within the 250-foot buffer outside of the breeding season (March 1 through August 31) when the daytime temperature is 50 degrees Fahrenheit or greater.

Mitigation Measure BIO-5 Avoid Ringtail Maternity Dens:

To avoid and minimize impacts to ringtail, Regional Parks will implement the following measures.

- ▶ No more than 14-days prior to ground disturbance or vegetation clearing, a qualified biologist will conduct pre-construction surveys for active ringtail den sites within 0.25 mile of proposed project features, as access allows.
- ▶ If any active ringtail dens are located during surveys, a non-disturbance buffer will be placed around the den during the period of May 1 through June 30 to avoid disturbance of the den. The size of the non-disturbance buffer will be determined by a qualified biologist based on the activities occurring near the den, vegetative screening of the den, and other relevant information. No project activities will occur within the non-disturbance buffer during that period.

Mitigation Measure BIO-6: Avoid and Minimize Impacts to Common Nesting Birds

For construction and vegetation removal that occurs during the nesting bird season (February 1 – August 31), a nesting bird survey will be conducted within 14 days of the start of project activities. The survey will encompass the area within a 300-foot radius for raptors and 50-foot-radius for other birds. If nesting birds are identified, work within these buffer areas will be postponed until the young have fledged or the nest is otherwise abandoned. The buffer size may be altered by a qualified biologist. Factors to be considered for determining changes to buffer size will include presence of natural screening provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity (e.g., roads, recreation), and species sensitivity. Monitoring of the nest by a qualified biologist during and after construction activities shall be required if the activity has potential to adversely affect the nest. If construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the no-disturbance buffer shall be increased until the agitated behavior ceases.

Mitigation Measure BIO-7: Minimize Impacts to Sensitive Natural Communities

The following measures shall be implemented to avoid, minimize, or compensate for the potential loss of Torrey's melic grass grassland:

- ▶ A qualified biologist will map Torrey's melic grass grassland within the project site. If Torrey's melic grass grassland is not located within the disturbance footprint, the perimeter of the habitat will be flagged and avoided during project construction, and no further action regarding this habitat type is needed. If Torrey's melic grass grassland is located within the disturbance footprint of the project and would be permanently removed, compensatory mitigation will be required as described below.
- ▶ Regional Parks shall compensate for permanent loss of Torrey's melic grass grassland at a minimum of a 2:1 ratio through the development and implementation of a Compensatory Mitigation and Monitoring Plan for restoring in-kind habitat within the project site. The plan shall include the following:
 - identification of compensatory mitigation locations within the project site;

- reference sites for comparison with compensatory mitigation sites (using performance and success criteria) to document success;
- monitoring protocols, including schedule and annual report requirements (compensatory sites shall be monitored for a minimum of 5 years from completion of mitigation, or until the success criteria identified in the approved mitigation plan have been met);
- ecological performance standards, based on the best available science and including specifications for native plant densities, species composition, and survivorship; at a minimum, compensatory mitigation planting sites must achieve 80 percent survival of planted vegetation by the end of the 5-year maintenance and monitoring period or dead and dying vegetation shall be replaced and monitoring continued until 80 percent survivorship is achieved;
- corrective measures if performance standards are not met; and
- responsible parties for receiving and reviewing reports and for verifying success or prescribing implementation or corrective actions.

Cultural and Tribal Cultural Resources Mitigation Measures

Mitigation Measure CUL-1: Implement Measures to Protect Cultural and Tribal Cultural Resources

In the event that a precontact archeological site (including midden soil, chipped stone, bone, or shell), or historic period archaeological site (such as concentrated deposits of bottles, amethyst glass, or historic refuse) are found during project construction, all ground-disturbing activity within 50 feet of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. Regional Parks will be notified of the potential find and a qualified archeologist shall be retained to investigate its significance. If the find is a precontact archeological site, the culturally affiliated Native American tribe shall be immediately notified. The tribal representative(s), in consultation with the archaeologist, shall determine if the find is a significant tribal cultural resource (pursuant to Public Resources Code Section 21074). The tribal representative will make recommendations for treatment, as necessary. Culturally appropriate treatment may be preservation in place, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, or returning objects to a location within the project vicinity where they will not be subject to future impacts.

Any previously undiscovered resources found during construction will be recorded on appropriate California Department of Parks and Recreation 523 forms and evaluated for significance under all applicable regulatory criteria. If the archaeologist determines that the find does not meet the California Register of Historical Resources standards of significance for cultural resources, construction may proceed. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), the archaeologist shall work with the Regional Parks to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. If artifacts are recovered from significant historic archaeological resources, they shall be housed at a qualified curation facility. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, and analyzes and interprets the results.

If any human remains are exposed during construction, they shall be treated in accordance with the California Health and Safety Code and California Public Resources Code Sections 5097.94 and 5097.98, in consultation with the Native American Heritage Commission.

Geology and Soils Mitigation Measures

Mitigation Measure GEO-1: Implement Measures to Protect Paleontological Resources

In the event that a paleontological resource is uncovered during grading/excavation or other construction activities, all ground-disturbing activity within 50 feet of the discovery shall be halted immediately until a qualified paleontologist can assess the nature and significance of the find. No construction shall occur within 50 feet of the find until the qualified

paleontologist has determined and implemented the appropriate salvage and treatment of the find and confirms that construction may proceed.

Transportation Mitigation Measures

Mitigation Measure TRAN-1: Develop Traffic Control and Management Plan

A Traffic Control and Management Plan shall be prepared, and address all means to minimize temporary impacts from roadway and travel lane disruptions. The Traffic Control and Management Plan shall be submitted to and approved by the County of Sonoma prior to construction to minimize project impacts on local streets, highways, freeways, and other forms of transportation. The Traffic Control and Management Plan shall be developed in coordination with the County and at a minimum contain the following:

- ▶ describe the proposed work zone;
- ▶ delineate construction areas in a manner that protects vehicles, bicyclists, and pedestrians;
- ▶ provide for safe vehicular, pedestrian, and bicycle travel approaching and within the construction area;
- ▶ describe applicable detours and lane closures;
- ▶ describe appropriate tapers and lengths, signs, and spacing;
- ▶ identify appropriate channelization devices and spacing;
- ▶ identify work hours and workdays;
- ▶ identify proposed speed limit changes if applicable;
- ▶ describe any intersections that would be affected by the work;
- ▶ describe the trucks that would be used during construction, including the number and size of the trucks used per day, their expected arrival and departure times, their general weight and size, and circulation patterns;
- ▶ identify all staging areas;
- ▶ provide a description and/or documentation of the pavement conditions along the roadways used to access the site before the commencement of construction and at the conclusion of construction;
- ▶ coordinate with the County to determine how any potential pavement damage directly resulting from construction of the project would be mitigated;
- ▶ require that access to all surrounding parcels and properties be maintained at all times;
- ▶ require that adequate emergency vehicle access to all surrounding parcels and properties be maintained at all times; and
- ▶ where the project work area encroaches on a public right-of-way and reduces the existing pedestrian path of travel to less than 48 inches wide, alternate pedestrian routing shall be provided during construction activities.

Pursuant to Section 21082.1 of the California Environmental Quality Act, Sonoma County Regional Parks has independently reviewed and analyzed the IS and Mitigated Negative Declaration (MND) for the project and finds that the IS and MND reflect the independent judgment of Regional Parks. Regional Parks further finds that the project mitigation measures shall be implemented as stated in the MND.

I hereby approve this project:

Mark Cleveland

Mark Cleveland, Senior Park Planner
Sonoma County Regional Parks

(to be signed upon approval of the project after the public review period is complete)

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The appendices to this document do not meet County of Sonoma accessibility standards. The County of Sonoma is committed to improving access to County programs and services and to providing accommodation to individuals with disabilities as required under state and federal law, including the Americans with Disabilities Act. If you have a disability and the format of the appendices or any other material on our website interferes with your ability to access information on this site contact:

Sonoma County Regional Parks
Attention: Mark Cleveland, Senior Park Planner
Mark.Cleveland@sonoma-county.org
2300 County Center Drive, Suite A120
Santa Rosa, CA 95403
(707) 565-2041
CA Relay Service 711

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LIST OF ABBREVIATIONS

AB	Assembly Bill
ADA	Americans with Disabilities Act
BAAQMD	Bay Area Air Quality Management District
BGEPA	Bald and Golden Eagle Protection Act
BMP	best management practices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Department of Industrial Relations Division of Occupation Safety and Health
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CAP	criteria air pollutants
CARB	California Air Resources Board
CCA	Community Choice Aggregation
CCAA	California Clean Air Act
CCR	Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFGF	California Fish and Game Code
CH ₄	methane
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agencies
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibel
DEHS	Department of Environmental Health and Safety

DEM	Department of Emergency Management
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EO	Executive Order
EOP	Emergency Operations Plan
EPA	US Environmental Protection Agency
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
FSORAG	Forest Service Outdoor Recreation Accessibility Guidelines
FTA	Federal Transit Administration
GHG	greenhouse gas
GIS	geographic information system
GLO	General Land Office
H ₂ S	hydrogen sulfide
IS/Proposed MND	Initial Study/Proposed Mitigated Negative Declaration
ITE	Institute of Transportation Engineers
lbs/day	pounds per day
LEA	Local Enforcement Agency
L _{eq}	Equivalent Noise Level
L _{max}	Maximum Noise Level
LOS	level of service
LRA	Local Responsibility Area
LUST	leaking underground storage tank
MLD	most likely descendant
mph	miles per hour
MRZ	Mineral Resource Zone
MTCO ₂ e/year	metric tons of carbon dioxide equivalent per year
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCAB	North Coast Air Basin
NCUAQMD	North Coast Unified Air Quality Management District
NHTSA	National Highway Traffic Safety Administration

NO ₂	nitrogen dioxide
NoSoCo Air	Northern Sonoma County Air Pollution Control District
NO _x	Oxides of Nitrogen
NPDES	National Pollutant Discharge Elimination System
NWIC	Northwest Information Center
OHWM	ordinary high-water mark
OPR	Governor's Office of Planning and Research
PCE	primary constituent elements
PG&E	Pacific Gas & Electric
PM	particulate matter
PM ₁₀	Particulate matter 10 micrometers or less in diameter
PM _{2.5}	Fine particulate matter.
PRC	Public Resources Code
project	Russian River Parkway Project
RCPA	Regional Climate Protection Authority
RCRA	Resource Conservation and Recovery Act
Regional Parks	Sonoma County Regional Parks Department
ROG	Reactive Organic Gases
RPS	Renewable Portfolio Standard
RRD	Resources and Rural Development
RV	Recreational Vehicle
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCP	Sonoma Clean Power program
SCPA	Sonoma Clean Power Authority
SCSO	Sonoma County Sheriff's Office
SCT	Sonoma County Transit
SCTA	Sonoma County Transportation Authority
SCWA	Sonoma County Water Agency
SCWMA	Sonoma County Waste Management Agency
SFBAAB	San Francisco Bay Area Air Basin's
SMART	Sonoma-Marin Area Rail Transit
SO ₂	sulfur dioxide
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants

TCR	Tribal Cultural Resources
tpy	tons per year
U.S. 101	US Highway 101
USACE	US Army Corps of Engineers
USGS	US Geological Survey
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
VdB	vibration decibels
VMT	vehicle miles traveled
VOC	volatile organic compound
WWTP	wastewater treatment plant

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1 INTRODUCTION

1.1 INTRODUCTION AND REGULATORY GUIDANCE

This Initial Study/Proposed Mitigated Negative Declaration (IS/Proposed MND) has been prepared by the Sonoma County Regional Parks Department (Regional Parks) to evaluate potential environmental effects resulting from the creation of three new formal access areas to the Russian River with new public amenities between Cloverdale and the Sonoma County/Mendocino County line. Chapter 2, "Project Description," presents detailed project information.

This document has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.). An IS prepared by a lead agency to determine if a project may have a significant effect on the environment (State CEQA Guidelines Section 15063[a]), and thus determine the appropriate environmental document. In accordance with State CEQA Guidelines Section 15070, a "public agency shall prepare...a proposed negative declaration or mitigated negative declaration...when: (a) The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant impact on the environment, or (b) The Initial Study identifies potentially significant effects but: (1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and (2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment."

In one of these circumstances, the lead agency prepares a written statement describing its reasons for concluding that the project would not have a significant effect on the environment and, therefore, does not require the preparation of an Environmental Impact Report (EIR). As described in the environmental checklist (Chapter 3 of this IS), either potentially significant environmental impacts would not occur or they would be mitigated by project changes to a point that is clearly less than significant, depending on the environmental topic. Therefore, an IS/Proposed MND is the appropriate document for compliance with the requirements of CEQA. This IS/Proposed MND conforms to the content requirements of State CEQA Guidelines Section 15071.

Under CEQA, the lead agency is the public agency with primary responsibility for approval of the project. Regional Parks is the CEQA lead agency because they are responsible for approving and implementing the project. The purpose of this document is to present to decision-makers and the public information about the environmental consequences of implementing the project. This disclosure document is being made available to the public for review and comment on the Regional Parks' website at:

<https://parks.sonomacounty.ca.gov/learn/planning-projects/project-directory/all-active-projects/russian-river-parkway>.

This IS/Proposed MND will be available for a 30-day public review period from August 9, 2024 to September 9, 2024.

Supporting documentation referenced in this document is available for review at:

Sonoma County Regional Parks Office
2300 County Center Drive, Suite 120A
Santa Rosa, CA 95403

Comments should be addressed to:

Mark Cleveland
Sonoma County Regional Parks Office
400 Aviation Boulevard, Suite 100
Santa Rosa, CA 95403
E-mail comments may be addressed to: Mark.Cleveland@sonoma-county.org

If you have questions regarding the IS/Proposed MND, please call Mark Cleveland at: (707) 565-2041. If you wish to send written comments (including via e-mail), they must be postmarked by September 9, 2024.

After comments are received from the public and reviewing agencies, Regional Parks shall consider the environmental evaluation in the IS along with comments received and, at the Regional Parks' discretion, responses to environmental points raised in comments, and may (1) adopt the MND and approve the project; (2) undertake additional environmental studies to support the conclusions of the MND; (3) determine an EIR must be prepared; or (4) abandon the project. If the project is approved and funded, Regional Parks may proceed with the project after obtaining all necessary permits and approvals.

1.2 SUMMARY OF FINDINGS

Chapter 3 of this document contains the analysis and discussion of potential environmental impacts of the project.

Based on the issues evaluated in that chapter, it was determined that the project would have either no impact or a less-than-significant impact related to most of the issue areas identified in the Environmental Checklist, included as Appendix G of the State CEQA Guidelines. These include the following topic areas:

- ▶ Aesthetics
- ▶ Agriculture and Forest Resources
- ▶ Energy
- ▶ Greenhouse Gas Emissions
- ▶ Hazards and Hazardous Materials
- ▶ Land Use and Planning
- ▶ Mineral Resources
- ▶ Noise
- ▶ Population and Housing
- ▶ Public Services
- ▶ Recreation
- ▶ Utilities and Service Systems
- ▶ Wildfire

Potentially significant impacts were identified for air quality, biological resources, cultural resources, geology and soils, hydrology and water quality, transportation, and tribal cultural resources; however, mitigation measures included in the IS/Proposed MND would clearly reduce all impacts to a less-than-significant level.

1.3 DOCUMENT ORGANIZATION

This IS/Proposed MND is organized as follows:

- ▶ **Chapter 1: Introduction.** This chapter provides an introduction to the environmental review process. It describes the purpose and organization of this document as well as presents a summary of findings.
- ▶ **Chapter 2: Project Description and Background.** This chapter identifies project objectives and provides a detailed description of the project.
- ▶ **Chapter 3: Environmental Checklist.** This chapter presents an analysis of the full range of environmental issues identified in the CEQA Environmental Checklist and determines if project actions would result in no impact, a less-than-significant impact, a less-than-significant impact with mitigation incorporated, or a potentially significant impact. If any impacts were determined to be potentially significant, an EIR would be required. For this project, however, none of the impacts were determined to be significant after implementation of mitigation measures.
- ▶ **Chapter 4: References.** This chapter lists the references used in preparation of this IS/Proposed MND.
- ▶ **Chapter 5: List of Preparers.** This chapter identifies report preparers.

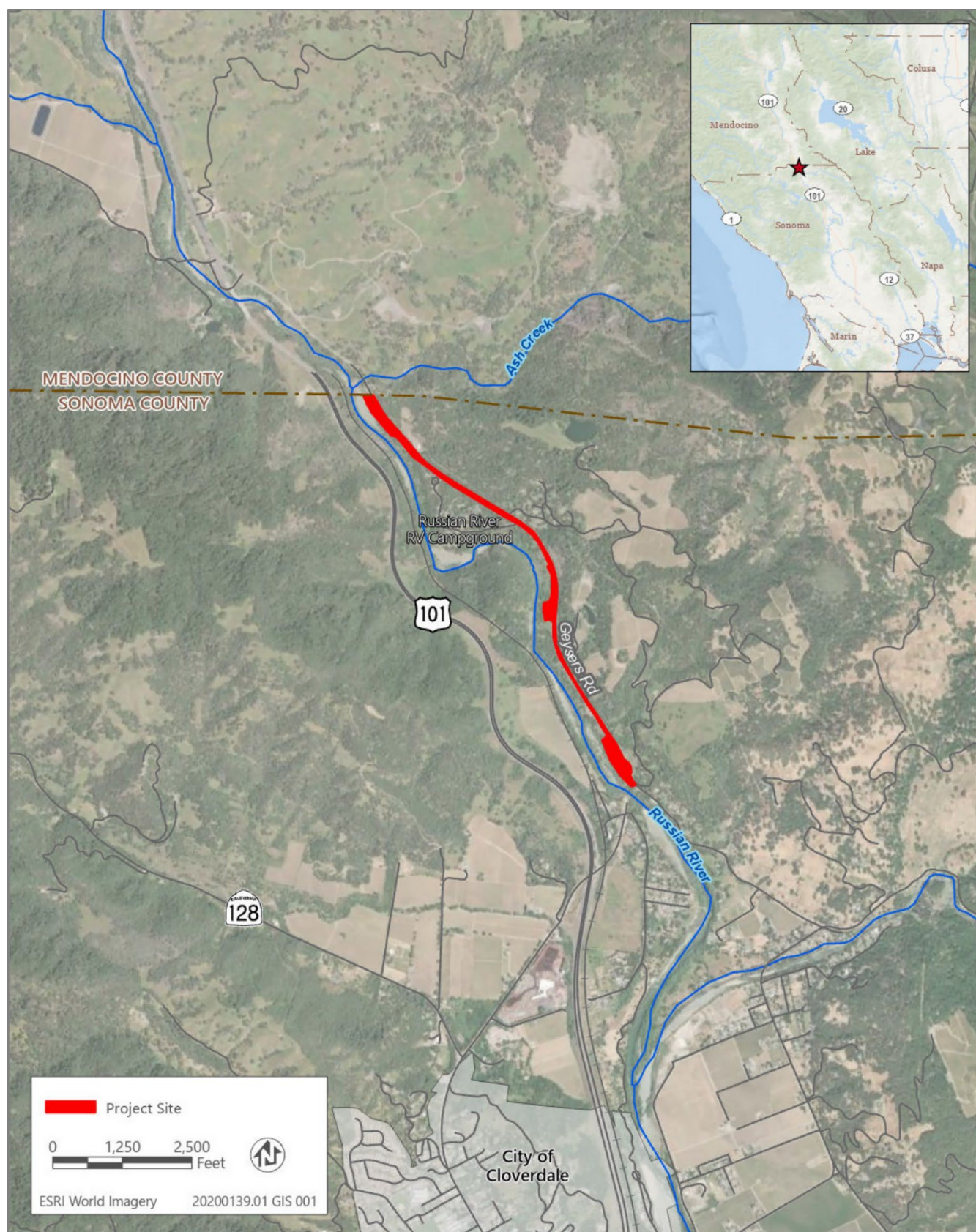
2 PROJECT DESCRIPTION

2.1 PROJECT INTRODUCTION AND OVERVIEW

The Russian River Parkway Project (project) is proposed by the Sonoma County Regional Parks Department (Regional Parks) to create three new formal access areas to the Russian River with new public amenities between Cloverdale and the Sonoma County/Mendocino County line (Figure 2-1). The project would include the construction of trailheads and new and improved trails accessing the Russian River, parking areas, picnic facilities, restrooms, garbage and recycling receptacles, interpretive features, a connector path along Geysers Road connecting the three new access areas, and invasive vegetation management.

The overall goal of the project is to create new formal public access to the Russian River north of Cloverdale along Geysers Road, where heavy recreational use has degraded the environment and caused community conflicts. By formalizing and managing the new river access, the project is anticipated to reduce trespassing, pollution, illegal dumping, and vandalism resulting from unregulated heavy use; increase safety and accessibility by providing delineated parking and formalized trail access to the Russian River; and reduce erosion from use of existing social trails by decommissioning and revegetating those trails. Regional Parks recognizes the Russian River Parkway has both local and regional significance as a tourist destination, especially during the summer months. People traveling the US 101 corridor in cars and recreational vehicles need resting points and attractions along the route to enhance the journey. The Russian River Parkway project would provide day-use parking for cars and trucks where safe along the entire project route, and for recreational vehicles up to 40 feet in length at the northern and southern access locations. All parking locations would be signed for “No Overnight Parking” and the main parking area in the southern Access Area 3 at Preston Bridge would be gated to restrict overnight vehicle access. The project includes the potential to provide overnight parking within the gated southern Access Area 3 once a camp host site is established and staffed. Overnight use would be short term and self-contained, meaning no water, sewer, or electrical connections would be provided. An overnight camping fee would be collected and County camping regulations, such as those pertaining to generator use and quiet hours, would be enforced by the camp host.

The County of Sonoma recognizes that this project is on the ancestral lands of the Cloverdale Pomo, who are the original caretakers of this area. The County respectfully acknowledges the Indigenous peoples who have been stewarding and maintaining relationship with this land as knowledge keepers for millennia. The County of Sonoma is dedicated to understanding and educating the public about historical and ongoing connections between land conservation and social inequities. This includes the histories of genocide, forced removal and displacement, and broken promises with Indigenous peoples as a part of American history. Indigenous people are not just in our histories. The County strives to optimize Indigenous voices to share their own history, as to not perpetuate another form of being silenced. While recognizing the past, the County honors the resiliency of Native people still in their ancestral territories in relationship with their land and culture. This acknowledgement does not take the place of authentic relationships with Indigenous communities, but serves as a gesture in respect to the land.



Source: Adapted by Ascent in 2023.

Figure 2-1 Project Vicinity

2.2 PROJECT LOCATION AND SETTING

The project would be located along Geysers Road in northern Sonoma County, approximately 1.5 miles north of the city of Cloverdale; east of US Highway 101 (US 101), the Northwestern Pacific Railroad, and the Russian River; and immediately south of the Sonoma County/Mendocino County line (Figure 2-1). The area is primarily undeveloped with forested rolling hillsides and agricultural lands in the immediate vicinity. Currently, legal recreation such as camping, hiking, and river use occur in the vicinity of the project, as well as illegal recreation and other prohibited activities (e.g., off-road vehicle use, illegal camping/encampments, dumping, vandalism).

The project site is approximately 25 acres and includes the three proposed access areas on the east bank of and adjacent to the Russian River, and a proposed connector path parallel to and along the west side of Geysers Road (Figure 2-2). The project site is bound by Geysers Road on the east and the Russian River on the west and extends approximately 1.75 miles south from the Sonoma County/Mendocino County line. The Russian River Recreational Vehicle (RV) Campground (with a mix of 125 RV, tent, cottage, and cabin sites) is located on the southwest side of Geysers Road and between the Russian River and the project site, and small areas of rural residences (i.e., Preston Heights) are located east of Geysers Road and adjacent to the project site. Ash Creek extends through the northern portion of the project site. Vegetative habitats in and around the project site are characterized as ruderal, non-native annual grassland, chaparral, riparian woodland, pine woodland, and mixed oak and bay woodlands. Areas of the project site have been damaged by previous unregulated use and the creation of informal trails, which has introduced ruderal (weedy) and invasive species to otherwise intact native habitat.

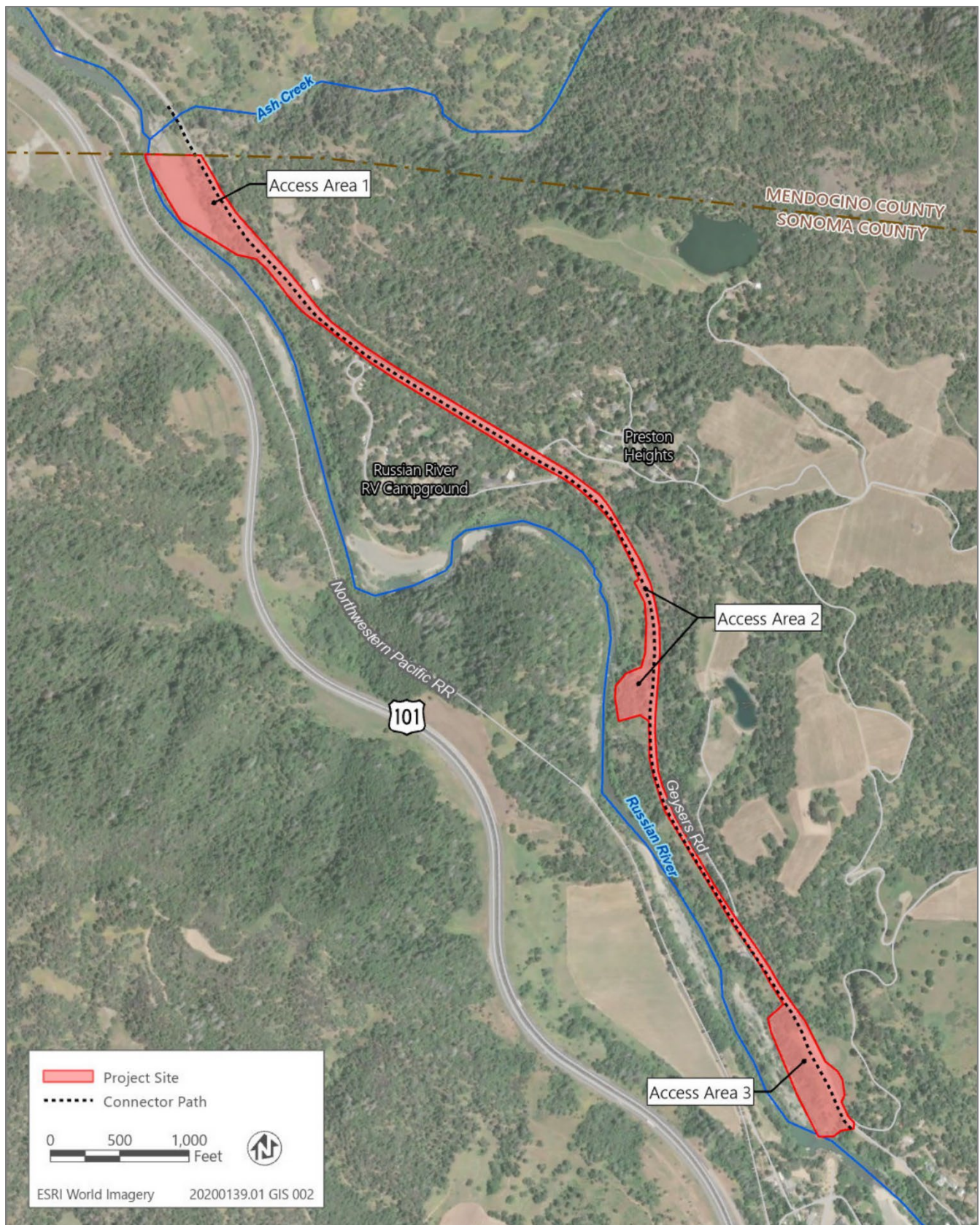
2.3 DESCRIPTION OF THE PROJECT

The project would develop three new, formal river access areas and associated public amenities along Geysers Road. All three access areas would be connected by an approximately 1.75-mile-long connector path along the existing west shoulder of Geysers Road. In addition, isolated stands of the invasive giant reed (*Arundo donax*) within the project site would be removed. Each of the proposed access areas, associated public amenities, the connector path, and proposed invasive vegetation removal are described in more detail below.

2.3.1 Access Area 1

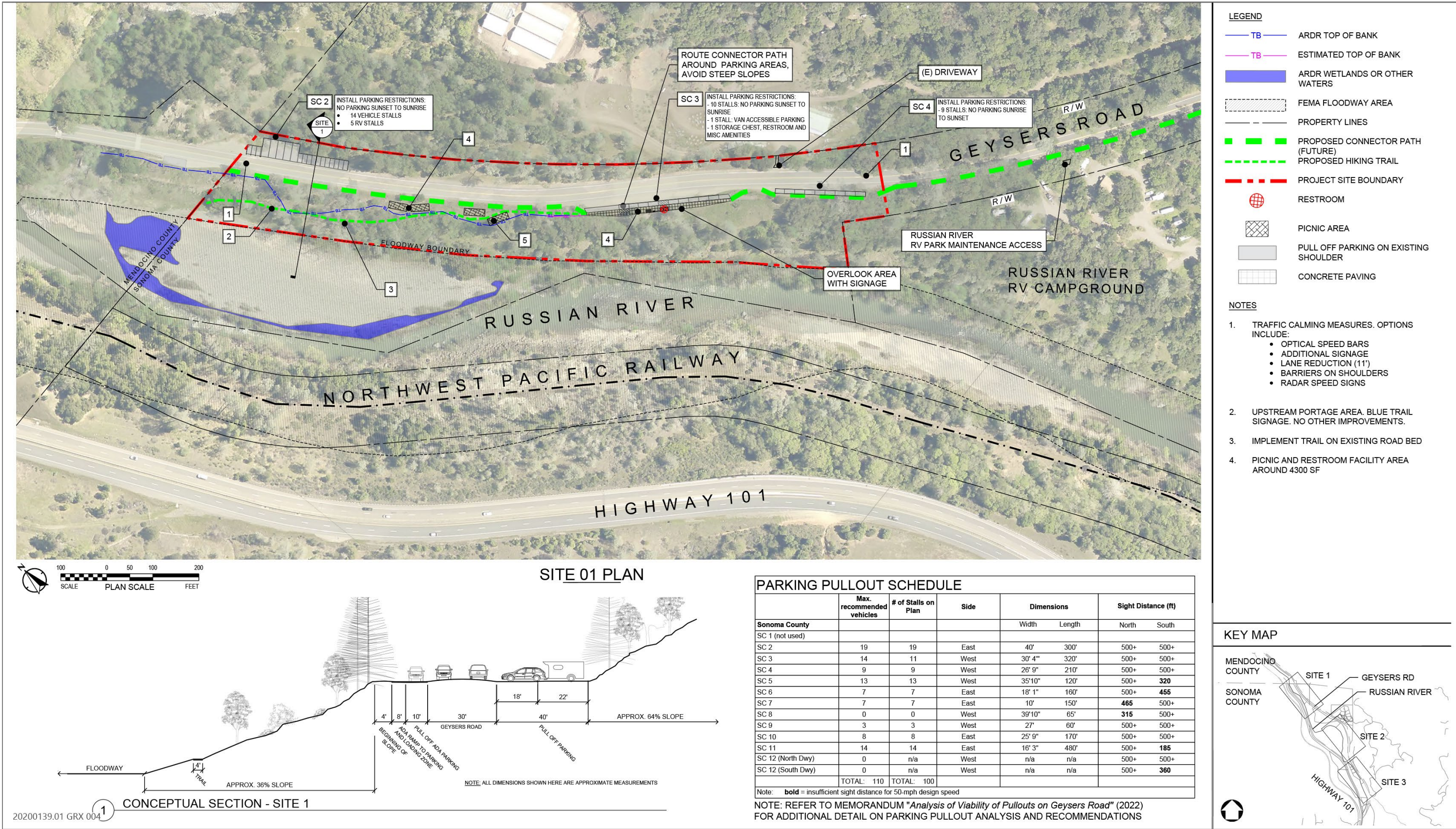
Access Area 1 is the northernmost proposed access area and extends from the Sonoma County/Mendocino County line and Ash Creek to immediately north of the Russian River RV Campground (see Figure 2-3). Access Area 1 would include two small, gravel base parking areas along the west side of Geysers Road and one gravel base parking area along the east side of Geysers Road where vehicle pullouts currently exist. The parking area along the east side would accommodate up to 14 vehicles with no parking from sunset to sunrise. There would be an additional five parking spaces for recreational vehicles (RVs). The parking areas along the west side of Geysers Road would accommodate a total of 19 vehicles with one additional van accessible stall. New signage would be installed conveying parking restrictions (i.e., no parking from sunset to sunrise).

The middle parking area on the west side of Geysers Road would include one vault toilet. The vault toilet would be constructed on a concrete platform and the vault toilet basin would extend up to 8 feet below ground surface. Access Area 1 would also include a picnic area with multiple picnic tables near the middle parking area on the west side of Geysers Road. The picnic and restroom facility area would be approximately 4,200 square feet. An overlook area with signage would also be placed along the west side of the middle parking area.



Source: Adapted by Ascent in 2023.

Figure 2-2 Project Site



Source: Provided by Alta Planning + Design and Adapted by Ascent in 2024.

Figure 2-3 Site Plan for Access Area 1

A 4-foot-wide natural surface trail, designed consistent with the Forest Service Trail Accessibility Guidelines (FSTAG), would be formalized on a previously disturbed, informal trail alignment/roadbed providing access to the river from the picnic area; only minor upgrades would be required, including erosion repair, minor vegetation removal, and drainage upgrades.

Other new amenities would include garbage and recycling receptacles. Traffic calming features would be implemented along Geysers Road as vehicles enter Access Area 1 from the north and south and could include any of the following: optical speed bars, additional signage, radar speed signs, barriers on roadway shoulders, and/or a reduction in roadway lane widths. Refer to Figure 2-3 for the locations of the new amenities associated with Access Area 1.

2.3.2 Access Area 2

Access Area 2, located approximately midway between Access Area 1 and Access Area 3, would include two small gravel base parking areas on the east side of Geysers Road within existing pullouts, accommodating up to seven vehicles each (14 total), and two small gravel base parking areas within existing vehicle pullouts on the west side of Geysers Road that would accommodate up to 16 vehicles. A portion of one of the pullouts on the east side of Geysers Road would prohibit public parking/access due to inadequate sight lines (i.e., the length of roadway visible to a driver). All parking in Access Area 2 would be prohibited from sunset to sunrise. An additional parking area on the west side of Geysers Road would be reserved for service and emergency vehicles only due to inadequate sight lines. New signage would be installed conveying parking restrictions (i.e., no parking from sunset to sunrise, no visitor parking in the service/emergency vehicle parking area).

A small picnic area would be established near the center of Access Area 2 on the west side of Geysers Road and one vault toilet would be provided. The vault toilet would be constructed on a concrete platform and the vault toilet basin would extend up to 8 feet below ground surface. Informal trails accessing the river currently exist in this area and would be formalized and repaired through minor grading to reduce ongoing erosion and limited vegetation removal.

An overlook with views of the Russian River would also be established on the west side of Geysers Road with a viewing platform (approximately 500 square feet), north of the picnic area. Access Area 2 would be minimally developed; however, picnic benches and garbage and recycling receptacles would be provided. Refer to Figure 2-4 for an overview of the amenities proposed at Access Area 2.

2.3.3 Access Area 3

Access Area 3 would be the most developed of the three new access areas and would be located in the southernmost portion of the project site. It would include two parking areas on the east side of Geysers Road in existing pullouts; one would accommodate eight vehicles and the other would accommodate 20 vehicles. A portion of one of the pullouts on the east side of Geysers Road would prohibit public parking/access due to inadequate sight lines. Parking would be prohibited from sunset to sunrise.

One large parking area would be on the west side of Geysers Road and would include up to 20 day-use parking stalls, three paved ADA-accessible van parking stalls, 16 pull-off stalls outside of the gravel base parking area, four RV parking stalls, two seasonal site host parking stalls, and one loading zone. The site host area would include one aboveground electrical hook up that would tie into an existing nearby power line. Vehicular gates would be installed to provide one-way entry into and a one-way exit out of the parking area. New signage would be installed conveying parking restrictions in each parking area, including no overnight parking sunset to sunrise until such time as a camp host is provided (overnight parking would only be allowed in the gated parking area with a camp host present). Immediately west of this parking area would be a large picnic area with 12 picnic tables and two vault toilets on concrete platforms, with basins extending up to 8 feet below ground. Connecting paths would provide access from the parking area to the restrooms and picnic areas. This surface of this area is currently a combination of asphalt and gravel pavement. Proposed site improvements would include removal of degraded asphalt pavement outside (west) of the existing roadway and replacing it with gravel base. Additional improvements would include the regrading and repair of existing gravel base in the proposed parking area on the west side of Geysers Road, and relocating existing K-rail barriers.

One existing informal trail accessing the river from the north side of the large parking area on the west side of Geysers Road would be formalized and regraded/repared to reduce ongoing erosion. Some minor vegetation clearing may be required and timber treads may be installed. On the south side of the large parking lot on the west side of Geysers Road, existing social trails would be decommissioned and revegetated, and one new trail designed consistent with FSTAG for improved accessibility would be established to access the river, address degradation of the area, and avoid wetland features.

Additional improvements would include the removal of dumped soil and debris piles (i.e., the berm) between the roadway and existing vegetation on the west side of Geysers Road to restore natural topography and drainage. The soil would be used on-site for base material in picnic areas and leveling to restore natural topography throughout the project site. If the volume of the berm exceeds the volume needed for base material and leveling, some material may be hauled off-site for disposal. In addition, the gravel parking area on the west side of Geysers Road would be regraded to restore natural sheet flow toward the picnic areas west of the parking area. Existing stormwater catchment basins along Geysers Road would remain unchanged and continue to capture runoff from the road. Traffic calming features would be implemented along Geysers Road as vehicles enter Access Area 3 from the south and could include any of the following: optical speed bars, additional signage, radar speed signs, barriers on roadway shoulders, and/or a reduction in roadway lane widths. Refer to Figure 2-5 for an overview of the amenities proposed at Access Area 3.

2.3.4 Connector Path

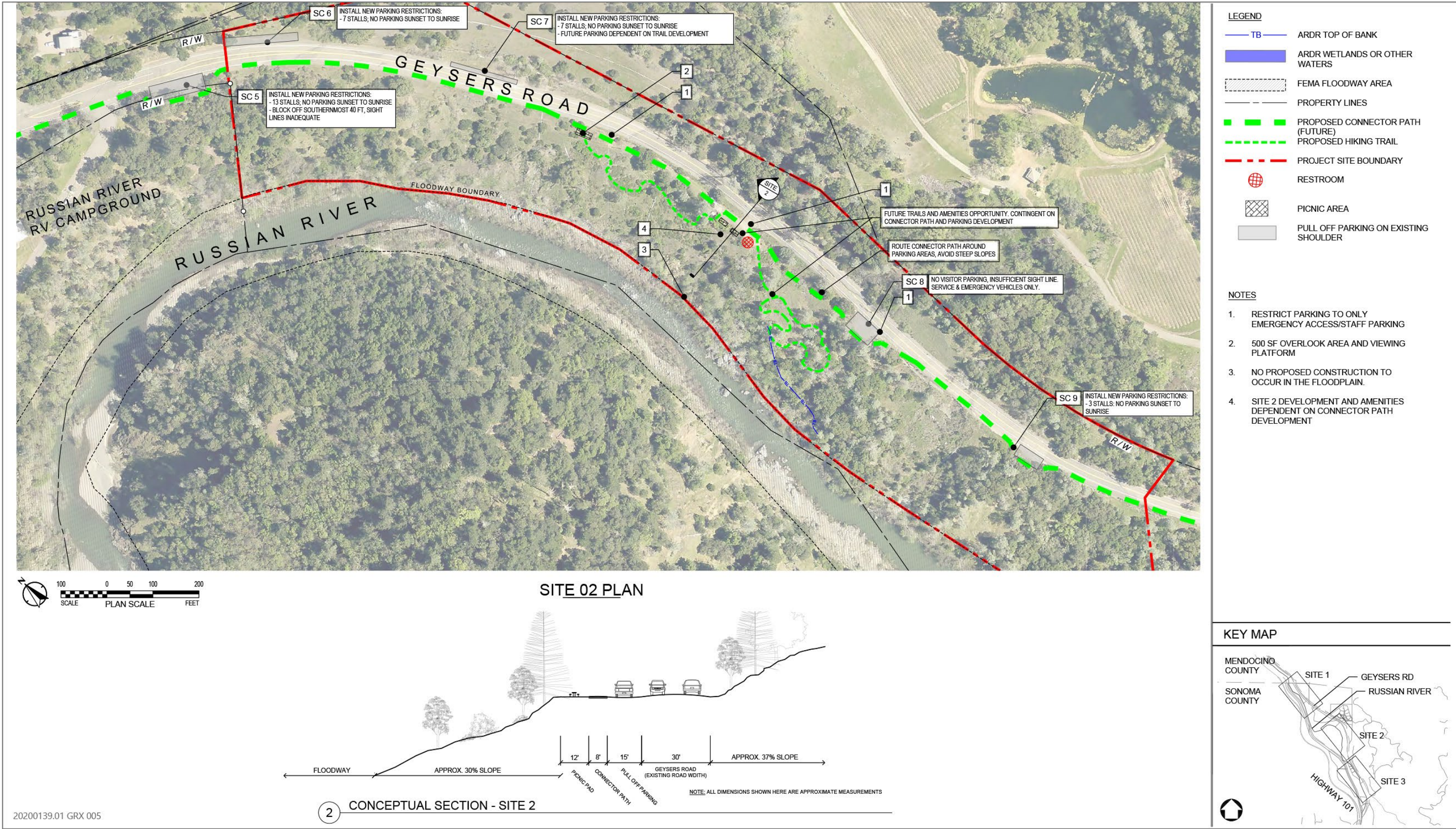
A new connector path would be established along the existing west shoulder of Geysers Road (refer to Figure 2-2). The path would utilize the space between the existing roadway edge and the top of slope, wherever feasible. It would extend 1.75-miles and would be 6 to 8 feet wide and connect all three of the new access areas described above. The connector path would be composed of compacted gravel and established by light grading/resurfacing and then laying gravel; it would meet FSTAG accessibility design standards at a minimum. Short trail segments may use the existing pavement shoulder in sections where the area between the roadway edge and the top of the slope is too narrow to accommodate the path. In these areas, traffic calming measures and signage would be used on Geysers Road. As a conservative estimate, it is assumed that up to 20 trees located along the connector path would be removed by chainsaw; however total tree removal would likely be much less. Trees would be planted to replace those removed according to local requirements.

2.3.5 Invasive Species Management

Small, isolated stands of the invasive giant reed exist in the north and south ends of the project site, adjacent to riparian woodlands near the river. The giant reeds would be removed using cutting and hand tools only. The cut vegetative material would be hauled off-site for disposal as green waste.

2.4 CONSTRUCTION ACCESS, EQUIPMENT, STAGING, AND LOGISTICS

Access Areas 1 and 3 would be constructed over 16 months, between 2025 and 2026. Access Area 2 and the connector path would be constructed after Access Area 1 and 3 at a future time when funding becomes available. For the purposes of the analysis in this Initial Study, it is conservatively assumed that the entire project would be constructed between 2025 and 2026. Therefore, impacts to environmental resources (e.g., biological resources, air quality, greenhouse gases, transportation) during construction would likely be less severe than described herein.



Source: Provided by Alta Planning + Design and Adapted by Ascent in 2024.

Figure 2-4 Site Plan for Access Area 2



Sonoma County Regional Parks
Russian River Parkway Project Initial Study

No work within the waters of the Russian River would occur, and all construction laydown, staging, and activity would occur outside of the Federal Emergency Management Agency (FEMA) floodplain associated with the Russian River, as shown on Figures 2-3 through 2-5. Construction would be limited to Mondays through Fridays, 7:00 a.m. to 5:00 p.m. and Saturdays, 9:00 a.m. to 4:00 p.m.; no work would occur on Sundays or holidays. Construction crews would consist of five to 10 personnel, and up to two crews would work simultaneously. The project site would be primarily accessed via US 101 and Geysers Road from the north, and construction staging and equipment laydown would occur in previously disturbed areas near each of the proposed access points (e.g., vehicle pullouts).

The overall construction sequence would include: mobilization of construction equipment and establishment of construction staging areas; installation of sediment and erosion control features (e.g., water diversion ditches, erosion control blankets, silt fencing or fiber rolls) throughout the project site consistent with the Stormwater Pollution Prevention Plan (SWPPP) that would be prepared for the project; clearing of vegetation and other debris in the locations of the proposed project features; rough grading to create a level base for the proposed parking areas, vault toilets, and picnic areas; rough grading to create an appropriate slope base for the proposed formal trails accessing the river from Geysers Road; excavation and foundation work to support the new vault toilets; finalization of grading and paving of the new parking areas; restoring and replanting disturbed areas; and demobilization.

Construction equipment and vehicles would be fueled and serviced off-site and would be inspected daily for leaks, damage, and other service problems, consistent with the requirements of the SWPPP. Any damaged or leaking equipment or vehicles would be promptly removed from the project site. The construction equipment anticipated to be required to implement the project includes the following:

- ▶ concrete/industrial saws,
- ▶ rubber-tired dozers,
- ▶ tractors/loaders/backhoes,
- ▶ cement and mortar mixers,
- ▶ pavers,
- ▶ rollers, and
- ▶ chainsaw.

The project would result in up to 2.25 acres of total ground disturbance; however, much of this would take place on previously disturbed areas and would involve minor regrading and/or placement of gravel base. New pavement/concrete would only be placed in the ADA-accessible parking and picnic areas and for the vault toilets, resulting in up to 8,000 square feet of new impervious surface. The typical grading/excavation depth would be approximately 1 to 2 feet for the new and proposed trail improvements, and 3 to 5 feet for retaining walls as necessary for the installation of the connector trail. The deepest excavation would be up to 8 feet for the vault toilets. All new structures and foundations would conform to the latest edition of the California Building Code. Up to 20 trees may be removed by the project using chainsaws; however total tree removal would likely be much less. Detailed design of the connector path would prioritize tree preservation. Following construction, disturbed areas and unstable slopes would be hydroseeded and trees would be planted to replace those removed according to local requirements.

2.5 ONGOING USE AND MANAGEMENT

Currently, operations and maintenance within the project site is limited and consists of complaint-based ranger patrols. A portable restroom is located on the southern end of the project site and is maintained by a private vendor. Russian Riverkeeper, a non-profit organization working to protect the Russian River, is assisting Regional Parks with cleanup of litter and encampments at the project site.

Following project completion, several new public facilities and amenities would require management and maintenance. Future operations and maintenance activities by Regional Parks would include continued spot and complaint-based patrols for parking and rules enforcement. In addition, on-site parking enforcement and traffic control would occur

during holidays that fall during potential peak use, such as during summer months (May – September). Garbage collection and cleaning of the proposed restrooms would occur on a weekly basis, and vegetation management (e.g., mowing and trail clearing) would occur twice annually. The vault toilets would be routinely serviced by a third-party contractor, which would pump and transport waste to a local treatment facility. Parking and recreational use of the project site would be prohibited daily between sunset and sunrise, except as provided by temporary overnight RV accommodations.

2.6 PERMITS AND APPROVALS

Table 2-1 below discloses the potential permits and approvals that may be required to implement the project.

Table 2-1 Potential Permits and Approvals

Permit/Approval	Agency	Purpose/Applicability
Section 1602 Notification of Lake or Streambed Alteration	CDFW	Notification may lead to an agreement which would minimize and mitigate impacts to stream bed and banks and riparian habitat. Applies to anticipated ground-disturbing activities within riparian vegetation within the top-of-bank of the Russian River.
Section 402 NPDES Construction General Permit	SWRCB	Construction activities that disturb 1 acre or more of land must comply with the NPDES Construction General Permit. Site owners must notify the state, prepare and implement a SWPPP, and monitor the effectiveness of the plan.
Tree Permit	County of Sonoma	The County requires a permit for the removal of County designated heritage or landmark trees. A tree permit would be required if the project would remove any trees with either of these designations.
Encroachment Permit and Design Review	Sonoma Public Infrastructure	Sonoma Public Infrastructure issues encroachment permits for work in County roadways. Development and construction of the connector path may require coordination and permitting from Sonoma Public Infrastructure. The project would also be subject to design review by County staff to ensure operational hazards related to transportation would be minimized and that the project would meet regulatory provisions regarding adequate sight distance at all access points.
Building Permit (includes Project Access Review, Septic Site Evaluation) and California Building Code Compliance	County of Sonoma	Building permits are required for the new restrooms. As a part of the Building Permit process, the Fire Prevention and Hazardous Materials Division of Permit Sonoma would review to confirm that for any type of emergency, the responding emergency services would be able to reach the project site quickly and safely under any conditions and have room to operate their equipment. In addition, Permit Sonoma requires projects involving new septic systems to undergo a septic site evaluation to determine if a Septic System Permit would be required. In this case, approval for the pump out style restrooms would be obtained through a Request for Waiver letter. California Building Code compliance review would occur for all new foundations and structures.

Notes: CDFW = California Department of Fish and Wildlife; NPDES= National Pollutant Discharge Elimination System; SWPPP = Stormwater Pollution Prevention Plan; SWRCB = State Water Resources Control Board.

Source: County of Sonoma and Ascent 2024.

3 ENVIRONMENTAL CHECKLIST

3.1 PROJECT INFORMATION

1. Project Title: Russian River Parkway Project
2. Lead Agency Name and Address: Sonoma County Regional Parks Department
400 Aviation Boulevard, Suite 100
Santa Rosa, CA 95403
3. Contact Person and Phone Number: Mark Cleveland
(707) 565-2041
4. Project Location: Geyser Road, unincorporated Sonoma County
5. Project Sponsor's Name and Address: N/A
6. General Plan Designation: Resources & Rural Development
7. Zoning: Resources & Rural Development
8. Description of Project: Refer to Chapter 2, "Project Description."
9. Surrounding Land Uses and Setting: Refer to Section 2.2, "Project Location and Setting."
10. Other public agencies whose approval is required: Refer to Table 2-1 in Chapter 2, "Project Description."
11. 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.?

In accordance with Assembly Bill (AB) 52, Sonoma County Regional Parks sent letters via certified mail to Native American tribal contacts in Sonoma County on July 2, 2020. Regional Parks sent letters to the following tribal contacts: Patricia Hermosillo, chairperson, Cloverdale Rancheria of Pomo Indians Tribal Band; Chris Wright, chairperson, Dry Creek Rancheria of Pomo Indians Tribal Band; Greg Sarris, chairperson, Federated Indians of Graton Rancheria Tribal Band; Merlene Sanchez, chairperson, Guidiville Indian Rancheria Tribal Band; Loren Smith, Tribal Historic Preservation Officer, Kashia Band of Pomo Indians of the Stewarts Point Rancheria Tribal Band; Dino Franklin, chairperson, Kashia Band of Pomo Indians of the Stewarts Point Rancheria Tribal Band; Marjorie Mejia, chairperson, Lytton Rancheria Tribal Band; Jose Simon, chairperson, Middletown Rancheria of Pomo Indians Tribal Band; and Scott Gabaldon, chairperson, Mishewal-Wappo Tribe of Alexander Valley Tribal Band. One response was received by the Cloverdale Rancheria of Pomo Indians Tribal Band and consultation was completed. Refer to Section 3.18, "Tribal Cultural Resources," for a summary of the consultation that occurred.

3.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|---|--|---|
| ☐ Aesthetics | ☐ Hazards / Hazardous Materials | ☐ Transportation |
| ☐ Agriculture and Forest Resources | ☐ Hydrology / Water Quality | ☐ Tribal Cultural Resources |
| ☐ Air Quality | ☐ Land Use / Planning | ☐ Utilities / Service Systems |
| ☐ Biological Resources | ☐ Mineral Resources | ☐ Wildfire |
| ☐ Cultural Resources | ☐ Noise | ☐ Mandatory Findings of Significance |
| ☐ Energy | ☐ Population / Housing | ☐ None |
| ☐ Geology / Soils | ☐ Public Services | ☒ None with Mitigation Incorporated |
| ☐ Greenhouse Gas Emissions | ☐ Recreation | |

3.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

- ☐ I find that the proposed project could not have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ 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.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that 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.

Mark Cleveland

Signature

April 2, 2025

Date

Mark Cleveland

Printed Name

Senior Park Planner

Title

Sonoma County Regional Parks

Agency

3.4 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063I(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

3.5 AESTHETICS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. Aesthetics.				
Except as provided in Public Resources Code Section 21099 (where aesthetic impacts shall not be considered significant for qualifying residential, mixed-use residential, and employment centers), would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

3.5.1 Environmental Setting

VISUAL CHARACTER AND QUALITY

The criteria for describing visual character and quality are vividness, intactness, and unity:

- ▶ **Vividness:** visual power or memorability of landscape components as they combine in striking or distinctive visual patterns.
- ▶ **Intactness:** visual integrity of the natural and human-built landscape and its freedom from encroaching elements. This factor can be present in well-kept urban and rural landscapes, as well as in natural settings.
- ▶ **Unity:** visual coherence and compositional harmony of the landscape considered as a whole.

The project site is located along the Russian River corridor in unincorporated Sonoma County. The project site is bound by Geysers Road on the east and the Russian River on the west, and extends approximately 1.75 miles south from the Sonoma County/Mendocino County line. Land uses in the vicinity of the project site primarily consist of rural residential properties; undeveloped lands to the north, east, and south; and agricultural properties. The Russian River RV Campground (with a mix of 125 RV, tent, cottage, and cabin sites) is located on the southwest side of Geysers Road and between the Russian River and the project site. Additionally, a small area of rural residences (i.e., Preston Heights) is located east of Geysers Road and adjacent to the project site. Ash Creek extends through the northern portion of the project site. Vegetative habitats in and around the project site are characterized as ruderal, non-native annual grassland, chaparral, riparian woodland, pine woodland, and mixed oak and bay woodlands.

Views of the project site are primarily available from Geysers Road and are dominated by dense trees and natural vegetation along both sides of the roadway. The mostly vegetative landscape exhibits a high degree of intactness, natural harmony, and visual coherence. Open, long-range views of the sky and rolling hillsides frame the background and add striking visual patterns and interest to the viewshed. Roadway infrastructure (e.g., paving, striping, signage, vehicle pullouts) and powerlines interrupt the primarily natural views and detract slightly from the intactness and unity of the area. However, given the low level of human disturbance, encroachments, and development within and surrounding the project site, the visual character and quality of the project site and vicinity are high.

VIEWER SENSITIVITY AND VIEWER EXPOSURE

Viewer sensitivity is a measure of public expectation or concern for changes to scenic quality. Number of viewers from publicly accessible viewpoints, viewer activity, view duration, distance from seen objects (i.e., foreground versus background), and special planning designations, such as zoning and general plan designations, are used to characterize viewer sensitivity. Given the dense vegetation within and surrounding the project site, viewers of the project site primarily include recreationists using the Russian River and motorists using Geysers Road.

Table 3.5-1 lists viewer groups that would be exposed to the project’s visual changes; defines their geographic proximity to the project; qualitatively estimates the volume of viewers, duration of views, and frequency of views; and identifies the viewer sensitivity of each general viewer group. Visual sensitivity associated with views in a particular area is the combination of viewer sensitivity and viewer exposure.

Table 3.5-1 Sensitive Viewer Groups with Views of the Project Site

Viewer Group	Viewer Exposure Area	Viewer Exposure Usage Volume	Viewer Exposure Duration of Views	Viewer Exposure Frequency of Views	Viewer Sensitivity
Recreationists	Project Site	Moderate	High	Low to Moderate	High
Motorists and vehicle passengers	Geysers Road	Low to Moderate	Low	Low to Moderate	Moderate

Source: Compiled by Ascent in 2022.

Recreationists who visit Russian River in this area do so in part for the natural setting and high scenic quality of the area and of the Russian River. These viewers likely spend some time in the area when recreating (i.e., moderate viewer exposure), and have high viewer sensitivity because the recreational activities they engage in are largely dependent on the scenic quality of the landscape. Motorists view the area from Geyser Road and experience clear views of the project site. Given that other major roadways are nearby, including the US 101, it is likely that many motorists traveling along Geysers Road are doing so to enjoy the scenery. Views by motorists would be temporary and short-term at typical vehicle speeds, and drivers would generally be focused on the road while driving (i.e., low viewer exposure). However, because motorists would likely travel on Geysers Road for the scenery, overall viewer sensitivity would be moderate.

SCENIC HIGHWAYS

A highway may be designated as “scenic” depending on how much of the natural landscape travelers can see, the scenic quality of the landscape, and the extent to which development intrudes on travelers’ enjoyment of the view. The California Department of Transportation (Caltrans) maintains a list of eligible highways and officially designated scenic highways in California. No officially designated state scenic highways are within the vicinity of the project site (Caltrans 2015, 2018). In addition, no locally designated scenic corridors are within the vicinity of the project site (Sonoma County 2020).

ZONING GOVERNING SCENIC RESOURCES

The project site is zoned Resources and Rural Development (RRD) by Sonoma County, which permits low intensity recreation. According to the Sonoma County zoning ordinance, low-intensity recreation is allowed in areas designated as RRD if the recreational opportunities support the study, appreciation, or enhancement of the natural environment (Sonoma County 2018a).

3.5.2 Discussion

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

No impact. A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. There are no publicly-accessible scenic vistas in the area with views of the project site. In addition, the dense vegetation within and surrounding the project site prevent long-range views of the project. Therefore, the project would have **no impact** on scenic vistas.

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

No impact. No designated state scenic highways or locally designated scenic corridors are within the vicinity of the project site (Caltrans 2018, Sonoma County 2018b). Therefore, the project would not damage any scenic resources within a state scenic highway, and there would be **no impact**.

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

Less than significant. Large equipment and materials would be present in the project site during construction and would temporarily reduce the vividness, unity, and intactness of the existing views of the project site by introducing encroaching human elements into the natural landscape. However, visual impacts from construction would be temporary and limited to the construction period. In addition, the project site is large, extending 1.75-miles and is 25 acres in size, large equipment and vehicles would move between the proposed project features and access areas during construction. Therefore, although visual character and quality would be degraded during construction, it would be temporary and only affect a relatively small portion of the project site at any given time.

The project includes several permanent features to support public use and recreation in the project site, including picnic areas, vault toilets, parking areas, a connector path, new signage, and several trail improvements. No new buildings or large structures are proposed by the project. These types of amenities are typical in public recreation areas and would be small relative to the overall size of the project site; they would not substantially reduce the vividness, intactness, or unity of the viewshed in the project site. In addition, Regional Parks sign standards are designed to create a cohesive and consistent image across the landscape so that signs do not overwhelm the natural beauty of the land or otherwise detract from trail users' experience. These standards would apply to any new signage on the project site. As described in Chapter 2, "Project Description," some existing trails would be decommissioned and up to 20 trees along Geysers Road may be removed by the project. However, the abandoned trail routes would be graded and re-seeded to blend into the landscape visually and ecologically and detailed design of the connector path would prioritize tree preservation. Following construction, disturbed areas and unstable slopes would be hydroseeded and trees would be planted to replace those removed according to local requirements. In the long-term, the proposed project features would formalize public access to the Russian River where existing recreational use has degraded the physical and visual environment through trail erosion, illegal dumping and pollution, and vandalism. By formalizing and managing new river access and associated amenities, the project is intended to reduce the negative consequences of unregulated heavy use, which would benefit the visual character and quality of the project

site. The project would also improve and enhance access to the area, giving the public more opportunities to enjoy the high-quality natural views of the project site and Russian River.

For the reasons described above, the project would have a **less-than-significant** impact on the quality of public views of the site and its surroundings.

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

Less than significant. Construction of the proposed project would be limited to the hours of 7:00 a.m. to 5:00 p.m. Monday through Friday and Saturdays 9:00 a.m. to 4:00 p.m.; no work would occur on Sundays or holidays. No construction would occur at night and the project would not affect nighttime views of the area. Construction equipment, materials, and vehicles could be reflective and create glare that could adversely affect daytime views of the project site. However, any glare created from construction equipment would be temporary and intermittent, and affected viewers would be limited mostly to motorists with moderate viewer sensitivity and low viewer exposure.

No new permanent lighting is proposed by the project. The season site host would use electricity while present on-site, which would include lighting within an RV; however, it would not be a substantial new source of light in the project site. Permanent project features include picnic tables, vault toilets, new signage, and other amenities constructed between three access areas. Architectural materials typical of picnic areas and vault toilets include wood, cement, and/or plastic and do not cause glare. As described above under criterion c), new signage would be designed consistent with Regional Parks' sign standards to be consistent with the landscape and not detract from the users' experience; therefore, it would not create excessive glare in the project site. For these reasons, the project would have a **less-than-significant** impact related to light and glare.

3.6 AGRICULTURE AND FOREST RESOURCES

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

3.6.1 Environmental Setting

FARMLAND

The project site is mapped as "Other Land" and "Urban and Built-Up Land" by the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) (DOC 2018). Other Land is considered land not included in any of the other mapping categories (i.e., farmland, grazing land, urban and built-up land, or water). Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; strip mines; borrow pits; as well as vacant and nonagricultural land surrounded by urban development that is greater than 40 acres. Urban and Built-up Land is used for residential, industrial, commercial, construction, institutional, public administrative purposes, railroad yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment plants, water control structures, and other development purposes. Highways, railroads, and other transportation facilities are mapped as a part of Urban and Built-up Land if they are a part of the surrounding urban areas (DOC 2020). No agricultural operations currently exist on the project site.

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, enables local governments to enter contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use (DOC n.d.). Although parcels immediately adjacent to the project site are under Williamson Act contracts, no parcels within the proposed project site are under a Williamson Act contract (Sonoma County 2018a).

The Sonoma County General Plan and Zoning Regulations (Section 26-10-010) designate the project site RRD. The RRD designation provides protection of lands needed for commercial timber production, geothermal production, aggregate resources production; and lands needed for protection of watershed, fish and wildlife habitat, biotic resources, and for agricultural production activities that are not subject to all of the policies contained in the agricultural resources element of the General Plan. The RRD district is also intended to allow very low-density residential development and recreational and visitor-serving uses where compatible with resource use and available public services (Sonoma County 2018b).

FOREST LAND AND TIMBERLAND

"Forest land" is defined in Public Resources Code (PRC) Section 12220(g) as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. The project site contains several native trees and dense vegetation that may be considered forest land under PRC Section 12220(g).

"Timberland" is defined in PRC Section 4526 as land, other than land owned by the federal government and land designated as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Regional Parks does not carry out timberland production activities on any of their managed lands, and no timberland production activities are located within the project site (Sonoma County 2018b).

3.6.2 Discussion

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?

No Impact. There is no Farmland present within the project site and no agricultural uses current exist. Therefore, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the FMMP, to non-agricultural use and there would be **no impact**.

b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

No Impact. The project site is not under a Williamson Act Contract; therefore, the project would not conflict with an existing Williamson Act (Sonoma County 2018a). The project site is zoned RRD, which provides for the protection of agricultural production activities and allows recreational and visitor-serving uses where compatible with resource use and available public services (Sonoma County 2018b). Because no agricultural uses currently exist within the project site and the proposed project would provide recreational and visitor-servicing uses, there would be no conflict with the existing zoning and **no impact** would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No impact. The project site is not currently zoned as forest land, timberland, or timberland zoned Timberland Production, and no timber harvesting occurs within the project site. As described under criterion b), the project site is zoned RRD, which provides for the protection of agricultural production activities and allows recreational and visitor-serving uses where compatible with resource use and available public services. No agricultural operations exist on the project site and the existing and proposed use as a recreational area is consistent with the existing zoning. Therefore, the proposed project would not conflict with zoning for forest land or timberland and **no impact** would occur.

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

Less than significant. The proposed project involves the development of new visitor serving amenities and would require limited quantities of vegetation removal, including the removal of up to 20 trees located along Geysers Road to accommodate the new connector path. However, detailed design of the connector path would prioritize tree preservation and following construction, disturbed areas and unstable slopes would be hydroseeded and trees would be planted to replace those removed according to local requirements. Because tree removal would not be extensive (i.e., up to 20 trees across the 25-acre project site) and removed trees would be replaced according to local requirements, the proposed project would not result in a substantial loss of forest land or conversion of forest land to non-forest use and the impact would be **less than significant**.

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

No impact. No other agricultural or forestry resources occur or are present within the project site. Impacts to Farmland and forest land are analyzed above in impact criteria a) through d). The project would not involve other changes to the existing environment that could affect other agricultural or forestry resources within the project site. Therefore, **no impact** would occur.

3.7 AIR QUALITY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. Air Quality.				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations.				
Are significance criteria established by the applicable air district available to rely on for significance determinations?	☐ Yes		☒ No	
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
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?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

3.7.1 Environmental Setting

The project site is located at the northern end of Sonoma County and lies within the North Coast Air Basin (NCAB). The NCAB is comprised of three air districts, the North Coast Unified Air Quality Management District (NCUAQMD), the Mendocino County Air Quality Management District, and the Northern Sonoma County Air Pollution Control District (NoSoCo Air). The project is within the portion of the NCAB that is in the jurisdiction of NoSoCo Air, which generally covers the northern and coastal regions of Sonoma County. The existing air quality conditions in the area are determined by natural factors such as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

CLIMATE AND TOPOGRAPHY

The NCAB is characterized by cool summers and mild winters with frequent fog and significant amounts of rain. In summer, warm ground surfaces draw cool air in from the coast, creating frequent thick fog along the coast and making northwesterly winds common. In winter, precipitation is high, surface wind directions are highly variable, and weather is more affected by oceanic storm patterns (NCUAQMD 1995: II-1 to II-3).

AMBIENT AIR QUALITY

Air Pollutants

As required by the federal Clean Air Act (CAA), the US Environmental Protection Agency (EPA) has identified National Ambient Air Quality Standards (NAAQS) for six criteria air pollutants (CAPs): ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), respirable and fine particulate matter (PM₁₀ and PM_{2.5}, which are particulate matter (PM) that is 10 microns or less in diameter and 2.5 microns or less in diameter, respectively), and lead. The state of California has also established California Ambient Air Quality Standards (CAAQS) for these six pollutants as well as sulfates, hydrogen sulfide (H₂S), vinyl chloride, and visibility reducing particles. NAAQS and CAAQS were established to protect the public from adverse health impacts caused by exposure to air pollution. A brief description of the CAPs and their effects on public health is provided in Table 3.7-1.

Table 3.7-1 Air Pollutants

Pollutant	Sources	Effects
Ozone	Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG), also sometimes referred to as volatile organic compounds (VOCs) by some regulating agencies) and nitrogen oxides (NO _x). The main sources of ROG and NO _x , often referred to as ozone precursors, are products of combustion processes (including motor vehicle engines) and the evaporation of solvents, paints, and fuels.	Ozone causes eye irritation, airway constriction, and shortness of breath and can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.
Carbon monoxide	CO is usually formed as the result of the incomplete combustion of fuels. The single largest source of CO is motor vehicle engines; the highest emissions occur during low travel speeds, stop-and-go driving, cold starts, and hard acceleration.	Exposure to high concentrations of CO reduces the oxygen-carrying capacity of the blood and can cause headaches, nausea, dizziness, and fatigue; impair central nervous system function; and induce angina (chest pain) in persons with serious heart disease. Very high levels of CO can be fatal.
Particulate matter	Some sources of PM, such as wood burning in fireplaces, demolition, and construction activities, are more local in nature, while others, such as vehicular traffic, have a more regional effect.	Scientific studies have suggested links between fine PM and numerous health problems, including asthma, bronchitis, and acute and chronic respiratory symptoms, such as shortness of breath and painful breathing. Recent studies have shown an association between Morbidity and mortality and daily concentrations of PM in the air.
Nitrogen dioxide	NO ₂ is a reddish-brown gas that is a by-product of combustion processes. Automobiles and industrial operations are the main sources of NO ₂ .	Aside from its contribution to ozone formation, NO ₂ can increase the risk of acute and chronic respiratory disease and reduce visibility.
Sulfur dioxide	SO ₂ is a combustion product of sulfur or sulfur-containing fuels such as coal and diesel. SO ₂ is also a precursor to the formation of PM, atmospheric sulfate, and atmospheric sulfuric acid formation that could precipitate downwind as acid rain.	Exposure can lead to the irritation of upper respiratory tract and heighten asthma symptoms.
Lead	Leaded gasoline, lead-based paint, smelters (metal refineries), and the manufacture of lead storage batteries have been the primary sources of lead released into the atmosphere, with lead levels in the air decreasing substantially since leaded gasoline was eliminated in the United States.	Lead has a range of adverse neurotoxic health effects.

Notes: CO = carbon monoxide; NO₂ = nitrogen dioxide; NO_x = oxides of nitrogen; PM = particulate matter; ROG = reactive organic gases; SO₂ = sulfur dioxide; VOCs = volatile organic compounds.

Sources: EPA 2018.

Attainment Area Designations

CCA and the California Clean Air Act (CCAA) require all areas of California to be classified as attainment, non-attainment, or unclassified as to their status with regard to the NAAQS and the CAAQS. Under the CAA and the CCAA, the California Air Resources Board (CARB) is to designate portions of the state based on air quality monitoring data.

The northern portion of Sonoma County, which the project is located in, is listed as “attainment” or “unclassified” for all the federal and state ambient air quality standards. Therefore, NoSoCo Air does not have an adopted air quality plan, although it occasionally exceeds state standards for PM₁₀ primarily as a result of wood-burning hearths.

Air Quality Planning

NoSoCo Air develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces measures through educational programs or fines when necessary. However, NoSoCo Air has not adopted standards of significance for construction or operation air quality pollutants and instead suggests the use of the Bay Area Air Quality Management District’s (BAAQMD) thresholds and mitigation measures. Therefore, NoSoCo Air relies on BAAQMD CEQA Air Quality Guidelines and significance thresholds to assess air quality emissions from land use development projects.

BAAQMD has adopted thresholds of significance to assist in the review of projects under CEQA, which are included in BAAQMD’s updated CEQA Guidelines (BAAQMD 2023). In developing thresholds of significance for air pollutants, BAAQMD considered the emission levels for which a project’s individual emissions would result in a cumulatively considerable contribution to the San Francisco Bay Area Air Basin’s (SFBAAB) existing nonattainment air quality conditions. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region’s existing air quality conditions. These thresholds aim to achieve and maintain the NAAQS and CAAQS for BAAQMD’s region, which are also intended to protect public health.

BAAQMD’s significance thresholds in the 2022 CEQA Air Quality Guidelines for project construction and operations are the most appropriate thresholds for use in determining air quality impacts of the proposed project. Table 3.7-2 presents the significance thresholds for construction and operational-related criteria air pollutants and precursor emissions, identified by NoSoCo Air and BAAQMD, and used for the purposes of this analysis.

Table 3.7-2 BAAQMD Air Quality Significance Thresholds

Pollutant	Construction Average Daily Emissions (lbs/day)	Operational Average Daily Emissions (lbs/day)	Operational Maximum Annual Emissions (tpy)
Reactive Organic Compounds (ROG)	54	54	10
Oxides of Nitrogen (NO _x)	54	54	10
Respirable Particulate Matter (PM ₁₀)	82 (Exhaust)	82	15
Fine Particulate Matter (PM _{2.5})	54 (Exhaust)	54	10

Notes: tpy = tons per year; lbs/day = pounds per day. PM₁₀ and PM_{2.5} fugitive dust emissions require implementation of best management practices (BMPs), BAAQMD = Bay Area Air Quality Management District.

Source: BAAQMD 2023.

TOXIC AIR CONTAMINANTS

According to the *2013 Edition of the California Almanac of Emissions and Air Quality*, health risks from toxic air contaminants (TACs) can largely be attributed to relatively few compounds, the most important being diesel PM (CARB 2013:5-2 to 5-4). Diesel PM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although diesel PM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emissions control system is being used. Unlike other TACs, no ambient monitoring data are available for diesel PM because no routine measurement method currently exists. However, CARB has made preliminary concentration estimates based on a PM exposure method. This method uses the CARB emissions inventory’s PM₁₀ database, ambient PM₁₀ monitoring data, and the results from several studies to estimate concentrations of diesel PM. In addition to diesel

PM, the TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene. Overall, levels of most TACs, except para-dichlorobenzene and formaldehyde, have decreased since 1990.

ODORS

Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

SENSITIVE RECEPTORS

Sensitive receptors are generally considered to include those land uses where exposure to pollutants could result in health-related risks to sensitive individuals, such as children or the elderly. Residential dwellings, schools, hospitals, playgrounds, and similar facilities are of primary concern because of the presence of individuals particularly sensitive to pollutants and/or the potential for increased and prolonged exposure of individuals to pollutants.

Air quality sensitive receptors in the vicinity of the project site include nearby residents and campers at the Russian River Campground. The closest sensitive receptor to the proposed project is a single-family residence located less than 50 feet to the west from Geysers Road and the proposed connector path, and a single-family residence located approximately 270 feet southwest of the most southern end of the project boundary. The Russian River RV Campground is located approximately 50 feet from Geysers Road the proposed connector path.

3.7.2 Discussion

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

No impact. The project is located in the NCAB, where air quality is regulated by NoSoCo Air. The NCAB is in attainment for all state and federal ambient air quality standards. Therefore, NoSoCo Air is not required to prepare or implement an air quality plan and there is no applicable air quality plan. Therefore, no conflict with an applicable air quality plan would occur and there would be **no impact**.

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

Less than significant with mitigation incorporated. Under a project-level analysis, the BAAQMD CEQA Guidelines identifies whether a project would violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation through average pounds per day significance thresholds. BAAQMD's project level thresholds were developed to bring the SFBAAB into attainment for the NAAQS and CAAQS and to be protective of human health. In addition, mass emissions threshold levels also consider the anticipated level of development and associated emissions that could potentially occur within a basin, as well as the pollutants of greatest concern. For example, areas in the state where ROG is a greater problem than PM might have lower ROG thresholds. The SFBAAB is in nonattainment for the state ozone and PM standards while the portion of the NCAB where the project is located is attainment for ozone and PM. However, on a seasonal basis, the NCAB experiences exceedances of the PM standards associated with wood burning. Thus, similar to the SFBAAB, PM is a pollutant of concern. Given that NoSoCo Air has not established thresholds and NCAB's attainment status, it would be reasonable to assume that if thresholds had been adopted, they would be similar to what BAAQMD has adopted regarding PM and potentially higher regarding other pollutants. Thus, given that NoSoCo Air has not adopted thresholds of significance for CEQA purposes, it is reasonable and conservative to apply BAAQMD's thresholds for this analysis. Thus, project-generated construction and operational emissions, in comparison to BAAQMD thresholds, are presented below separately.

Construction Emissions of Criteria Pollutants and Precursor Emissions

Project construction would involve site preparation, vegetation clearing, rough grading, excavation and foundation work, and paving, all of which have the potential to generate air pollutant emissions from heavy equipment use, worker commute trips, and vendor and haul truck activity. Worst-case construction and operation-generated emissions were estimated using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.21 (CAPCOA 2023). Modeling was based on project-specific information (e.g., construction schedule, equipment type, trip generation rates, and acres disturbed) and reasonable assumptions based on typical construction activities. Where project-specific details were unavailable, default values in CalEEMod were used based on the project's location and land use type. For detailed assumptions and modeling inputs, refer to Appendix A.

Table 3.7-3 summarizes the estimated average daily emissions of ROG, NO_x, PM₁₀ and PM_{2.5} during project construction.

Table 3.7-3 Summary of Unmitigated Construction Emissions of Criteria Pollutants and Precursor Emissions in Pounds per Day

Emissions Source	ROG	NO _x	CO	PM ₁₀ Dust	PM ₁₀ Exhaust	PM _{2.5} Dust	PM _{2.5} Exhaust
2024 Average Daily Emissions	<1	4	5	12	<1	1	<1
2025 Average Daily Emissions	<1	4	6	18	<1	2	<1
BAAQMD Emissions Threshold	54	54	N/A	N/A	82 ¹	N/A	54 ¹
Exceed Threshold?	No	No	No	N/A	No	N/A	No

Notes: ROG = Reactive Organic Gases; NO_x = Oxides of Nitrogen; PM₁₀ = Particulate matter 10 micrometers or less in diameter; PM_{2.5} = Fine particulate matter.

Note: Conservatively assumed 420 total days of construction based on 16-month construction schedule and a 6 day work week to determine worst-case emissions for comparison to applicable thresholds of significance. Construction is expected to primarily occur in 2025. Construction emissions in 2026 would be similar to those presented for 2024 and 2025.

¹ Exhaust emissions only

Source: Appendix A (calculations by Ascent in 2024).

As shown in Table 3.7-3, project-generated construction emissions of criteria air pollutants and ozone precursors would not exceed BAAQMD's thresholds of significance. However, no thresholds of significance exist for fugitive dust emissions. Within the SFBAAB, due to its nonattainment status of PM, all projects that generate fugitive dust emissions are considered to contribute substantially to the nonattainment status and are required to incorporate dust control measures to reduce these emissions to the extent feasible. Given that PM emissions continue to cause exceedances of the CAAQS, additional emissions generated by project construction would further contribute to this existing adverse air quality condition.

Operational Emissions of Criteria Pollutants and Precursor Emissions

Long-term emissions sources associated with project operation would include area sources (e.g., landscape equipment, consumer products, maintenance activities) and mobile sources (i.e., vehicle trips to the project site). As discussed in Section 3.17, "Transportation," the project would result in up to 73 new daily trips. These new trips would result in mobile criteria air pollutant emissions. As shown in Table 3.7-4, operational emissions are well below the applicable daily and annual thresholds for all criteria pollutants and ozone precursors.

Table 3.7-4 Summary of Operational Emissions of Criteria Pollutants and Precursor Emissions in Pounds per Day and Tons per Year

Emissions Source	ROG lbs/day	NOx lbs/day	CO lbs/day	PM ₁₀ Dust lbs/day	PM ₁₀ Exhaust lbs/day	PM _{2.5} Dust lbs/day	PM _{2.5} Exhaust lbs/day
Mobile Average Daily Emissions	<1	<1	<1	<1	<1	<1	<1
Area Average Daily Emissions	<1	<1	<1	<1	<1	<1	<1
Total Average Daily Emissions	<1	<1	<1	<1	<1	<1	<1
BAAQMD Emissions Threshold	54	54	N/A	N/A	82 ¹	N/A	54 ¹
Exceed Threshold?	No	No	N/A	N/A	No	N/A	No
Emissions Source	ROG (tpy)	NOx (tpy)	CO (tpy)	PM ₁₀ Dust (tpy)	PM ₁₀ Exhaust (tpy)	PM _{2.5} Dust (tpy)	PM _{2.5} Exhaust (tpy)
Mobile	<1	<1	<1	<1	<1	<1	<1
Area	<1	<1	<1	<1	<1	<1	<1
Annual Emissions	<1	<1	<1	<1	<1	<1	<1
BAAQMD Emissions Threshold	10	10	N/A	N/A	15 ¹	N/A	10 ¹
Exceed Threshold?	No	No	N/A	N/A	No	N/A	No

Notes: ROG = Reactive Organic Gases; NOx = Oxides of Nitrogen; PM₁₀ = Particulate matter 10 micrometers or less in diameter; PM_{2.5} = Fine particulate matter; tpy = tons per year.

¹ Exhaust emissions only

Source: Appendix A (calculations by Ascent in 2024).

Summary

The project would not exceed applicable construction-related or operational thresholds for criteria air pollutants or ozone precursors. However, because the project would contribute fugitive PM emissions that can contribute to poor air quality during certain times of the year, the project's contribution to fugitive dust during construction would be a **potentially significant** impact.

Mitigation Measures

Mitigation Measure AQ-1: Implement Construction Dust Reduction Measures

To reduce construction-related fugitive dust emissions, the construction contractor shall ensure that all construction activities comply with the following measures during all phases of project construction.

- ▶ All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- ▶ All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- ▶ All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- ▶ All vehicle speeds on unpaved roads shall be limited to 15 mph.
- ▶ All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- ▶ Any paving and/or concrete pads shall be completed as soon as possible after grading unless seeding or soil binders are used. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.
- ▶ All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- ▶ Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel.

- ▶ Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- ▶ All construction equipment shall be maintained and properly tuned in accordance with manufacturer specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- ▶ A publicly visible sign shall be posted with the telephone number and person to contact at Regional Parks regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Significance After Mitigation

Mitigation Measure AQ-1 would require the implementation of dust control measures during project construction, which would reduce fugitive dust emissions and exhaust from construction equipment through activities such as watering of exposed surfaces, limiting vehicle speeds on unpaved areas, and reducing equipment idling times. Implementation of these dust control measures would reduce the project's fugitive dust emissions to levels that would not be considered significant. Operational emissions of criteria air pollutants and ozone precursors would not exceed any applicable daily or annual threshold of significance. Thus, the project would not result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is non-attainment under federal or state ambient air quality standards and the impact would be **less than significant with mitigation incorporated**.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant. The closest sensitive receptors to the proposed connector path are a single-family residence located 30 feet to the west of Geysers Road and the Russian River RV Campground located approximately 50 feet from the proposed connector path. The closest receptor to the access area related improvement activities is a single-family residence located approximately 270 feet southwest of Access Area 3.

The potential cancer risk from inhaling diesel PM outweighs the potential for all other diesel PM-related health impacts (i.e., non-cancer chronic risk, short-term acute risk) and health impacts from other TACs (CARB 2015). With regard to exposure to diesel PM, the dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher level of health risk for any exposed receptor. Thus, the risks estimated for an exposed individual are higher if a fixed exposure occurs over a longer period. According to the Office of Environmental Health Hazard Assessment, when a health risk assessment is prepared to project the results of exposure of sensitive receptors to selected compounds, exposure of sensitive receptors to TAC emissions should be based on a 70- or 30-year exposure period; however, such assessments should be limited to the duration of activities associated with the proposed project if emissions occur for shorter periods (OEHHA 2015:5-23, 5-24).

Construction

Construction-related activities would result in temporary, intermittent emissions of diesel PM from the exhaust of off-road, heavy-duty diesel equipment, and on-road haul trucks (i.e., for the removal of green waste, soils that are not reused on-site, and up to 20 trees). Construction activities would occur at a minimum of 30 feet away from the nearest sensitive receptor.

The results of emissions modeling show that average daily emissions of exhaust PM₁₀ would not exceed 1 lb/day during construction compared to BAAQMD's threshold of 82 lbs/day. Implementation of Mitigation Measure AQ-1 would help to reduce diesel exhaust by limiting equipment idling time and ensuring all construction equipment is maintained and properly tuned in accordance with manufacturer specifications. Considering the low level of emissions relative to BAAQMD's threshold, the highly dispersive properties of diesel PM, and the relatively low mass of diesel PM emissions that would be generated at any single place during project construction (i.e., construction activities would move throughout the project

site over the 16-month construction period), construction-related TACs would not expose sensitive receptors to an incremental increase in cancer risk that exceeds 10 in one million or a Health Index greater or equal to 1.0.

Operations

The project would not result in any stationary sources of TAC emissions (e.g., mechanical equipment, combustion engines); however, the project could result in mobile sources of PM exhaust associated with project generated vehicle trips and landscaping equipment used for maintenance activities. As shown in Table 3.7-4, PM exhaust emissions resulting from project operations are minor (i.e., less than 1 ton per year and 1 pound per day), represent a conservative estimate, and are below BAAQMD threshold for PM. As a result, operation of the project would not result in a substantial increase in concentrations of diesel PM at or near the project site. Thus, operational TACs would not expose sensitive receptors to an incremental increase in cancer risk that exceeds 10 in one million or a Health Index greater or equal to 1.0.

Summary

Because of the dispersive properties of diesel PM and the relatively low mass diesel PM emissions that would be generated in one place during the construction and operation of the project, project related TACs would not expose sensitive receptors to an incremental increase in cancer risk that exceeds 10 in one million or a Hazard Index of 1.0 or greater during project construction or operation. This impact would be **less than significant**.

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

Less than significant. The project would include the development of public access and recreation features within an undeveloped area and would not result in the introduction of any new permanent sources of odors to the area. Because construction-related odors would be intermittent, temporary, and would disperse rapidly with distance from the source, construction-related odors would not result in the frequent exposure of a substantial number of individuals to objectionable odors.

With respect to operation, BAAQMD's CEQA Air Quality Guidelines (2023) identifies land uses associated with odor complaints to include, but are not limited to, wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants. Open space recreational uses are not land uses that typically generate odors. There would be up to four vault toilets on-site that may generate odors, however the restrooms would be serviced routinely, and odors would be generated intermittently and would not affect a substantial number of people given the remote nature of the project site. Therefore, the proposed project would not generate objectionable odors affecting a substantial number of people, and the impact would be **less than significant**.

3.8 BIOLOGICAL RESOURCES

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

3.8.1 Environmental Setting

This section describes biological resources that may be present in the project site and immediate vicinity and evaluates potential impacts to such resources as a result of project implementation. This analysis is based on the Biological Resources Report, the Botanical Survey Report, and the Aquatic Resource Delineation Report that were prepared for the project in 2020 (Appendix B), a review of the California Natural Diversity Database (CNDDB 2023), the California Native Plant Society's Rare Plant Inventory (CNPS 2023), and other relevant data sources.

The project site totals approximately 25 acres and extends 1.75 miles along the west side of Geysers Road and the east bank of the Russian River (see Figure 2-2). The analysis of biological resource impacts includes the permanent disturbance footprint associated with trails, parking areas, and other permanent amenities; the temporary disturbance

areas associated with construction that would occur within the project site; and the proposed invasive species management. Figures 2-3 through 2-5 in Chapter 2, "Project Description," depict the proposed project features.

VEGETATION AND HABITAT TYPES

The project site is located along Geysers Road in northern Sonoma County, approximately 1.5 miles north of the City of Cloverdale; and east of US 101, the Northwestern Pacific Railroad, and the Russian River (see Figure 2-1). Elevation within the project site ranges from approximately 315 feet to 450 feet above sea level (Appendix B). A large portion of the 25-acre project site (approximately 11 acres) is within the right-of-way of Geysers Road where vegetation consists of ruderal species such as yellow star thistle (*Centaurea solstitialis*) and black mustard (*Brassica nigra*). Outside of the Geysers Road right-of-way, annual grassland, chaparral, riparian woodland, pine woodland, mixed oak woodland, and wash habitats are also present within the project site (Appendix B).

SPECIAL-STATUS SPECIES

Special-status species include botanical species (plants, lichen, bryophytes, and fungi) and animals that are legally protected or otherwise considered sensitive by federal, state, or local resource agencies and conservation organizations. In this document, special-status species are defined as botanical species and animals in the following categories.

- ▶ Listed or proposed for listing as threatened or endangered under the federal Endangered Species Act (ESA).
- ▶ Designated as a candidate for listing as threatened or endangered under ESA.
- ▶ Listed, proposed for listing, or a candidate for listing as threatened or endangered under the California Endangered Species Act (CESA).
- ▶ Listed as fully protected under the California Fish and Game Code (CFGF).
- ▶ Animals identified by California Department of Fish and Wildlife (CDFW) as species of special concern.
- ▶ Plants considered by CDFW to be "rare, threatened or endangered in California" (California Rare Plant Ranks of 1A, presumed extinct in California; 1B, considered rare or endangered in California and elsewhere; 2A, presumed to be extinct in California but more common elsewhere; and 2B, considered rare, threatened, or endangered in California but more common elsewhere). The California Rare Plant Ranks correspond with and replace former California Native Plant Society listings. While these rankings do not afford the same type of legal protection as ESA or CESA, the uniqueness of these species requires special consideration under State CEQA Guidelines Section 15380.
- ▶ Considered a locally significant species, that is, a species that is not rare from a statewide perspective but is rare or uncommon in a local context such as within a county or region (CEQA Section 15125 [c]) or is so designated in local or regional plans, policies, or ordinances (State CEQA Guidelines, Appendix G).
- ▶ Otherwise meet the definition of rare or endangered under CEQA Sections 15380(b) and (d).

3.8.2 Discussion

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

No impact (special-status botanical species) and Less than significant with mitigation incorporated (special-status wildlife).

Special-Status Botanical Species

Potentially suitable habitat for special-status plants occurs within the project site, 11 special-status plants have the potential to occur within the project site, and special-status plants are known to occur in the project vicinity (Appendix B)

(CNPS 2023). However, a botanical survey of the project site conducted during the blooming period for the 11 special-status botanical species with potential to occur did not identify any special-status plants (Appendix B). Based on the timing of the botanical survey and the lack of special-status plants found, the project would not result in adverse effects on special-status plant species and **no impact** would occur as a result of the project.

Special-Status Fish

There are eight special-status fish species with at least a moderate potential to occur within the Russian River located adjacent to the project site (Appendix B) (CNDDB 2023). While the Northern California distinct population segment (DPS) winter-run of steel head occurs in the general region of the project, this DPS is not present within the Russian River or its tributaries. Of the eight species with at least a moderate potential to occur, Riffle sculpin (*Cottus gulosus*), Pacific lamprey (*Entosphenus tridentatus*), Sacramento hitch (*Lavinia exilicauda* spp. *exilicauda*), Russian River roach (*Lavinia symmetricus*), and hardhead (*Mylopharodon conocephalus*) are California species of special concern. The Central California Coast Evolutionary Significant Unit (ESU) of coho salmon (*O. kisutch*) is designated as endangered under both ESA and CESA. The Central California Coast DPS of steelhead (*Oncorhynchus mykiss* spp. *irideus*) and California Coast ESU of chinook salmon (*O. tshawytscha*) are both designated as threatened under ESA, and critical habitat and primary constituent elements (PCEs) of critical habitat for both species (e.g., rearing sites, freshwater migration corridors) (70 FR 52487) are located within the Russian River and near the project site.

Trail construction below the top of the bank of the Russian River is not anticipated to result in tree removal. The construction of the connector path may result in the removal of up to 20 trees within oak woodland; however, the location of this tree removal (Figure 2-3 through Figure 2-5) would not result in changes to shading of the Russian River that could affect special-status fish. In addition, no project features would be placed below the ordinary high-water mark (OHWM) of the river. Giant reed (*Arundo donax*) removal in the project site, performed using hand and cutting tools, is not anticipated to result in substantial ground disturbance that would result in sedimentation of the river, and would potentially result in improvement of habitat on the riverbank. Over the long-term, the project would reduce pollution, dumping, and erosion that currently occur at the project site, which have an adverse effect on water quality.

Ground-disturbing construction activities that are conducted during the wet season could result in erosion, sedimentation, and runoff into the river, which could indirectly adversely affect special-status fish and critical habitat for steelhead and chinook salmon. Installation of temporary erosion control best management practices (BMPs) (e.g., waddles, silt fencing) would prevent indirect effects to special-status fish and critical habitat for steelhead and chinook salmon by preventing contaminated runoff from construction of project features above the top of the bank of the Russian River from reaching the river. However, portions of the project (e.g., trails, invasive plant removal) would occur below the top of the bank of the Russian River (Figures 2-3 and 2-5). While the proposed trails below the top of the bank of the Russian River would occur partially within the footprint of existing informal trails and would resolve current erosion issues associated with these trails, construction of these features during the wet season could result in contaminated runoff and sediment flowing into the Russian River, due to the steep slope of the riverbank and the proximity of construction to the river itself. This contaminated runoff and sediment could have a substantial negative impact on steelhead, chinook salmon, and PCEs of critical habitat for steelhead or chinook salmon. Therefore, the project would have a **potentially significant** impact on special-status fish and on critical habitat for Central California Coast DPS Steelhead and California Coast ESU of chinook salmon.

Mitigation Measures

Mitigation Measure BIO-1: Avoid and Minimize Runoff from Trail Construction on the Bank of the Russian River

Regional Parks will limit ground-disturbing activities below the top of the bank of the Russian River to between April 1 and October 15, or within an operating season as otherwise required by the North Coast Regional Water Quality Control Board.

Within the operating season, in addition to the application of standard construction water quality best management practices (e.g., straw waddles and silt fencing), Regional Parks will suspend ground-disturbing activities below the top of the bank of the Russian River if: (1) it is raining, or (2) soils are saturated. Regional Parks will be prepared to completely suspend ground-disturbing activities below the top of the bank prior to the initiation of any rain event.

Activities that cause soil disturbance may resume below the top of the bank when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include: (1) areas of ponded water; (2) water carrying fine sediment out of the soil or disturbed areas, (3) loss of soil bearing strength resulting in the deflection of soil or trail surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) tire track imprints in the soil.

Significance after Mitigation

Mitigation Measure BIO-1 would avoid and reduce potential impacts on special-status fish from the implementation of the proposed project by limiting ground-disturbing activities below the top of the bank of the Russian River to between April 1 and October 15 and suspending ground-disturbing activities in these areas when it is raining or soils are saturated. This would prevent construction-related erosion, sedimentation, and construction debris from entering stormwater and flowing into the Russian River. Therefore, with the implementation of Mitigation Measures BIO-1, the impact on special-status fish would be **less than significant with mitigation incorporated**.

Special-Status Amphibians and Reptiles

There are two special-status amphibians with potential to occur in the project site: foothill yellow-legged frog, northwest/north coast clade (*Rana boylei*) and red-bellied newt (*Taricha rivularis*) (Appendix B) (CNDDDB 2023). Both of these special-status amphibians are California species of special concern. In addition, one special-status reptile could occur on the project site, the western pond turtle (*Emys marmorata*), which is also a California species of special concern and proposed for listing under the ESA (Appendix B).

Foothill yellow-legged frog is a highly aquatic species that is associated with perennial waters such as the Russian River. Foothill yellow-legged frog is rarely found farther than 36 to 150 feet from perennial water (CDFW 2018); however, the project site is within this distance from the river and the species may occur throughout the project site, particularly following rains and within wetlands. Similar to foothill yellow-legged frog, red-bellied newt breeds in perennial waters; however, this species spends its adult life in upland habitats such as the woodlands found in the project site. Western pond turtle is another highly aquatic species; however, this species uses upland habitat adjacent to aquatic habitat (e.g., rivers, streams, ponds) for nesting during the spring and summer (April to July) (Appendix B).

The proposed project would occur within and adjacent to suitable habitat for special-status amphibians and reptiles. During construction, grading new trails and other ground-disturbing project activities that would occur on the bank of the Russian River could result in erosion, sedimentation, and runoff into the river, which could indirectly adversely affect suitable aquatic habitat. Project construction could also result in removal of suitable upland habitat within the project site. As discussed above for special-status fish, no work would occur below the OHWM or within the wetted portion of the Russian River channel during construction, and the majority of project features would be placed in existing disturbed areas and thus would not remove upland habitat. In addition, the installation of temporary erosion control BMPs (e.g., wattles, silt fencing) would prevent the runoff of contaminants to aquatic habitat from construction activities above the top of the bank of the river. Furthermore, the project would reduce adverse effects on water quality associated with existing informal use of the project site (e.g., dumping, pollution, erosion). However, construction of trails and other features below the top of the bank of the Russian River during the wet season could result in contaminated runoff and sediment flowing into the Russian River. This contaminated runoff and sediment could have a potentially adverse effect on aquatic habitat for special-status amphibians and reptiles.

During construction, grading new trails and other ground disturbance could also result in the injury or death of individual special-status amphibians due to crushing by equipment and entrapment in trenches and monofilament materials. Upland habitats within the project area may provide habitat suitable for foothill yellow-legged frog. In addition, the project would be constructed during the nesting season for western pond turtle and red-bellied newts may be present year-round on the project site. Therefore, construction of the project could result in injury or death of individual special-status amphibians and reptiles, and loss of western pond turtle nests, should they be present. The injury or death of individuals and loss of western pond turtle nests may have substantial adverse effects on the local and regional populations of these species and would be a **potentially significant** impact.

Mitigation Measures

Mitigation Measure BIO-2a: Conduct Worker Environmental Awareness Training

Regional Parks will require environmental awareness training for all construction workers conducted by a qualified biologist or biological monitor prior to construction activities. Training will include identification of special-status species that may occur in the project site; procedures to follow if a special-status species is observed within the project site; and other environmental best management practices such as marking of sensitive habitats, hazardous material handling, spill response, and trash control.

Mitigation Measure BIO-2b: Avoid and Minimize Impacts to Special-Status Amphibians and Reptiles

Regional Parks will implement the following measures to reduce and avoid injury or death of special-status amphibians and reptiles and avoid the loss of western pond turtle nests.

- ▶ Pre-construction surveys for special-status amphibians and reptiles will be conducted by a qualified biologist within 48 hours before ground disturbance and vegetation clearing. The surveys will encompass all work areas within suitable habitat for special-status amphibians and reptiles as determined by the qualified biologist. If special-status amphibians and reptiles are discovered during the surveys, the occurrence will be noted and the animal will be allowed to leave the work area on its own; however, animals may be moved to suitable habitat for the species, outside of the construction area, by a qualified biologist with the appropriate permits, if it does not leave on its own.
- ▶ If any western pond turtle nests are located during pre-construction surveys, a 50-foot non-disturbance buffer around the nest will be delineated using construction fencing, and no work will occur within this buffer until the young leave the nest.
- ▶ A qualified biological monitor will be present during use of heavy equipment to stop work if individual special-status amphibians/reptiles are present within the work area and injury or death of the animal could occur. Work will stop and the animal will be allowed to leave the work area on its own; however, animals may be moved outside the project site by a qualified biologist with the appropriate permits, if it does not leave on its own.
- ▶ All trenches, holes, and other steep-walled excavations shall be covered or a wildlife escape ramp installed prior to the end of each working day. Prior to the start of work each day, a qualified biological monitor will survey all trenches and similar excavations will be inspected for entrapped wildlife. If wildlife is entrapped, the animal will be allowed to leave the work area on its own; however, animals may be moved to suitable habitat for the species, outside of the project construction site area, by a qualified biologist with the appropriate permits, if it does not leave on its own.
- ▶ The use of monofilament materials shall be prohibited within the project site during construction and operations.

Significance after Mitigation

Mitigation Measures BIO-1, BIO-2a, and BIO-2b would avoid and minimize adverse effects on special-status amphibians and reptiles from project construction by suspending ground-disturbing activities below the top of the bank of the Russian River when it is raining or soils are saturated, conducting worker education, conducting surveys prior to construction, implementing non-disturbance buffers around western pond turtle nests, avoiding entrapment, and stopping work when individual animals are at risk of injury or death from heavy equipment. Therefore, with the implementation of Mitigation Measures BIO-1, BIO-2a and BIO-2b, the impact to special-status amphibians and reptiles would be **less than significant with mitigation incorporated**.

Special-Status Raptors

Based on evaluation of known species occurrences and habitat, two special-status raptors may occur within the project site (Appendix B) (CNDDDB 2023). Bald eagle (*Haliaeetus leucocephalus*) is listed as endangered under CEQA, is a fully protected species under the CFGC, and is protected by the Bald and Golden Eagle Protection Act (BGEPA). Golden eagle (*Aquila chrysaetos*) is also a fully protected species under the CFGC and protected by the BGEPA. Bald eagles normally nest in large trees or rocky outcrops near fish bearing waters, such as the Russian River, and while they are opportunistic in their foraging, they primarily forage on large rivers and lakes. Golden eagles use similar structures for nesting, but

forage in grasslands, oak and pine woodlands, and similar habitats (Appendix B). While bald eagles and golden eagles are not known to nest within the project site, and no individuals of either species were observed during reconnaissance surveys (Appendix B), suitable nesting sites (e.g., large trees) and foraging habitat for both species are present in the project site and vicinity.

Foraging and nesting habitat could be altered by tree removal and construction of project features along the bank of the Russian River. However, the majority of project features would be constructed in areas that have been previously disturbed (e.g., existing vehicle pullouts and trails), and would not result in substantial foraging or nesting habitat alteration. Tree removal may occur during construction of the connector path, which could inadvertently remove foraging and nesting habitat for special-status eagles. However, tree removal would occur directly adjacent to Geysers Road where trees would be of limited use for perching and nesting due to existing travel on the road. In addition, the project site is currently used for informal recreation and illegal activities such as dumping. By formalizing recreation and increasing active management, the project would result in a reduction of pollution, dumping, and other activities with the potential to degrade habitat. The proposed project would not result in substantial physical loss of foraging or nesting habitat from project activities and would reduce adverse effects associated with informal recreation; therefore, the project would not have a substantial adverse effect on foraging or nesting habitat for these species.

While the project would not have a substantial adverse effect on foraging or nesting habitat, noise and human activity associated with the construction of the project could result in the disturbance of individual bald eagle or golden eagle nests during the nesting season (February 1 – August 31) if any active bald eagle nests are present within 0.5 mile or golden eagle nests within 1 mile of construction activities. The disturbance of active nests could lead to nest abandonment or interruption of the feeding of nestlings and result in the loss of eggs or nestlings. The loss of eggs or nestlings would be a substantial adverse effect on the local populations of these species; therefore, impacts to bald eagles and golden eagles would be **potentially significant**.

Mitigation Measures

Mitigation Measure BIO-3: Avoid and Minimize Impacts to Nesting Eagles

For construction during the nesting season (February 1 – August 31), Regional Parks will require that a survey for nesting eagles be conducted within 14 days of construction by a qualified biologist. The survey will encompass the area within 1 mile of the project site. If nesting bald eagles are identified during the survey, a 660-foot non-disturbance buffer will be implemented around the nest site, and if nesting golden eagles are identified, a 1 mile non-disturbance buffer will be implemented. Within these buffers work will be postponed until the young have fledged or the nest is otherwise abandoned as determined by a qualified biologist. The nest buffer may be adjusted by the qualified biologist in consultation with the US Fish and Wildlife Service and California Department of Fish and Wildlife based on the type of activity, ambient noise and disturbance levels, topography, nest height, and screening vegetation as appropriate.

Significance after Mitigation

Mitigation Measure BIO-3 would avoid and minimize adverse effects on nesting bald eagles and golden eagles from the implementation of the proposed project by conducting surveys for nests prior to construction and through implementation of non-disturbance buffers if nests are identified. Therefore, with the implementation of Mitigation Measure BIO-3, the impact to bald eagles and golden eagles would be **less than significant with mitigation incorporated**.

Special-Status Bats

Two special-status bats, Townsend's big-eared bat (*Corynorhinus townsendii*) and western red bat (*Lasiurus blossevillei*), could roost and forage within the project site (Appendix B) (CNDDDB 2023). Both of these species are California species of special concern. Townsend's big-eared bat roosts are most often associated with mines and caves; however, they may use hollow trees as well. Maternity roosts of Townsend's big-eared bat may contain just a few or several hundred bats and maternity roosts form as early as March with pups born from May to July (Western Bat Working Group 2005). Unlike Townsend's big-eared bat, western red bats roost individually in dense clumps of foliage in riparian trees, orchards, and ornamental trees (Appendix B). Western red bats give birth to pups in June and the pups typically fly by August (Shump and Shump 1982).

Foraging and roosting habitat could be altered by tree and other vegetation removal. However, the majority of project features would be constructed in areas that are currently disturbed by existing pullouts and trails. Tree removal may occur during construction of the connector path; however, removal would occur directly adjacent to Geysers Road where existing disturbance from vehicle traffic makes habitat only marginally suitable. The removal of giant reed would not alter roosting habitat, as giant reed is not suitable for bat roosts. In addition, the project site is currently used for informal recreation and illegal activities such as dumping. By formalizing recreation and increasing active management, the project would result in a reduction of pollution, dumping, and other activities with the potential to degrade habitat. The proposed project would not result in substantial physical loss of foraging or roosting habitat from project activities and would reduce adverse effects associated with informal recreation; therefore, the project would not have a substantial adverse effect on foraging or roosting habitat for these species.

Nonetheless, the removal of trees could result in the physical destruction of roosts and noise during construction could disturb the roosts of Townsend's big-eared bat and western red bat if roosts are present in or near the project site. If roosts are removed or disturbed, the injury or death of adults could occur. If disturbed or removed during the breeding season, the injury or death of pups could also occur, including loss of maternity colonies with hundreds of pups. The injury or death of adult bats or pups would be a substantial adverse effect on the local and regional populations of these species and therefore would be a **significant** impact.

Mitigation Measures

Mitigation Measure BIO-4: Avoid and Minimize Impacts to Special-Status Bat Roosts

To avoid and minimize impact to special-status bat roosts, Regional Parks will implement the following measures.

- ▶ Within 14-days prior to initiating work, a qualified bat biologist will inspect the project footprint and adjacent areas within 250 feet for bat roosts (most likely mature trees in the riparian woodland, pine woodland, and mixed oak woodland portions of the project site). Surveys will consist of a daytime pedestrian survey looking for evidence of bat use (e.g., guano) and/or an evening emergence survey to note the presence or absence of bats within potential roosts.
- ▶ If no bat roosts are found, then no further mitigation will be required. If evidence of bat use is observed, the number and species of bats using the roost will be determined. Acoustic bat detectors may be used to supplement survey efforts if needed to determine the species of roosting bats, but are not required.
- ▶ If an active maternity roost is detected, a qualified biologist shall determine an appropriate avoidance buffer to be maintained from March 1 until young are flying (typically through August). If an active maternity roost is detected in a tree or other vegetation planned for removal, or within a zone of influence (i.e., noise, vibration) that could result in roost abandonment, as determined by a qualified biologist, the bats shall be safely evicted under the guidance of a qualified biologist. Prior to eviction, Regional Parks will develop a Bat Roost Exclusion Plan. The plan will include measures for exclusion, restrictions on ambient temperature during exclusion, and a proposal to compensate for the removed roost (e.g., installation of bat houses). The Bat Roost Exclusion Plan will be submitted to CDFW for approval prior to implementation.
- ▶ If roosts of Townsend's big-eared bat or western red bat are determined to be present within the project site and within 250 feet of construction, work may be performed within the 250-foot buffer outside of the breeding season (March 1 through August 31) when the daytime temperature is 50 degrees Fahrenheit or greater.

Significance after Mitigation

Mitigation Measure BIO-2a and Mitigation Measure BIO-4 would avoid and minimize adverse effects on special-status bats from the implementation of the proposed project by conducting worker education, conducting surveys for roosts prior to construction, implementation of non-disturbance buffers, and development and implementation of a CDFW approved Bat Roost Exclusion Plan, if required. Therefore, with the implementation of Mitigation Measure BIO-2a and Mitigation Measure BIO-4, the impact to special-status bats would be **less than significant with mitigation incorporated**.

Ringtail

Ringtail (*Bassariscus astutus*) is a fully protected species under the CFGC. The species is not tracked in the CNDDDB, and therefore, there are no records in that database of the species in the project site or vicinity. Ringtail is a nocturnal species and typically occurs in riparian areas, forests (including stands of various ages), and shrub habitats. Potential denning or resting habitat includes large hardwoods, large conifers, snags, rock outcrops, crevices, brush, and slash piles. The ringtail breeding season occurs from February through June but peaks in March and April. Gestation is approximately 40 to 50 days, and females typically give birth to one to five kits from May to June (CWHR 2005). Once the kits are mobile, female ringtails will move to different dens with the kits. Suitable habitat for ringtail is present within the project site in the form of riparian and oak woodland habitat and it is within the species known range.

While the project would occur within suitable habitat for ringtail, construction of the project would not result in the physical destruction of ringtail denning habitat. Grading for the project would occur primarily within existing disturbed areas, or directly adjacent to disturbed areas where there is existing recreational use and denning is unlikely. Similarly, the potential removal of trees along Geysers Road would not result in direct removal of ringtail dens as the high level of disturbance from the road makes the use of these trees as dens unlikely. The removal of giant reed within the project site would not remove denning habitat because although ringtail den in patches of dense shrubs, the vertical growth form of giant reed would not provide cover from ringtail predators and is therefore not denning habitat. In addition, the area of vegetation removal associated with giant reed removal and construction of project features would not be substantial when compared to the available foraging habitat within the project site and vicinity. Furthermore, the project site is currently used for recreation, and the project would formalize this use and reduce pollution, dumping, and other activities with the potential to degrade habitat. The proposed project would not result in substantial physical loss of foraging or denning habitat from project activities, would reduce impacts associated with informal recreation, and would not substantially increase the amount of recreation in the project site; therefore, the project would not have a substantial adverse effect on foraging or denning habitat for ringtail.

The elevated noise and activity associated with construction activities and giant reed removal could result in indirect disturbance of ringtail dens if present in the project site. If this disturbance occurs outside of the maternity denning season, then the ringtail is likely to simply move to avoid the disturbance. However, if the disturbance occurs during the maternity denning season before kits are mobile (May 1 through June 30) this could result in abandonment of the young or interruption of feeding of kits if they are present in the den, which could result in injury or death. The injury or death of kits would be a substantial adverse effect on the local and regional population of the species and would be a **significant** effect.

Mitigation Measures

Mitigation Measure BIO-5 Avoid Ringtail Maternity Dens:

To avoid and minimize impacts to ringtail, Regional Parks will implement the following measures.

- ▶ No more than 14-days prior to ground disturbance or vegetation clearing, a qualified biologist will conduct pre-construction surveys for active ringtail den sites within 0.25 mile of proposed project features, as access allows.
- ▶ If any active ringtail dens are located during surveys, a non-disturbance buffer will be placed around the den during the period of May 1 through June 30 to avoid disturbance of the den. The size of the non-disturbance buffer will be determined by a qualified biologist based on the activities occurring near the den, vegetative screening of the den, and other relevant information. No project activities will occur within the non-disturbance buffer during that period.

Significance after Mitigation

Mitigation Measure BIO-2a and Mitigation Measure BIO-5 would avoid and minimize adverse effects on ringtail from the implementation of the proposed project by conducting worker education, surveys for active dens prior to construction, and implementation of a non-disturbance buffer around active dens during the maternity season. Therefore, with the implementation of Mitigation Measure BIO-2a and Mitigation Measure BIO-5, the impact to ringtail would be **less than significant with mitigation incorporated**.

Common Nesting Birds

While common raptors and other nesting birds do not fit the criteria for special-status species as defined in this analysis, it is standard practice for land management agencies such as Regional Parks to analyze project impacts to common raptors and other common nesting birds protected under Section 3503 and Section 3503.5 of the CFGC and the Migratory Bird Treaty Act. Therefore, active nests of common nesting birds are considered sensitive resources for the purposes of this analysis.

Noise and other disturbances created during construction activities (e.g., human presence, heavy equipment use), and tree and other vegetation removal could result in the disturbance or destruction of nests of ground, shrub, and tree nesting birds within the project site, which could lead to nest abandonment and the loss of eggs and young. The loss of eggs and young if many nests are disturbed could be a substantial adverse effect on the local populations of these species; therefore, impacts to common nesting birds would be **potentially** significant.

Mitigation Measures

Mitigation Measure BIO-6: Avoid and Minimize Impacts to Common Nesting Birds

For construction and vegetation removal that occurs during the nesting bird season (February 1 – August 31), a nesting bird survey will be conducted within 14 days of the start of project activities. The survey will encompass the area within a 300-foot radius for raptors and 50-foot-radius for other birds. If nesting birds are identified, work within these buffer areas will be postponed until the young have fledged or the nest is otherwise abandoned. The buffer size may be altered by a qualified biologist. Factors to be considered for determining changes to buffer size will include presence of natural screening provided by vegetation or topography; nest height above ground; baseline levels of noise and human activity (e.g., roads, recreation); and species sensitivity. Monitoring of the nest by a qualified biologist during and after construction activities shall be required if the activity has potential to adversely affect the nest. If construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the no-disturbance buffer shall be increased until the agitated behavior ceases.

Significance after Mitigation

Mitigation Measure BIO-2a and Mitigation Measure BIO-6 would avoid and minimize adverse effects on common raptors and other nesting birds from the implementation of the proposed project by conducting worker education, surveys for nests prior to construction, and implementation of non-disturbance buffers. Therefore, with the implementation of Mitigation Measure BIO-2a and Mitigation Measure BIO-6, the impact to common raptors and other nesting birds would be **less than significant with mitigation incorporated**.

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

Less than significant with mitigation incorporated. The project site contains several riparian habitats, oak woodlands, and Torrey's melic grass grassland (see Table 3.8-1 below). Torrey's melic grass grassland is designated as a sensitive natural community by CDFW. Oak woodlands are regulated pursuant to the Oak Woodlands Conservation Act, Public Resources Code Section 21083.4, and Sonoma County General Plan policies. Riparian habitat is regulated pursuant to CFGC Section 1602.

Table 3.8-1 Sensitive Habitats and Natural Communities Documented or with Potential to Occur in the Project Site

Sensitive Habitat/Sensitive Natural Community ¹	Rarity Rank	Other Designation	Sonoma Vegetation Map Type	Occurrence Potential
<i>Quercus agrifolia</i> alliance	S4	General Plan Sensitive	Coast live oak woodland	Known to Occur
<i>Quercus agrifolia</i> , <i>Q. douglasii</i> , <i>Q. garryana</i> , <i>Q. kelloggii</i> , <i>Q. lobata</i> , <i>Q. wislizenii</i> , alliance	S4	General Plan Sensitive	Mixed oak forest	Known to Occur

Sensitive Habitat/Sensitive Natural Community ¹	Rarity Rank	Other Designation	Sonoma Vegetation Map Type	Occurrence Potential
<i>Populus fremontii</i> alliance	S3	Riparian	Fremont cottonwood forest	Known to Occur
<i>Salix laevigata</i> , <i>Populus fremontii</i> alliances	S3	Riparian	Mixed riparian Woodland	Known to Occur
<i>Alnus rhombifolia</i> alliance	S4	Riparian	Mixed riparian forest	Known to Occur
<i>Salix lasiolepis</i> , <i>S. exigua</i> alliance	S4	Riparian	Riparian scrub	Known to Occur
<i>Melica torreyana</i> alliance	S2	–	Annual and perennial grassland	Known to Occur

¹ These are designated sensitive natural communities with a state rarity rank of S1 (critically imperiled), S2 (imperiled), S3 (vulnerable), riparian habitats, or designated as sensitive habitats by Sonoma County General Plan. Wetland habitats are discussed in checklist question (c) below.

Source: Appendix B; compiled by Ascent in 2021.

The proposed realignment of the southeasternmost portion of the trail in Access Area 3 could result in loss of a small area of Torrey's melic grass grassland that was identified in the project site (Appendix B). The loss of this sensitive natural community would be a potentially substantial adverse effect. The construction of the connector path may result in the removal of up to 20 trees within oak woodland communities. However, the loss of these trees would not result in a type conversion of oak woodland because tree removal would be minimized through trail design and be spaced over an approximately 1.75-mile alignment. The loss of individual oak trees is discussed in criterion e) below.

No type conversion of any of the riparian habitats listed in Table 3.8-1 is anticipated. While conversion of riparian habitats would not occur, grading for trail widening and realignments would occur below the top of the bank of the Russian River and could result in the minor removal of some riparian vegetation. Giant reed is not considered riparian habitat for the purpose of this analysis, and it would be removed by hand tools; therefore, removal of giant reed would not result in removal of riparian vegetation. In addition, removal of giant reed is anticipated to benefit the remaining native vegetation within the project site and may increase habitat function within riparian habitat. Although tree removal is not anticipated to be needed for trail construction, the grading of trails would result in ground disturbance and could result in minor vegetation removal within the bank of the Russian River, which is not anticipated to be a substantial effect on riparian habitat. However, due to the location of the trail construction below the top of the bank of the river, Regional Parks would be required to file a Notice of Streambed Alteration under Section 1602 of the CFGC.

The potential loss of Torrey's melic grass grassland due to project construction would be a **potentially significant** impact.

Mitigation Measures

Mitigation Measure BIO-7: Minimize Impacts to Sensitive Natural Communities

The following measures shall be implemented to avoid, minimize, or compensate for the potential loss of Torrey's melic grass grassland:

- ▶ A qualified biologist will map Torrey's melic grass grassland within the project site. If Torrey's melic grass grassland is not located within the disturbance footprint, the perimeter of the habitat will be flagged and avoided during project construction, and no further action regarding this habitat type is needed. If Torrey's melic grass grassland is located within the disturbance footprint of the project and would be permanently removed, compensatory mitigation will be required as described below.
- ▶ Regional Parks shall compensate for permanent loss of Torrey's melic grass grassland at a minimum of a 2:1 ratio through the development and implementation of a Compensatory Mitigation and Monitoring Plan for restoring in-kind habitat within the project site. The plan shall include the following:
 - identification of compensatory mitigation locations within the project site;

- reference sites for comparison with compensatory mitigation sites (using performance and success criteria) to document success;
- monitoring protocols, including schedule and annual report requirements (compensatory sites shall be monitored for a minimum of 5 years from completion of mitigation, or until the success criteria identified in the approved mitigation plan have been met);
- ecological performance standards, based on the best available science and including specifications for native plant densities, species composition, and survivorship; at a minimum, compensatory mitigation planting sites must achieve 80 percent survival of planted vegetation by the end of the five-year maintenance and monitoring period or dead and dying vegetation shall be replaced and monitoring continued until 80 percent survivorship is achieved;
- corrective measures if performance standards are not met; and
- responsible parties for receiving and reviewing reports and for verifying success or prescribing implementation or corrective actions.

Significance after Mitigation

Mitigation Measure BIO-2a and Mitigation Measure BIO-7 would minimize adverse effects on Torrey's melic grass grassland from the implementation of the proposed project by conducting worker awareness training, avoiding Torrey's melic grass grassland if possible, and providing compensatory mitigation for loss and disturbance of Torrey's melic grass grassland either through mitigation banking or on-site restoration at a ratio of 2:1. Therefore, with the implementation of Mitigation Measure BIO-2a and Mitigation Measure BIO-7, the impact to Torrey's melic grass grassland would be **less than significant with mitigation incorporated**.

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?

Less than significant with mitigation incorporated. The project site contains a traditional navigable water of the US (the Russian River) and several potentially jurisdictional waters of the state and waters of the US (Appendix B).

The project would not occur below the OHWM of the Russian River; therefore, the project would not result in dredging, fill, or other direct impacts to the Russian River itself. While there are potentially jurisdictional wetlands within the project area, these wetlands are outside of the project footprint and would not be subject to dredging, fill, or other direct impacts.

Ground-disturbing activities for project construction that are conducted during the wet season could result in erosion, sedimentation, and runoff, which could adversely affect the Russian River. Installation of temporary erosion control best management practices (BMPs) (e.g., waddles, silt fencing) would help to prevent contaminated runoff from project construction above the top of the bank of the Russian River from reaching the river. However, portions of the project (e.g., trails, invasive plant removal) would occur below the top of the bank of the Russian River (Figures 2-3 and 2-5). While the proposed trails below the top of the bank of the Russian River would occur partially within the footprint of existing informal trails and would resolve current erosion issues with these trails, construction of these features during the wet season could result in contaminated runoff and sediment flowing into the Russian River, due to the steep slope of the river bank and the close proximity to the river. This contaminated runoff and sediment would have a potentially substantial negative effect on the Russian River, which would constitute a **potentially significant** impact.

Mitigation Measures

Mitigation Measure BIO-1: Avoid and Minimize Runoff from Trail Construction on the Bank of the Russian River

Significance after Mitigation

Mitigation Measures BIO-1 would avoid and minimize adverse effects on state or federally protected wetlands from the implementation of the proposed project by suspending ground-disturbing activities below the top of the bank of the

Russian River when it is raining or soils are saturated. This would prevent construction-related erosion, sedimentation, and construction debris from entering stormwater and flowing into the Russian River. Therefore, with the implementation of Mitigation Measure BIO-1, the impact to state or federally protected wetlands would be **less than significant with mitigation incorporated**.

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?

Less than significant. The project site is located within a wildlife linkage that crosses the Russian River (Conservation Lands Network 2021); however, no nursery sites, such as deer fawning areas or rookeries for wading birds, have been identified in the project site (Appendix B). The area is currently used by recreationists accessing the river and any additional recreation use or access associated with the project would not impede use of the project site for wildlife movement. Also, the project would not place any project features within the Russian River that would pose a barrier to fish passage. The proposed connector path, trails, parking areas, and vault toilets would not create any substantial physical barriers to wildlife movement. The construction of these project features may have a temporary impact on wildlife movement due to the noise produced by heavy mechanical equipment and powered hand tools; however, construction would be limited to daytime hours, between 7:00 a.m. and 5:00 p.m., which would avoid the early evening through early morning hours when terrestrial wildlife (e.g., mule deer) is most active. For these reasons, the impact on the movement of native wildlife, migratory corridors, or nursery sites would be **less than significant**.

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

Less than significant. The project may remove up to 20 trees located along the proposed connector path adjacent to Geysers Road; however, the alignment of the connector path would prioritize tree preservation such that actual tree removal would likely be less. The Sonoma County Tree Protection Ordinance (Section 26-88-010[m]) requires the protection of trees greater than 9-inches diameter at breast height of protected species. Protected species are defined as the following: big leaf maple (*Acer macrophyllum*), black oak (*Quercus kelloggii*), blue oak (*quercus douglassi*), coast live oak (*Quercus agrifolia*), interior live oak (*Quercus wislizenii*), madrone (*Arbutus menziesii*), oracle oak (*Quercus morehus*), Oregon oak (*Quercus Garryana*), redwood (*Sequoia sempervirens*), valley oak (*Quercus lobata*), California bay (*Umbellularia californica*), and their hybrids (Section 25- 2 Definitions). The Sonoma County Code of Ordinances also includes special protections for heritage or landmark trees (Section 26D). If the construction of the connector path cannot avoid removal of protected, heritage, or landmark trees, Regional Parks would be required to plant replacement trees of the same species or pay an in-lieu fee as described in the Code of Ordinances (Section 26-88-010[m]). In addition, measures to minimize impacts to any protected trees within the project site are required, including delineation of a protected perimeter, restrictions on changes of ground level within the driplines of retained trees, and restrictions on storage of chemicals within the dripline. Regional Parks would comply with all provisions of the Sonoma County Tree Protection Ordinance including measures to minimize impacts and compensate for tree removal; therefore, this impact would be **less than significant**.

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?

No impact. The project site is not located within or adjacent to an area covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (Appendix B). In addition, the project would not result in a substantial effect on movement corridors that may be used by species that connect the area of any adopted or approved plan (see criterion [d]). Therefore, the project would have no conflict with any adopted or approved plan and there would be **no impact**.

3.9 CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. Cultural Resources.				
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Substantially disturb human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

3.9.1 Environmental Setting

DEFINITIONS

Cultural resources include districts, sites, buildings, structures, or objects generally older than 50 years and considered to be important to a culture, subculture, or community for scientific, traditional, religious, or other reasons. They include archaeological resources and historic built or architectural resources. Archaeological resources are locations where human activity has measurably altered the earth or left deposits of precontact or historic-era physical remains (e.g., stone tools, bottles, former roads, house foundations). Built environment (or architectural) resources include standing buildings (e.g., houses, barns, outbuildings, cabins) and intact structures (e.g., dams, bridges, roads, districts) that are 50 years or older.

ARCHAEOLOGICAL AND HISTORIC RESOURCE SETTING

An Archaeological Survey Report was prepared for the project by Alta Archaeological Consulting in 2020 (Alta Archaeological 2020) and provides the basis for the cultural resource setting described below.

Native American Precontact Setting

The earliest documented human occupation in California, dating to the Paleo-Indian Period (12000 – 8000 before present [BP]), was a time of variable climate, rising sea levels, and other broad scale environmental change. Archaeological sites dating to the Paleo-Indian Period are rare and few sites dating to this period have been identified in Northern California. The Paleo-Indian Period is recognized locally as the Post Pattern (Alta Archaeological 2020).

With the more stable climate of the long Archaic period (8000 – 1500 BP), people gradually became more sedentary, new groups entered the area, and regional cultural distinctions developed. The Archaic has been divided into three sub-periods (Lower, Middle, and Upper), based on changes in sociopolitical complexity, trade networks, populations, and the introduction of new artifact types. Many of the archaeological sites in the northern Coast Ranges were first used in the Middle and Upper Archaic, when populations were increasing and groups moved into new areas to exploit a more diverse range of resources. By the Upper Archaic period beginning around 500 BC, mobility decreased as the region's inhabitants became more sedentary. Subsistence strategies shifted to focus on intensive processing and storage. Numerous small villages and the beginnings of a more complex society and economy characterize the end of this period.

During the Emergent Period (1500 BP - colonization), social complexity further developed. Archaeological sites dating to this period are common throughout the northern Coast Ranges and include sites of ritual significance, such as rock art; small resource-processing areas marked by stone-tool manufacturing debris (debitage) and flaked-stone tools or milling equipment (such as mortars and pestles); or moderate- to large-sized occupation sites marked by midden soils, dietary bone and shell, and a diversity of artifacts (Alta Archaeological 2020).

Historic Era Overview

Anglo Americans came to northern Sonoma County in the early 1850s. Cloverdale and the project region were originally in the northwestern corner of the Rancho Rincon de Musalacon. The rancho was initially granted to Francisco Berryessa by Governor Pio Pico in 1846. Berryessa then sold this property to Johnson Horrell and his partners in 1851. Cloverdale was originally known as Markleville for R. B. Markle, who purchased land from Johnson, and owned an early stagecoach stop in Cloverdale. The Cloverdale post office was established in 1857. One of the earliest railroads in Sonoma County was the Petaluma and Haystack railroad. The railroad started construction in 1862 and was the precursor to the Sonoma and Marin Railroad built in 1876. In the meantime, the San Francisco and North Pacific Railroad was started in Petaluma in 1868 and reached Cloverdale by 1872. Another line was built from Cloverdale to Ukiah starting in 1886 and finished in 1888. This line was originally owned by the Cloverdale and Ukiah Railroad Company and was sold to the San Francisco and North Pacific Railway Company. This section of rail soon became incorporated into the Northwestern Pacific Railroad. After the completion of the railroad, Cloverdale became a trading hub and the population grew rapidly. The railroads were built to support hauling lumber, then freight, and finally as part of the burgeoning tourism industry. The railroad continued in operation throughout the Great Depression, surviving until 1958 (Alta Archaeological 2020).

The project site is within the property of the historic-era Preston religious colony. This colony was established by Emily Preston, formerly Burke. Throughout the 1880s, the population exponentially increased, and the burgeoning religious colony apexed around 1895. The community of Preston grew to include a commercial district on the west side of the Russian River. Preston businesses consisted in part of a store, a post office, a railroad station, a mill, a mineral spring water works, and many residences. The colony benefitted from its proximity to the Northwestern Pacific Railroad as well as the presence of the original route of US 101, originally a county road, which crossed the Russian River and followed the eastern bank of the river through the colony. After Emily Preston's death, the colony began to experience a slow decline into the 1930s. The colony property suffered damage from a number of fires after its closure. In June 1988, a large fire destroyed most of the original colony buildings. The realignment of US 101 in September of that year caused the relocation of several houses on the west bank of the river (Alta Archaeological 2020).

RECORDS SEARCH

On June 25, 2020, Alta Archaeological requested a records search (File Number 19-2342) at the Northwest Information Center (NWIC) located on the campus of Sonoma State University. The NWIC, an affiliate of the State of California Office of Historic Preservation, is the official state repository of archaeological and historical records and reports for an 18-county area that includes Sonoma County. The records search request included a 0.50-mile radius of the project site. Sources consulted include archaeological site and survey base maps, survey reports, site records, and historic General Land Office (GLO) maps. Review of historic registers and inventories indicate that no historical landmarks or points of interest are present in the project site, and no California Register listed or eligible properties are located within 0.50-mile of the project site.

Review of archaeological site and survey maps revealed that approximately 80 percent of the 0.50-mile records search radius has been previously surveyed and 100 percent of the project site has been previously surveyed. Although no cultural resources are documented to occur within the project site, six cultural resources are documented within 0.50-mile of the project site, which are summarized in Table 3.9-1 below.

Table 3.9-1 Summary of Documented Cultural Resources within Search Radius

Primary Number	Age	Description
P-23-001749	Unknown	DOT-04-MEN-101-01-84 (surface concentration of river cobbles)
P-23-005642	Precontact	Magnesite quarry
P-49-002299	Protohistoric, Historic	Preston Ranch (complex of buildings and features dating to between the 1870s and 1930s)
P-49-002834	Historic	Northwestern Pacific Railroad
P-49-003806	Historic	Preston Lumber Company (industrial complex)
C-90	Precontact	Midden

Source: Alta Archaeological 2020.

FIELD INVESTIGATION

Alta Archaeological staff archaeologists conducted a field survey of the project site on August 3, 2020. Ground-surface visibility was fair near banks at about 25 percent, due to dense grasses and leaf litter. Visibility on sandbars and in dirt pullouts was excellent, between 90 to 100 percent. The entirety of the project site was surveyed, totaling approximately 25 acres of land. The project site was surveyed using intensive survey coverage with transects no greater than 10-meter intervals.

3.9.2 Discussion

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No impact. No built environment historical resources have been identified within the project site (Alta Archaeological 2020). Therefore, the project would not cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5 and **no impact** would occur.

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

Less than significant with mitigation incorporated. Although neither the NWIC records search nor the pedestrian survey revealed any archaeological sites within the project site, archaeological sites have been documented within the NWIC search radius (Alta Archaeological 2020). Additionally, the project is in a region that has been inhabited since 8000 BP, and therefore, it is possible that unrecorded precontact archaeological materials may be located within the project site (Alta Archaeological 2020). Impacts to undiscovered archaeological resources could occur during ground-disturbing construction activities and from use of heavy equipment, which would be a **potentially significant** impact. The following mitigation measure would be implemented to reduce the impact to unknown archaeological resources.

Mitigation Measures

Mitigation Measure CUL-1: Implement Measures to Protect Cultural and Tribal Cultural Resources

In the event that a precontact archaeological site (including midden soil, chipped stone, bone, or shell), or historic period archaeological site (such as concentrated deposits of bottles, amethyst glass, or historic refuse) are found during project construction, all ground-disturbing activity within 50 feet of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. Regional Parks will be notified of the potential find and a qualified archaeologist shall be retained to investigate its significance. If the find is a precontact archaeological site, the culturally affiliated Native American tribe shall be immediately notified. The tribal representative(s), in consultation with the archaeologist, shall determine if the find is a significant tribal cultural resource (pursuant to Public Resources

Code [PRC] Section 21074). The tribal representative will make recommendations for treatment, as necessary. Culturally appropriate treatment may be preservation in place, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, or returning objects to a location within the project vicinity where they will not be subject to future impacts.

Any previously undiscovered resources found during construction will be recorded on appropriate California Department of Parks and Recreation 523 forms and evaluated for significance under all applicable regulatory criteria. If the archaeologist determines that the find does not meet the California Register of Historical Resources (CRHR) standards of significance for cultural resources, construction may proceed. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), the archaeologist shall work with the Regional Parks to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. If artifacts are recovered from significant historic archaeological resources, they shall be housed at a qualified curation facility. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, and analyzes and interprets the results.

If any human remains are exposed during construction, they shall be treated in accordance with the California Health and Safety Code and California PRC Sections 5097.94 and 5097.98, in consultation with the Native American Heritage Commission (NAHC).

Significance after Mitigation

Implementation of Mitigation Measure CUL-1 would reduce impacts to any unknown archaeological resources discovered during construction. Per Mitigation Measure CUL-1, if a precontact archaeological site or a historic-period archaeological site is uncovered during construction activities, Regional Parks would be required to halt all ground-disturbing activity within 50 feet of the discovery until a qualified archaeologist can assess the find. Depending on the significance and type of find, specific actions would be implemented, which could include notification of the culturally affiliated tribe and resource documentation using the appropriate California Department of Parks and Recreation 523 forms. Therefore, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5, and impact would be clearly reduced to **less than significant with mitigation incorporated**.

c) Substantially disturb human remains, including those interred outside of formal cemeteries?

Less than significant with mitigation incorporated. As described under criterion b) above, the project region has been inhabited since 8000 BP. Therefore, undiscovered human remains could be located within the project site. The project includes grading and other ground-disturbing activities during construction, which could encounter human remains, if present in the project site. However, Mitigation Measure CUL-1 would be implemented to avoid and minimize impacts to unknown cultural resources, including human remains. Mitigation Measure CUL-1 requires that any discovered human remains be treated in accordance with the California Health and Safety Code and PRC Sections 5097.94 and 5097.98, in consultation with the NAHC. The California Health and Safety Code and PRC Sections 5097.94 and 5097.98 require the implementation of procedures to avoid and minimize the disturbance of human remains and the appropriate treatment of any remains determined to be Native American that are discovered, including notifying the NAHC within 24 hours and adhering to the NAHC's guidelines regarding the treatment and disposition of the remains. If the coroner finds that the human remains are Native American, the NAHC-designated most likely descendant (MLD) shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments, if present, are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in PRC Section 5097.94. Implementation of Mitigation Measure CUL-1 would limit disturbance to human remains, including those interred outside of formal cemeteries, and the impact would clearly be **less than significant with mitigation incorporated**.

3.10 ENERGY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

3.10.1 Environmental Setting

California relies on a regional power system composed of a diverse mix of natural gas, petroleum, renewable, hydroelectric, and nuclear generation resources:

- ▶ **Natural gas:** About 60 percent of California households use natural gas for home heating, and about half of California’s utility-scale net electricity generation is fueled by natural gas (EIA 2024).
- ▶ **Petroleum:** Petroleum products (gasoline, diesel, jet fuel), which are consumed almost exclusively by the transportation sector, account for almost 99 percent of the energy used in California by the transportation sector, with the rest provided by ethanol, natural gas, and electricity (Bureau of Transportation Statistics 2017). Between January 2007 and May 2016, an average of approximately 672 billion gallons of gasoline were purchased in California (California State Board of Equalization 2016). Gasoline and diesel fuel sold in California for motor vehicles is refined in California to meet specific formulations required by the CARB (EIA 2024).
- ▶ **Electricity and renewables:** The California Energy Commission (CEC) estimates that 39 percent of California’s retail electricity sales in 2021 was provided by Renewable Portfolio Standard (RPS)-eligible renewable resources (EIA 2024).
- ▶ **Alternative fuels:** Conventional gasoline and diesel may be replaced (depending on the capability of the vehicle) with many alternative transportation fuels (e.g., biodiesel, hydrogen, electricity). Use of alternative fuels is encouraged through various statewide regulations and plans (e.g., Low Carbon Fuel Standard, 2022 Scoping Plan).

ENERGY FACILITIES AND SERVICES IN THE COUNTY

The County of Sonoma, the Sonoma County Water Agency, and the County of Mendocino are members of Sonoma Clean Power Authority (SCPA), along with participating member municipalities including of Cloverdale, Cotati, Fort Bragg, Petaluma, Point Arena, Rohnert Park, Santa Rosa, Sebastopol, Sonoma, and Willits. The SCPA serves as the Community Choice Aggregation (CCA) for its member jurisdictions (SCP 2016). The SCPA formed the Sonoma Clean Power program (SCP) CCA, which first began serving customers in May 2014. The SCP program works in partnership with Pacific Gas & Electric (PG&E) to deliver greenhouse gas (GHG)-efficient electricity to customers within its member jurisdictions. Consistent with state law, all electricity customers in the unincorporated Sonoma County were automatically enrolled in SCP; however, customers can choose to opt out and be served by PG&E. In 2020, approximately 93 percent of all power supplied by SCP was carbon-free (SCP 2020). PG&E supplies natural gas service to the County through state-regulated public utility contacts.

REGULATORY SETTING

Federal Regulations

The Energy Policy and Conservation Act of 1975 established nationwide fuel economy standards to conserve oil. Under this act, the National Highway Traffic and Safety Administration is responsible for revising fuel economy standards and establishing new vehicle economy standards. The Corporate Average Fuel Economy (CAFE) program was established to determine vehicle manufacturer compliance with the government's fuel economy standards. Three Energy Policy Acts have been passed, in 1992, 2005, and 2007, to reduce dependence on foreign petroleum, provide tax incentives for the development of alternative fuels, and support energy conservation.

State Regulations

California's 2022 Climate Change Scoping Plan

CARB adopted the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) on December 16, 2022, which traces the State's pathway to achieve its carbon neutrality and an 85 percent reduction in 1990 emissions goal by 2045 using a combined top-down, bottom-up approach under various scenarios. It identifies the reductions needed by each GHG emission sector (e.g., transportation [including off-road mobile source emissions], industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste) to achieve these goals (CARB 2022).

Warren-Alquist Act

The 1974 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the CEC. The act was created as a response to the state legislature's review of studies projecting an increase in statewide energy demand, which would potentially encourage the development of power plants in environmentally sensitive areas. The act introduced state policy for siting power plants to reduce potential environmental impacts and sought to reduce demand for these facilities by directing CEC to develop statewide energy conservation measures to reduce wasteful, inefficient, and unnecessary uses of energy. Conservation measures recommended establishing design standards for energy conservation in buildings that ultimately resulted in the creation of the Title 24 Building Energy Efficiency Standards (California Energy Code), which have been updated regularly and remain in effect today. The act additionally directed CEC to cooperate with the Office of Planning and Research, the California Natural Resources Agency, and other interested parties in ensuring that a discussion of wasteful, inefficient, and unnecessary consumption of energy is included in all environmental impact reports required on local projects.

State of California Energy Action Plan

CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The current plan is the 2003 California Energy Action Plan (2008 update). The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs, and encouragement of urban design that reduces vehicle miles traveled (VMT) and accommodates pedestrian and bicycle access.

Transportation-Related Regulations

The EPA and National Highway Traffic Safety Administration (NHTSA) have issued rules to reduce GHG emissions and improve standards for light-duty vehicles for model years 2017 and beyond (77 *Federal Register* 62624). NHTSA's CAFE standards have been enacted under the Energy Policy and Conservation Act since 1978. This national program requires automobile manufacturers to build a single light-duty national fleet that meets all requirements under both federal programs and the standards of California and other states. The purpose of this program is to increase fuel economy and limit vehicle emissions, including carbon dioxide (CO₂) emissions, of cars and light-duty trucks (77 *Federal Register* 62630).

The Safer Affordable Fuel-Efficient Vehicles Rule, promulgated by NHTSA and EPA in 2020, set new CAFE standards for passenger cars and light-duty trucks, model years 2021–2026 (NHTSA and EPA 2020). This rule also revoked a waiver granted by EPA to the State of California under Section 209 of the CAA to enforce more stringent emission standards for motor vehicles than those required by EPA for the explicit purpose of GHG reduction and, indirectly, CAP and ozone precursor emission reduction (NHTSA and EPA 2020). Various regulatory and planning efforts are aimed at reducing dependency on fossil fuels, increasing the use of alternative fuels, and improving California's vehicle fleet. SB 375 aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. CARB, in consultation with the metropolitan planning organizations, provides each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in their respective regions for 2020 and 2035.

Under AB 2076 (Chapter 936, Statutes of 2000), CEC and CARB prepared and adopted a joint agency report in 2003, *Reducing California's Petroleum Dependence*. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT (CEC and CARB 2003).

AB 1007 (Chapter 371, Statutes of 2005) required CEC to prepare the State Alternative Fuels Plan to increase the use of alternative fuels in California.

In January 2012, CARB approved the Advanced Clean Cars program, which combines the control of GHG emissions and CAPs, as well as requirements for greater numbers of zero-emission vehicles, into a single package of standards for vehicle model years 2017–2025. The program's zero-emission vehicle regulation requires battery, fuel cell, and/or plug-in hybrid electric vehicles to account for up to 15 percent of California's new vehicle sales by 2025.

Local Regulations

Sonoma County

Sonoma County adopted the Climate Change Action Resolution Number 18-0166 (resolution) in May 2018. The resolution was developed in part with the Regional Climate Action Plan 2020 and Beyond project to develop measures specific to Sonoma County that will result in the reduction of GHGs (Sonoma County 2018c). As outlined in the resolution, Sonoma County will pursue local actions that support GHG reduction goals including increasing building energy efficiency, reducing water consumption, increasing carbon sequestration, promoting sustainable agriculture, etc. The resolution also indicates Sonoma County's commitment to implement these local actions by committing to the countywide target to reduce GHG emissions by 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

3.10.2 Discussion

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

Less than significant. The proposed project would increase energy use from existing conditions from both construction and operational activities.

Construction

Energy would be required to operate and maintain construction equipment and transport construction materials. The one-time energy expenditure required to construct the infrastructure associated with the project would be nonrecoverable. Energy consumption would result from operation of off-road construction equipment and on-road vehicle trips associated with commutes by construction workers and vendor and haul trucks trips. Table 3.10-1 summarizes the level of energy consumption associated with the construction of the project. The analysis conservatively assumes a 16-month construction period. An estimated 2,509 gallons of gasoline and 37,909 gallons of diesel fuel would be used during construction of the project (see Appendix A).

Table 3.10-1 Construction Energy Consumption

Diesel (Gallons)	Gasoline (Gallons)
37,909	2,509

Notes: Gasoline gallons include on-road gallons from worker trips. Diesel gallons include off-road equipment and on-road gallons from vendor and hauling trips.

Source: Appendix A (calculations by Ascent in 2024).

The energy needs for project construction would be temporary and are not anticipated to require additional capacity or increase peak or base period demands for electricity and other forms of energy. Associated energy consumption would be typical of that associated with recreational projects of this size in a rural setting. Although the one-time energy expenditure required to construct the project would be nonrecoverable, it would not be consumed in a wasteful, inefficient, or unnecessary manner. In addition, the project would be beneficial by providing a new regional recreational resource.

Operational

The project would result in one electrical hook up that would tie into a nearby power line to provide electricity to the site host area at Access Area 3. It was assumed the site host would be operational during the summer season and utilize the hook up for a majority of the day and night, resulting in the consumption of up to 17 megawatts of electricity annually. The project would not require any other sources of electricity or natural gas during operations, therefore operational energy would be minimal.

Increased fuel use would occur as a result of increased vehicle-based visitation to the project site. Table 3.10-2 summarizes the levels of energy consumption associated with the operation of the project for the first full year of operations. Fuel consumption associated with project-related vehicle trips would not be wasteful, inefficient, or unnecessary because the project would provide a high-quality public access and recreation resource for the region. In addition, this increase in energy use would not be substantial given that there would be no other permanent ongoing energy use as a result of the project, such as facilities requiring electricity or natural gas.

Table 3.10-2 Operational Energy Consumption

Energy Type	Energy Consumption	Units
Gasoline	1,085	gal/year
Diesel	6	gal/year

Notes: gal/year = gallons per year.

Source: Appendix A (calculations by Ascent in 2024).

Summary

Although the project would result in increased energy use that is nonrecoverable, for the reasons described above, it would not be wasteful, inefficient, or unnecessary energy consumption. Therefore, this impact would be **less than significant**.

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

No impact. The County’s Climate Change Resolution includes various energy use and conservation goals to promote a sustainable future through local actions that save energy, reduce fossil fuel use, and promote green buildings. The County’s goals towards energy conservation, renewable energy, and land conservation include the following:

- ▶ Increase building energy efficiency.
- ▶ Increase renewable energy use.
- ▶ Switch equipment from fossil fuel to electricity.
- ▶ Reduce travel demand through focused growth.

- ▶ Encourage a shift toward low-carbon transportation options.
- ▶ Increase vehicle and equipment fuel efficiency.
- ▶ Encourage a shift toward low-carbon fuels in vehicles and equipment.
- ▶ Reduce idling.
- ▶ Protect and enhance the value of open and working lands.

Because the project includes the construction of minor infrastructure (e.g., parking, trails, and picnic areas), the policies on energy conservation and efficiency in buildings do not apply. As discussed in Chapter 2, "Project Description," the project involves the construction of new public access features within an undeveloped open space area, including new trails to support public access and low intensity recreation. Therefore, the project would not conflict with or obstruct the County's Climate Change Resolution goals outlined above, and there would be **no impact**.

3.11 GEOLOGY AND SOILS

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

3.11.1 Environmental Setting

GEOLOGIC CONDITIONS

The project site lies within the Coast Range geomorphic province of Northern California, a region characterized by subparallel north to northwest-oriented mountain ranges and intermountain alluvial valleys. Geologic units within the region include Jurassic-Cretaceous (145 million year) Franciscan Complex, a heterogeneous mix of igneous, sedimentary, and metamorphic rocks unconformably overlain by Quaternary alluvium and colluvium. Prevalent bedrock in the area

consists of the Jurassic-Cretaceous Franciscan Complex, originally deposited in a marine environment, and the Sonoma Volcanics group. Extensive folding and faulting during the late Cretaceous through early Tertiary geologic time created complex geologic conditions that underlie the highly varied topography in the area. In valleys, the bedrock is covered by alluvial deposits (Appendix C).

SOILS

The project site is mapped as being underlain by both younger alluvial soils consisting of poorly sorted silt, sand, and gravel, and Franciscan graywacke (Appendix C). The alluvial soils are fluvial soils that have been deposited by the erosional and depositional forces of the Russian River. The alluvial deposits are underlain by the Franciscan Complex which is comprised of Cretaceous-Jurassic sandstone with smaller amounts of shale, chert, limestone, and conglomerate. The Franciscan greywacke are characterized as thick-bedded lithic sandstone and occasional conglomerate (Appendix C).

According to US Geological Survey (USGS) data, soils beneath the project site are primarily loams classified as having moderate infiltration rates, deep and moderately deep, moderately well and well drained soils with moderately coarse textures (USGS 2009). Two distinctive soil classes occur in the project site where Geysers Road cuts further into the hillside to the east. These are the Boomer series gravelly loam and the Sobrante series silt loam (USGS 2009, DWR 2014). These are soils formed from the weathering igneous and metamorphic rocks, and often represent the transition between major landforms. The Boomer and Sobrante soil series both are underlain by greenstone and metamorphosed rock and are considered to be stable soils (USGS 2009, NRCS 2022). In addition, because the project site runs along the bank of the Russian River, a large portion of local soils consist of river wash.

GEOLOGIC HAZARDS

Subsidence

Land subsidence is the sinking of land surface, which can occur as groundwater is extracted from certain types of rocks, such as fine-grained sediments. If too much water is withdrawn, it no longer fills the “pore space” between the rocks, and the rocks collapse in on themselves (USGS 2009). Healthy aquifer systems also support structural integrity through the avoidance of land subsidence. Subsidence of the land can damage vital infrastructure, such as wells, sewers, roads, and bridges.

The project site is underlain by the Alexander Valley Groundwater Basin, which occupies a structural depression in the Coast Ranges north of the San Francisco Bay (USGS 2009). The project site is locally bounded by low hills consisting of unconsolidated water-yielding sediments. The Russian River flows south along the entire length of the basin and is joined by Big Sulphur Creek, a principal tributary, at the north end of Cloverdale Valley. Precipitation ranges from 40 to 44 inches over the entire Alexander Valley Groundwater Basin (DWR 1983).

Since the early 2000s, increases in imported surface water from the Russian River and water conservation have greatly reduced land subsidence related to groundwater use in the County (Sonoma Water 2020). Groundwater levels have recovered, which coincide with increased water conservation, reduced groundwater pumping, and increased deliveries of Russian River supplies by Sonoma Water (Sonoma Water 2020).

Expansive Soils

Expansive soils are typically composed of clay with a swelling and shrinking potential when it comes into contact with water (Asuri and Keshavamurthy 2016). Expansive soils are deposited in a loose, highly porous state, then harden and remain dry after deposition. Upon contact with moisture, the weak cementation between the loose soil particles softens and can result in settlement or collapse. Soils throughout the project site are predominantly loam composition, characterized by a low percentage of clay, and therefore, would not be expansive (USGS 2024a). In addition, geotechnical investigations conducted at the project site indicated that expansive soils are limited at the project site (MPEG 2022).

Landslides

A landslide is the movement of a mass of rock, debris, or earth down a slope. The term "landslide" encompasses five modes of slope movement: falls, topples, slides, spreads, and flows. These are further subdivided by the type of geologic material (bedrock, debris, or earth). Debris flows (commonly referred to as mudflows or mudslides) and rock falls are examples of common landslide types (USGS 2024). Portions of the project site are characterized as having Very High Landslide Susceptibility (Sonoma County 2016a). During geotechnical investigations, evidence indicative of significant recent landslide activity, such as fresh scarps or tension cracks, was not observed in the immediate project area. However, tension cracks were observed in the roadway above the project area. The risk of slope instability is characterized as moderate to high, and generally higher during the winter months and seismic events (MPEG 2022).

PRIMARY SEISMIC HAZARDS

The region surrounding the project site has historically experienced a high level of seismic activity (Appendix C). There are no Alquist-Priolo zones located in the project site; however, the project site is located near several faults recognized as active by the state of California and zoned pursuant to the Alquist-Priolo Act. The Maacama Fault runs west of US 101 from north of Mark West Springs to Cloverdale and is the closest fault to the project site, located approximately 3.5 miles southeast (Sonoma County 2016b). The Konocti Bay Fault runs through Kelseyville and is about 13.5 miles northeast from the project site. The Rodgers Creek Fault also runs west of US 101 through Santa Rosa and is located approximately 20 miles south of proposed project. Due to their proximity, these faults have the potential to generate moderate to strong earthquake-induced ground shaking within the project site (Sonoma County 2016b).

SECONDARY SEISMIC HAZARDS

When strong ground shaking results from a nearby or distant earthquake, several secondary seismic hazards can occur. These seismic hazards can include liquefaction and soil instability. Seismically induced flooding from tsunamis, seiche, and dam failure are discussed in Section 3.10, "Hydrology and Water Quality." The project site is classified as having earthquake vulnerability, which considers a sites' potential for seismic shaking, liquefaction, and soils that have the potential to become highly or easily saturated (Sonoma County 2011a). However, the project site is not designated as being moderately or highly susceptible to liquefaction (Sonoma County 2016b).

3.11.2 Discussion

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)**

No impact. No delineated Alquist-Priolo Earthquake Fault Zones are within or immediately adjacent to the project site. The Maacama Fault is the closest fault to the project site and is located approximately 3.5 miles southeast of the project site. Because the project site is not located on or immediately adjacent to an active fault, there would be no risk of loss injury or death involving rupture of a known earthquake fault and **no impact** would occur.

- ii) **Strong seismic ground shaking?**

Less than significant. While the project site is not within or immediately adjacent to an active Alquist-Priolo Earthquake Fault Zones, there are several faults located close enough the project site that they could cause moderate to strong seismic ground shaking in the event of an earthquake.

The project may result in increased visitation to the area; however, no habitable structures would be developed. New and/or improved structures and amenities would be limited to parking areas, picnic areas, trail and path improvements, and four vault toilets. Of the new structures and amenities proposed, only the four vault toilets would be enclosed with overhead structures; the public's primary uses of the project site would be outdoor activities. Regional Parks would obtain building permits for the new vault toilets and all structures and foundations would conform to the latest seismic provisions of the California Building Code. If strong ground shaking were to occur at the project site, the risk of loss, injury, or death would be low due to the limited quantity of new structures on-site presenting associated fall or collapse hazards.

Given the primarily outdoor use of the project site, lack of overhead structures and buildings, and project compliance with Sonoma County Building Permit requirements and the California Building Code, the project would have a **less-than-significant** impact related to risk of loss, injury, or death from strong seismic ground shaking.

iii) Seismic-related ground failure, including liquefaction?

Less than significant. The project site is within a region susceptible to strong seismic ground shaking due to earthquakes on nearby faults. As discussed above under "Secondary Seismic Hazards," project site soils do not have a high risk of liquefaction. In addition, as discussed above under criterion a) (ii), visitors to the project site would be primarily outdoors and the quantity and size of new overhead structures is minimal. Therefore, the impact to people or structures relating to the loss, injury, or death from seismic related ground failure, including liquefaction, would be **less than significant**.

iv) Landslides?

Less than significant. Steep slopes are located between Geysers Road and the Russian River within the project site, which, due to their tendency to promote soil instability increase the likelihood of mass movement during periods of heavy rainfall or seismic activity. Portions of the project site are characterized as having moderate to high landslide susceptibility (Sonoma County 2016a). However, the construction and operation of the proposed project features would not substantially increase the risk of a landslide due to the low impact nature of the project and low intensity recreation that would occur. All new structures and foundations would be built in conformance with the latest seismic provisions of the California Building Code requirements. In addition, the project site is currently used by the public for recreation and improvements to existing trails would be made to increase overall stabilization and provide erosion control. Therefore, the project would not substantially increase risks of injury, death, or loss from landslides and the impact would be **less than significant**.

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

Less than significant. Construction activities could cause soil erosion and the loss of topsoil through grading and excavations. Areas where project features would be built would be graded and smoothed to prepare for material laydown, such as concrete pads for vault toilets and to install the new connector path, and trails would be graded or regraded in each of the access areas. All of these activities have the potential to result in soil erosion and loss of topsoil. However, BMPs consistent with the requirements of the SWPPP for the project would be required prior to ground-disturbing construction activities to reduce soil erosion and runoff. These BMPs would include the use of perimeter siltation fencing and wattles to prevent off-site erosion and sedimentation and the use of erosion control mats to prevent exposed soils from being displaced by rain or wind and entering the Russian River. In addition, total grading and excavation associated with the project would be relatively minor and temporary (i.e., up to 2.25 acres of ground disturbance over the 25-acre project site), lasting only the duration of construction. Furthermore, the project site is currently used by the public for recreation and improvements to existing trails would be made to increase overall stabilization and provide erosion control. Therefore, the project would not result in substantial soil erosion or loss of topsoil and the impact would be **less than significant**.

- 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?**

Less than significant. The Boomer and Sobrante soil series beneath the project site are underlain by greenstone and metamorphosed rock, both are which are considered to be stable soils. The project involves the construction of public access features and amenities, most of which would not affect site stability (e.g., regrading trails, formalizing parking areas). Only a few new structures would be constructed, the largest of which would be four vault toilets. The vault toilet structures would be small and built on concrete pads with foundations for stability in conformance with the latest California Building Code requirements. As discussed under criterion a) (iv), portions of the project site are susceptible to landslides. However, the construction and operation of the proposed project features would not substantially increase the risk of a landslide due to the low impact nature of the project and low intensity recreation that would occur. All new structures and foundations would be built in conformance with the latest seismic provisions of the California Building Code requirements. In addition, the project site is currently used by the public for recreation and improvements to existing trails would be made to increase overall stabilization and provide erosion control. Therefore, the project would not create unstable conditions and the impact would be **less than significant**.

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

Less than significant. Foundations of buildings are typically most affected by expansive soils. Only the proposed vault toilets would require foundations and/or footings that could be affected by expansive soils. As described above under "Expansive Soils," geotechnical investigations conducted at the project site indicated that expansive soils are not considered significant at the project site (MPEG 2022). Furthermore, there would only be four small vault toilets and no other buildings are proposed. Given this, and that the project site is not known to contain or be adjacent to expansive soils, the project would not create a substantial risk to life or property due to expansive soils. Therefore, the impact would be **less than significant**.

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

Less than significant. The vault toilets that would be constructed would be non-discharging wastewater disposal units composed of underground, self-contained, watertight containers designed to hold the wastewater until it is pumped out. As described above, despite being situated in an area characterized by moderate to high landslide susceptibility, there are no known areas of potential soil instability issues such as subsidence, expansive soils, or liquefaction. As part of the building permit process, Permit Sonoma would require Regional Parks to conduct a septic site evaluation to ensure adequate support for the proposed vault toilets, and they would be built in conformance with the latest California Building Code requirements. In addition, the vault toilets would not be constructed on slopes, where landslide risks are the greatest. For the reasons described above, the impact would be **less than significant**.

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

Less than significant with mitigation incorporated. No unique geologic features would be destroyed by the proposed project, and no unique geologic features are known to occur within or adjacent to the project site. Paleontological resources and fossil bearing formations are typically found in sedimentary rock, which is formed by dirt (sand, silt, or clay) and debris that settles to the bottom of an ocean or lake and over time compresses into a rock (USGS n.d.). Since the project site is underlain by primarily metamorphosed rock, paleontological resources or sites are not expected within the project site (NRCS 2022). However, during construction of the project, deep excavations could potentially unearth unknown unique paleontological resources or sites, which could damage the resource. The deepest excavation would be associated with installation of the four vault toilets and would extend up to 8 feet below ground. Given the depth of the

excavation required to construct the vault toilets, the project could encounter paleontological resources, if present, and this would be a **potentially significant** impact.

Mitigation Measures

Mitigation Measure GEO-1: Implement Measures to Protect Paleontological Resources

In the event that a paleontological resource is uncovered during grading/excavation or other construction activities, all ground-disturbing activity within 50 feet of the discovery shall be halted immediately until a qualified paleontologist can assess the nature and significance of the find. No construction shall occur within 50 feet of the find until the qualified paleontologist has determined and implemented the appropriate salvage and treatment of the find and confirms that construction may proceed.

Significance after Mitigation

Implementation of Mitigation Measure GEO-1 would avoid and minimize impacts to unknown paleontological resources by requiring that, if a paleontological resource is uncovered during construction activities, all ground-disturbing activity within 50 feet of the discovery be halted until a qualified professional paleontologist can assess the nature and importance of the find and recommend and implement appropriate salvage and treatment. Implementation of Mitigation Measure GEO-1 would avoid and minimize project impacts to unknown paleontological resources and the impact would clearly be **less than significant with mitigation incorporated**.

3.12 GREENHOUSE GAS EMISSIONS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. Greenhouse Gas Emissions.				
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

3.12.1 Environmental Setting

Prominent GHGs contributing to the greenhouse effect are CO₂, methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. GHG emissions contributing to global climate change are attributable, in large part, to human activities associated with on-road and off-road transportation, industrial/manufacturing, electricity generation by utilities and consumption by end users, residential and commercial on-site fuel usage, and agriculture and forestry. It is “extremely likely” that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic factors together (IPCC 2014: 5).

Climate change is a global problem. GHGs are global pollutants because even local GHG emissions contribute to global impacts. GHGs have long atmospheric lifetimes (one to several thousand years) and persist in the atmosphere long enough to be dispersed around the globe. Although the lifetime of any particular GHG molecule is dependent on multiple variables and cannot be determined with any certainty, it is understood that more CO₂ is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration (IPCC 2013:467).

GREENHOUSE GAS EMISSION SOURCES AND SINKS

As discussed previously, GHG emissions are attributable in large part to human activities. CO₂ is the main byproduct of fossil fuel combustion. CH₄, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices, organic material decomposition in landfills, and the burning of forest fires (Black et al. 2017). N₂O emissions are largely attributable to agricultural practices and soil management. CO₂ sinks, or reservoirs, include vegetation and the ocean, which absorb CO₂ through sequestration and dissolution (CO₂ dissolving into the water); respectively, these are the two of the most common processes for removing CO₂ from the atmosphere.

The total GHG inventory for unincorporated Sonoma County was 3.41 million MTCO₂e in 2018, slightly below 2015 emissions levels (i.e., 3.41 million MTCO₂e), or a 13 percent emissions reduction from 1990 levels (RCPTA 2020). The most recent local GHG inventory for unincorporated Sonoma County is presented in Table 3.12-1 to provide context for the GHG emissions associated with the project.

Table 3.12-1 Unincorporated Sonoma County 2018 GHG Emissions Inventory

Sector	Percent
Building Energy	22
Livestock and Fertilizer	11
Water and Wastewater	1
Solid Waste	6
Transportation	60

Source: RCPTA 2020

REGULATORY SETTING

State Regulations

Statewide GHG Emission Targets and the Climate Change Scoping Plan

Reducing GHG emissions in California has been the focus of the State government for approximately two decades. GHG emission targets established by the State legislature include reducing statewide GHG emissions to 1990 levels by 2020 (Assembly Bill [AB] 32 of 2006) and reducing them to 40 percent below 1990 levels by 2030 (Senate Bill [SB] 32 of 2016). Executive Order S-3-05 calls for statewide GHG emissions to be reduced to 80 percent below 1990 levels by 2050. This target was superseded by AB 1279, which codifies a goal for carbon neutrality and reduce emissions by 85 percent below 1990 levels by 2045. These targets are in line with the scientifically established levels needed in the US to limit the rise in global temperature to no more than 2 degrees Celsius, the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected; these targets also pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius (UN 2015:3).

CARB adopted the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) on December 16, 2022, which traces the State's the pathway to achieve its carbon neutrality and an 85 percent reduction in 1990 emissions goal by 2045 using a combined top-down, bottom-up approach under various scenarios. It identifies the reductions needed by each GHG emission sector (e.g., transportation [including off-road mobile source emissions], industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste) to achieve these goals (CARB 2022).

Local Regulations

Air Districts

The project site is located within northern Sonoma County which is within the jurisdiction of the Northern Sonoma County Air Pollution Control District (NoSoCo Air). NoSoCo Air currently has not developed guidance for assessing GHG emissions from land use projects and instead defers to the Bay Area Air Quality Management District (BAAQMD) for GHG guidance and recommended significance criteria. BAAQMD is the primary agency responsible for addressing air quality and GHG concerns in the San Francisco Bay Area. In the 2022 CEQA Guidelines, BAAQMD's approach to developing thresholds of significance for climate impacts is to use a "fair share" approach for determining whether an individual project's GHG emissions would be cumulatively considerable. If a project would contribute its "fair share" of what is needed to achieve the State's long-term GHG reduction goals, then the lead agency can find that the project is adequately contributing to solving the problem of global climate change and that project's impact is not significant. Using this approach, BAAQMD has identified the necessary design elements required for new land use projects and plans being built today in order to achieve California's long-term climate goal of carbon neutrality by 2045. The guidelines do not identify a GHG emission threshold for construction-related emissions and the recommended design elements do not apply to this type of project. However, the 2017 BAAQMD CEQA Guidelines outline advisory thresholds for stationary source and land use development projects. The mass emissions threshold for stationary source projects is 10,000 metric tons per year of carbon dioxide equivalent (CO₂e). The advisory threshold for land use development

projects is 1,100 metric tons per year of CO₂e. In addition, BAAQMD recommends that GHG emissions from construction be quantified and disclosed, and that a determination regarding the significance of these GHG emissions be made with respect to whether a project is consistent with statewide GHG emission reduction goals.

Sonoma County

The Sonoma County Regional Climate Protection Authority (RCPA) established a baseline communitywide GHG inventory for 2010 and a back cast inventory for 1990 as part of the Climate Action 2020 and Beyond (CAP) development process. The CAP, adopted in July 2016, includes 20 GHG reducing goals that work to increase clean energy use, active transportation, smart growth, and protecting and enhancing the value of open and working lands, among other goals (RCPTA 2020). In 2018, Sonoma County adopted the Climate Change Action Resolution Number 18-0166 (resolution). The resolution was developed in part with the CAP to develop measures specific to Sonoma County that will result in the reduction of GHGs. The County of Sonoma currently has in place countywide GHG reduction goals including a 2030 goal of 40 percent below 1990 levels, and a 2050 goal of 80 percent below 1990 levels.

3.12.2 Discussion

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

Less than significant. NoSoCo Air does not have specific GHG emissions thresholds and therefore relies on guidance developed by BAAQMD regarding construction and operational GHG emissions. BAAQMD has developed a bright-line threshold of 1,100 metric tons of carbon dioxide equivalent per year (MTCO₂e/year) regarding operational GHG emissions with the intention of attributing an appropriate share of GHG emission reductions necessary to reach AB 32 goals for proposed land use development projects under CEQA. However, AB 32's GHG reduction target date of 2020 has passed and GHG emissions reduction are now to be analyzed in meeting updated targets provided by SB 32 for GHG reduction target year of 2030 and beyond 2030 for carbon neutrality (i.e., AB 1279). At the time of preparing this analysis, BAAQMD has not updated its bright-line threshold to be consistent with SB 32 reduction targets for which the project construction date aligns with. Thus, a project-specific threshold has been developed by applying SB 32's reduction target of 40 percent below 1990 GHG emissions level to the 1,100 MTCO₂e/year bright-line threshold, which brings the threshold of significance for operational GHG emissions to 660 MTCO₂e/year. This threshold is presented to demonstrate consistency with statewide goals for the project construction year. However, this linear reduction approach oversimplifies the threshold development process. It is not the intent of this document to propose the adoption of this threshold as a mass emissions limit or CEQA GHG threshold for general use, but rather to provide this additional information to put the project generated GHG emissions in the appropriate statewide context. As mentioned previously, BAAQMD has not developed any thresholds regarding construction-related GHG emissions. Therefore, the total construction related GHG emissions were amortized over a 30-year project lifespan, combined with the annual operational GHG emissions, and compared to the bright-line threshold.

Project construction would involve site preparation, vegetation clearing, rough grading, excavation and foundation work, and paving, all of which have the potential to generate GHG emissions from heavy equipment use, worker commute trips, and vendor and haul truck activity. Long-term GHG emissions sources associated with project operation would include area sources, such as exhaust from landscape equipment, solid waste sources generated by the new amenities and uses, such as picnic area trash cans and restroom facilities, and vehicular use from visitors. Construction and operational-generated emissions were estimated using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.21 (CAPCOA 2023). Modeling was based on project-specific information (i.e., 16-month construction schedule, equipment type, trip generation rates, and acres disturbed) and reasonable assumptions based on typical construction activities. Where project-specific details were unavailable, default values in CalEEMod were used based on the project's location and land use type. For detailed assumptions and modeling inputs, refer to Appendix A.

During construction, the project would generate a total of 408 MTCO₂e from equipment use and vehicle trips. Amortized construction emissions would result in 13 MTCO₂e/year over a 30-year project lifespan. During operations, the project is estimated to generate roughly 10 MTCO₂e/year from area sources (i.e., landscape equipment), energy

sources (i.e., site host electrical hook up), solid waste generation, and mobile sources (i.e., vehicle trips). Table 3.12-2 provides a comparison of estimated annual project-generated GHG emissions relative to the 660 MTCO₂e/year BAAQMD threshold.

Table 3.12-2 Estimated Annual Construction and Operational GHG Emissions

Emissions Source	GHG Emissions
Total Project Construction Emissions	408
Amortized Project Construction Emissions	13 MTCO ₂ e/year
Area	<1 MTCO ₂ e/year
Energy	<1 MTCO ₂ e/year
Mobile	10 MTCO ₂ e/year
Solid Waste	<1 MTCO ₂ e/year
Annual Operation Total	10 MTCO ₂ e/year
Operation and Amortized Construction	23 MTCO ₂ e/year
BAAQMD Threshold	660 MTCO ₂ e/year
Exceed Threshold?	No

Notes: MTCO₂e = metric tons of carbon dioxide equivalent; amortized construction emissions assumed 30-year project life span. Energy electricity emissions sources calculated off-model, see Appendix A for energy source GHG emissions.

Source: Appendix A (calculations by Ascent in 2024).

As shown in Table 3.12-2, the annual amortized construction emissions combined with annual operational emissions would be 23 MTCO₂e per year, which would not exceed BAAQMD's adjusted bright-line threshold of 660 MTCO₂e per year. In addition, even if construction emissions were not amortized, the total estimated construction-related emissions in combination with operational emissions (assuming operations could begin during the same year of construction) would be 418 MTCO₂e/year, which would also be below the adjusted bright-line threshold of 660 MTCO₂e/year. Therefore, project-generated GHG emissions would be consistent with the statewide GHG target established by SB 32 and would not generate GHGs that may have a significant impact on the environment. Therefore, this impact would be **less than significant**.

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

No impact. CARB adopted the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) on December 16, 2022, which traces the State's the pathway to achieve its carbon neutrality and an 85 percent reduction in 1990 emissions goal by 2045 using a combined top-down, bottom-up approach under various scenarios. It identifies the reductions needed by each GHG emission sector (e.g., transportation [including off-road mobile source emissions], industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste) to achieve these goals. Because the project would promote the conservation of open space, the project would not conflict with the 2022 Scoping Plan measures. In addition, the County's resolution and regional CAP promotes the reduction in GHG emissions through increasing clean energy use, active transportation, smart growth, and protecting and enhancing the value of open and working lands. Because the project would not result in substantial ongoing energy use, it would be a local serving use for low intensity recreational activities, and would promote conservation of land, it would not conflict with the County's efforts to reduce GHG emissions. There would be **no impact**.

3.13 HAZARDS AND HAZARDOUS MATERIALS

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

3.13.1 Environmental Setting

HAZARDOUS MATERIALS

Hazardous materials are substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Examples of hazardous materials are petroleum, natural and synthetic gas, and other toxic chemicals that may be used in agriculture or commercial and industrial uses, businesses, and households.

The term “hazardous materials,” as used in this section, includes all materials defined in the California Health and Safety Code as:

A material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. “Hazardous materials” include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment (§§ 25411, 25501).

A Phase I Environmental Site Assessment was prepared for the project in 2020 and indicates that there are no known hazardous materials or hazardous materials sites within or adjacent to (within 1,000 feet) of the project site. In addition, the nature of off-site contamination (e.g., the distance from the project site, groundwater flow-direction relative to the project site, nature of the reported release) poses no threat of adverse environmental effects to the project site (Appendix C).

SCHOOLS

The closest schools to the project site are Jefferson Elementary School, Washington Middle School, and Cloverdale High School. All three schools are located in the City of Cloverdale, approximately 5 miles south of the project site, and are all a part of the Cloverdale Unified School District.

AIRPORTS

No airports or private airstrips are within the project vicinity. The closest public airport is the Cloverdale Airport located approximately 5 miles south of the project site.

EMERGENCY RESPONSE AND EVACUATION PLANS

The Sonoma County Department of Emergency Management (DEM) is responsible for supporting emergency response and disaster readiness within the County and prepared the Operational Area’s Emergency Operations Plan (EOP) (Sonoma County 2021a). The phases of emergency management include preparedness, response, recovery, and mitigation. The EOP is intended to facilitate coordination between agencies and jurisdictions within Sonoma County while ensuring the protection of life, property, and the environment during disasters (Sonoma County 2021a).

REGULATORY SETTING

California Department of Toxic Substances Control

The California Department of Toxic Substances Control (DTSC), a division of the California Environmental Protection Agency (CalEPA), has primary regulatory responsibility over hazardous materials in California, working in conjunction with EPA to enforce and implement hazardous materials laws and regulations. DTSC can delegate enforcement responsibilities to local jurisdictions. The hazardous waste management program enforced by DTSC was created by the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in the CCR Title 26. The state program is similar to, but more stringent than, the federal program under the Resource Conservation and Recovery Act (RCRA). The regulations list materials that may be hazardous and establish criteria for their identification, packaging, and disposal. Environmental health standards for management of hazardous waste are contained in CCR Title 22, Division 4.5. In addition, as required by California Government Code Section 65962.5, DTSC maintains a Hazardous Waste and Substances Site List on EnviroStor, an online database that contains hazardous material sites that meet the criteria to be on the Cortese List. Hazardous material sites listed on EnviroStor include federal and state response sites, voluntary, school, and military cleanups and corrective actions, and permitted sites (SWRCB 2020).

California's Secretary for Environmental Protection has established a unified hazardous waste and hazardous materials management regulatory program (Unified Program) as required by SB 1082 (1993). The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities for the following environmental programs:

- ▶ Hazardous waste generator and hazardous waste on-site treatment programs;
- ▶ Underground Storage Tank (UST) Program;
- ▶ hazardous materials release response plans and inventories;
- ▶ California Accidental Release Prevention Program;
- ▶ Aboveground Petroleum Storage Act requirements for spill prevention, control, and countermeasure plans; and
- ▶ California Uniform Fire Code hazardous material management plans and inventories.

The six environmental programs within the Unified Program are implemented at the local level by local agencies – Certified Unified Program Agencies (CUPAs). CUPAs fulfill the responsibilities previously managed by approximately 1,300 State and local agencies, providing a central permitting and regulatory agency for permits, reporting, and compliance enforcement. DTSC regulations would be applicable to the project through the enforcement of spill prevention requirements that the construction contractor would comply with during construction.

State Water Resources Control Board and Regional Water Quality Control Boards

The SWRCB and nine regional water quality control boards (RWQCBs) are responsible for ensuring implementation and compliance with the provisions of the federal Clean Water Act and the State Porter-Cologne Act. The Porter-Cologne Act of 1969 is California's statutory authority for the protection of water quality. Along with the SWRCB and RWQCBs, water quality protection is the responsibility of numerous water supply and wastewater management agencies, as well as city and county governments, and requires the coordinated efforts of these various entities.

The SWRCB maintains GeoTracker, an online database used to track and archive compliance data from authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from USTs. GeoTracker was initially developed in 2000 pursuant to a mandate by the California State Legislature (AB 592 and SB 1189) to investigate the feasibility of establishing a statewide geographic information system (GIS) for leaking underground storage tank (LUST) sites (SWRCB 2020). The GeoTracker database tracks regulatory data for designated Cortese List sites including LUST cleanup sites, solid waste disposal sites, and active Cease and Desist Orders and Cleanup and Abatement Orders (CalEPA 2021).

3.13.2 Discussion

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

Less than significant. Construction of the project would consist of initial site preparation, grading, excavation, material laydown and placement, and site cleanup. These activities would require the use of limited quantities of common hazardous materials, such as fuels, oils, lubricants, or other fluids associated with the operation and maintenance of vehicles or mechanical equipment. The transport, use, or disposal of hazardous materials could result in accidents or upset of hazardous materials that could create hazards to people or the environment. However, the use of common hazardous materials would be temporary and intermittent, occurring only during the project construction period and would not involve the routine use, transport, or disposal of hazardous materials. In addition, all hazardous materials would be used, stored, and disposed of in accordance with applicable federal, state, and local laws.

During operation, the only routine use or transport of hazardous materials would be to operate vehicles and equipment to conduct site maintenance activities and to service the vault toilet. Operations and maintenance activities would be similar to existing conditions, with the addition of daily bathroom cleaning, trash removal, and as-needed graffiti removal. Regional Parks would also visually inspect and maintain trails and other infrastructure on an ongoing basis and

make repairs as needed, particularly following storm events. These types of maintenance activities require little mechanical equipment or use of hazardous materials. Servicing the vault toilet would involve the removal and transport of wastewater, which is a hazardous material. Accidental spills during these servicing events could lead to hazards to the public or environment. However, this would occur by a professional third-party contractor with proper training in servicing vault toilets and immediately responding to spills should they occur. Therefore, the risk of an accidental spill and substantial contamination would be low.

For the reasons described above, the project would not create a significant hazard to the public or environment through the transport, use, or disposal of hazardous materials and the impact would be **less than significant**.

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

Less than significant. As described above under criterion a), hazardous material use during project construction would be limited to the use of common hazardous materials, such as fuels and lubricants to operate equipment, and would be used, stored, and disposed of in accordance with applicable federal, state, and local laws. In addition, during project operations, very few hazardous materials would be used and the risk of an accident associated with servicing the vault toilets would be low. Furthermore, as described under "Hazardous Materials," above, there are no known hazardous materials or hazardous materials sites within or adjacent to the project site. However, if an unknown hazardous waste site is uncovered during ground-disturbing activities associated with the project, it could create a significant hazard to the environment or public if accidentally released. If evidence of hazardous waste is encountered during construction, Regional Parks would implement the applicable requirements of the Comprehensive Environmental Release Compensation and Liability Act and the California Code of Regulations Title 22 regarding the safe handling and disposal of waste. Therefore, this impact would be **less than significant**.

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

No impact. The project site is not within 0.25 mile of an existing or proposed school. The closest schools to the project site are located approximately 5 miles south in the City of Cloverdale. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. **No impact** would occur.

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

No impact. No hazardous materials sites regulated under Government Code Section 65962.5 are present within the project site and no surrounding sites were identified within at least a 1,000-foot radius of the project site. The project would therefore not create a significant hazard to the public or the environment from being located on or near a hazardous materials site and **no impact** would occur.

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?

No impact. The project site is not within an airport land use plan, or within 2 miles of an existing airport. Cloverdale Airport is the nearest airport and is located 5 miles south of the project site. Therefore, **no impact** would occur.

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

Less than significant. The project site is within the jurisdiction of the Sonoma County DEM, the agency responsible for supporting emergency response and disaster readiness within the County, which has prepared the Operational Area's Emergency Operations Plan.

The project could impair the implementation of DEM's emergency response plan if project construction or operations impaired emergency access to the project site or prevented evacuation from the project site. The project involves the construction of new amenities to support existing public access and recreation, including formal trail entrances and access areas; public parking areas with oversized parked spaces for RVs on the shoulder of Geysers Road; four vault toilets; picnic areas; and establishment of a connector path. These new project features would not obstruct Geysers Road or otherwise impair emergency access or evacuation to or from the project site. In addition, as a part of the building permit process, the Fire Prevention and Hazardous Materials Division of Permit Sonoma would review to confirm that for any type of emergency, the responding emergency services will be able to reach the project site quickly and safely under any conditions and have room to operate their equipment. The project would therefore have a **less-than-significant** impact related to impairing the implementation of an emergency response plan.

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

Less than significant. As described in Section 3.20, "Wildfire," the project site is in a Moderate and Very High Fire Hazard Severity Zone. The project involves the construction of new amenities to support existing public access and recreation, including formal trail entrances and access areas; public parking areas with oversized parked spaces for RVs on the shoulder of Geysers Road; four vault toilets; picnic areas; and establishment of a connector path. The project could result in an increase in visitation by developing formalized amenities; however, people use the project site under existing conditions and only low-intensity recreation would be allowed (i.e., no all-terrain vehicle use or other activities with ignition risks). In addition, no permanent residences or other inhabited structures are proposed. Therefore, the project would not expose people or structures to significant hazards involving wildfires and the impact would be **less than significant**.

3.14 HYDROLOGY AND WATER QUALITY

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

3.14.1 Environmental Setting

WATER QUALITY

The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) are responsible for ensuring implementation and compliance with the provisions of the federal Clean Water Act (CWA) and the State Porter-Cologne Act. The project site is within the jurisdiction of the North Coast RWQCB, which prepared and periodically updates the Water Quality Control Plan for the North Coast Region (Basin Plan). The Basin Plan describes beneficial uses of water bodies within the North Coast RWQCB's jurisdiction including the services and qualities of these aquatic systems. The beneficial uses of inland surface waters described within the Basin Plan include municipal and

domestic supply, agricultural supply, commercial and sport fishing, freshwater replenishment, industrial process supply, groundwater recharge, preservation of rare and endangered species, water contact recreation, noncontact water recreation, wildlife habitat, cold freshwater habitat, warm freshwater habitat, fish migration, and fish spawning (SWRCB 2016). In addition to preparing and updating the Basin Plan, the North Coast RWQCB administers the adoption of waste discharge requirements, manages groundwater quality, and approves projects within its boundaries under the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities. Impaired water bodies are surface waters that do not meet water quality standards established by the EPA (303(d) list).

The Russian River, a portion of which is adjacent to the project site, drains a 1,485 square mile watershed in Mendocino and Sonoma counties. The two major dams in the watershed create Lake Mendocino and Lake Sonoma. Major tributaries to the Russian River include Forsythe Creek, Big Sulphur Creek, Dry Creek, Austin Creek, and Laguna de Santa Rosa. Many waterbodies in the Russian River watershed are listed under CWA Section 303(d) due to water quality impairments caused by several different pollutants. The entire Russian River watershed is impaired for sediment and temperature as well as pathogen, mercury, phosphorus, and dissolved oxygen impairments. The Russian River watershed is designated under Section 303(d) of the Clean Water Act as an impaired waterbody because of the presence of mercury pollution measured in fish tissue (NCRWQCB 2021).

GROUNDWATER

Groundwater is not abundantly present in the project site, nor is it identified by any agency. Sonoma County has classified the region as a Low/Highly Variable Water Yield Area (Sonoma County 2020). Additionally, USGS has not identified any aquifers or wells in the area (USGS 2009). However, the proposed project site is underlain by the Alexander Valley Groundwater Basin, which occupies a structural depression in the Coast Ranges north of the San Francisco Bay (USGS 2009). The project site is locally bounded by low hills consisting of unconsolidated water-yielding sediments. The basin boundary extends from Alderglen Springs and Preston in the north to about 1 mile south of Asti (DWR 1983). The southern boundary is noted by a reduced section of water-bearing materials between Cloverdale and Alexander valleys. The Russian River flows south along the entire length of the basin and is joined by Big Sulphur Creek, a principal tributary, at the north end of Cloverdale Valley. Precipitation in the Alexander Valley ranges from 40 to 44 inches over the entire basin (DWR 1983).

FLOOD HAZARDS

The Pacific Ocean is approximately 32 miles west of the project site and is separated by the Elk Mountain Range in Mendocino County. Thus, a tsunami would not be capable of reaching the project site. Although the project site is adjacent to the Russian River, it is not within a flood hazard zone designated by the Federal Emergency Management Agency (FEMA 2009). A seiche occurs when strong wind events or rapid changes in atmospheric pressure push water from one end of a body of water to the other (NOAA 2021). These typically occur in large bodies of water such as lakes or reservoirs and the risk of a seiche at the project site is low.

The nearest dam to the project site is Warm Springs Dam, located west of US 101, approximately 10 miles south of the project site. Lake Sonoma is a tributary to the Russian River and is created by Warm Springs Dam; it is located approximately 10 miles south of the project site on Dry Creek. Warm Springs Dam and Lake Sonoma were constructed by USACE and authorized by the Flood Control Act of 1962 for the purposes of flood control, water supply, environmental stewardship, and recreation (USACE 2004). According to dam failure inundation mapping prepared by Sonoma County, potential inundation from a dam failure could occur in north and east Cloverdale; however, the project site is outside of the area of potential inundation (Sonoma County 2011b).

3.14.2 Discussion

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

Less than significant with mitigation. Project operations would be similar to existing conditions and would not result in any activities that result in a violation of water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. No work within the waters of the Russian River would occur, and all construction laydown, staging, and activity would occur outside of the FEMA floodplain associated with the Russian River. However, ground-disturbing construction activities that are conducted during the wet season could result in erosion, sedimentation, and runoff, which could adversely affect the Russian River, a Section 303(d) impaired waterbody. Installation of temporary erosion control BMPs (e.g., wattles, silt fencing) as required by the SWPPP would help to prevent contaminated runoff from project construction above the top of the bank of the Russian River from reaching the river. However, portions of the project (e.g., trails, invasive plant removal) would occur below the top of the bank of the Russian River (Figures 2-3 and 2-5). While the proposed trails below the top of the bank of the Russian River would occur partially within the footprint of existing informal trails and would resolve current erosion issues with these trails, construction of these features during the wet season could result in contaminated runoff and sediment flowing into the Russian River, due to the steep slope of the riverbank and the close proximity to the river. This contaminated runoff and sediment could have a potentially substantial negative effect on the Russian River, which would constitute a **potentially significant** impact.

Mitigation Measures

Mitigation Measure BIO-1: Avoid and Minimize Runoff from Trail Construction on the Bank of the Russian River

Significance after Mitigation

Mitigation Measures BIO-1 would avoid and minimize adverse effects to Russian River water quality from the implementation of the proposed project by suspending ground-disturbing activities below the top of the bank of the Russian River when it is raining or soils are saturated. This would prevent construction related erosion, sedimentation, and construction debris from entering stormwater and flowing into the Russian River. Therefore, with the implementation of Mitigation Measure BIO-1, the impact on water quality would be **less than significant with mitigation incorporated**.

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

Less than significant. The project would implement several new features to support public access and recreation. No water would be required for operation; however, water would be used for dust abatement during construction. Dust abatement activities would be temporary and intermittent and would not involve the substantial use of groundwater or otherwise affect recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Furthermore, no new permanent increase in water demand would result from the project and the increase in impervious surfaces in the project site would not be substantial relative to the surrounding undeveloped areas that allow groundwater recharge. Thus, the impact would be **less than significant**.

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

i) Result in substantial on- or off-site erosion or siltation;

Less than significant. Ground-disturbing construction activities and the permanent increase in impervious surface within the project site could increase on or off-site erosion or siltation. The increase in impervious surfaces in the project site would be

minor (up to 8,000 square feet over the 25-acre project site) and associated with small building pads and foundations for picnic areas and vault toilets, and would not be substantial relative to the surrounding undeveloped areas. In addition, the SWPPP that would be developed for the project would include BMPs to minimize erosion and siltation such as the installation of perimeter siltation fencing and wattles and the use of erosion control mats. Therefore, the project would have a **less-than-significant** impact related to substantial on- or off-site erosion or siltation.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

No impact. As described above in criterion c) (i), the proposed project would result in limited and discrete permanent aboveground impermeable surfaces (e.g., concrete pads associated with vault toilets). The increase in impervious surfaces would be negligible relative to surrounding undeveloped and permeable areas and would not increase the rate of runoff in a manner that would result in flooding. Therefore, **no impact** would occur.

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

Less than significant. The project would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional polluted runoff. As described under criteria c) (i) and c) (ii) above, the increase in impervious surfaces in the project site would not be substantial relative to the surrounding undeveloped areas and would not increase the rates of runoff in the project site. As described in Chapter 2, "Project Description," the gravel parking area on the west side of Geysers Road in Access Area 3 would be regraded to restore natural sheet flow toward the picnic areas west of the parking area, and existing stormwater catchment basins along Geysers Road would remain unchanged and continue to capture runoff from the road. In other areas, stormwater runoff would continue to percolate into the native ground on the project site. Furthermore, Regional Parks would implement various stormwater and water quality control measures during construction according to the SWPPP, which would reduce the creation of additional sources of polluted runoff caused by the project. Therefore, the impact would be **less than significant**.

iv) Impede or redirect flood flows?

Less than significant. The proposed project would result in the development of new amenities to support existing public recreation on the project site, including formal parking areas, picnic areas, a connector path, trail improvements, and other public amenities, which do not have walls or other solid structures that could impede or redirect flows. Up to four vault toilets would be constructed, which would be structures with walls; however, they would be small, each only accommodating one person, and would therefore not impede or redirect flood flows. The project would not create any new, large structures or anything else that would substantially impede or redirect flows and the impact would be **less than significant**.

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

No impact. The project is not within a flood hazard, tsunami, or seiche zone, where the risk of release of pollutants from project inundation could occur. The project would therefore have **no impact**.

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

Less than significant with mitigation. The project is also within the jurisdiction of the Sonoma County Water Agency (SCWA), which prepared the 2020 Urban Water Management Plan (UWMP) which describes SCWA's actions and goals to ensure continued sustainable groundwater management. The project could conflict with or obstruct the implementation of the 2020 UWMP if it required substantial groundwater for construction or operation (SCWA 2020). As described above in criterion b), no water would be required for project operations. During construction, water would be used for dust abatement. Dust abatement activities would be temporary and intermittent and would not involve the

substantial use of groundwater or otherwise affect the recharge of the Sonoma Valley Groundwater Basin. The project would therefore not conflict with or obstruct a sustainable groundwater management plan.

The project is also within the jurisdiction of the North Coast RWQCB and Regional Parks is required to comply with the Basin Plan. If the project were to substantially impair water quality and diminish the beneficial uses listed in the Basin Plan, the project could conflict with or obstruct the implementation of the Basin Plan. As described above under criterion a), installation of temporary erosion control BMPs (e.g., wattles, silt fencing) as required by the SWPPP would help to prevent contaminated runoff from project construction above the top of the bank of the Russian River from reaching the river. However, portions of the project (e.g., trails, invasive plant removal) would occur below the top of the bank of the Russian River (Figures 2-3 and 2-5). While the proposed trails below the top of the bank of the Russian River would occur partially within the footprint of existing informal trails and would resolve current erosion issues with these trails, construction of these features during the wet season could result in contaminated runoff and sediment flowing into the Russian River, due to the steep slope of the riverbank and the close proximity to the river. This contaminated runoff and sediment could have a potentially substantial negative effect on the Russian River and obstruct implementation of the Basin Plan, which would constitute a **potentially significant** impact.

Mitigation Measures

Mitigation Measure BIO-1: Avoid and Minimize Runoff from Trail Construction on the Bank of the Russian River

Significance after Mitigation

Mitigation Measures BIO-1 would avoid and minimize adverse effects to Russian River water quality from the implementation of the proposed project by suspending ground-disturbing activities below the top of the bank of the Russian River when it is raining or soils are saturated. This would prevent construction related erosion, sedimentation, and construction debris from entering stormwater and flowing into the Russian River. Therefore, with the implementation of Mitigation Measure BIO-1, the impact on water quality would be **less than significant with mitigation incorporated**.

3.15 LAND USE AND PLANNING

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. Land Use and Planning.				
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

3.15.1 Environmental Setting

The project site's land use designation and zoning in Sonoma County is RRD, which permits low intensity recreation (Sonoma County 2018b). According to the Sonoma County Land Use Element, low-intensity recreation is allowed in areas designated as RRD if the recreational opportunities support the study, appreciation, or enhancement of the natural environment. The RRD district is also intended to allow very low-density residential development and recreational and visitor-serving uses where compatible with resource use and available public services (Sonoma County 2018b).

The project site is bound by Geysers Road on the east and the Russian River on the west and extends approximately 1.75 miles south of a point just beyond the Sonoma County/Mendocino County line. The Russian River RV Campground (with a mix of 125 RV, tent, cottage, and cabin sites) is located on the southwest side of Geysers Road and between the Russian River and the project site, and small areas of rural residences (i.e., Preston Heights) are located east of Geysers Road and adjacent to the project site. Ash Creek extends through the northern portion of the project site. Vegetative habitats in and around the project site are characterized as ruderal, non-native annual grassland, chaparral, riparian woodland, pine woodland, and mixed oak and bay woodlands. Areas of the project site have been damaged by previous unregulated use and the creation of informal trails, which has introduced ruderal (weedy) and invasive species to otherwise intact native habitat.

3.15.2 Discussion

a) Physically divide an established community?

No impact. No established communities are located within the project site. The residential community of Preston Heights is located on the east side of Geysers Road in the vicinity of the project site; however, the project does not propose any features that could physically divide the community. Therefore, the project would not physically divide an established community and **no impact** would occur.

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?

Less than significant. The project site is designated RRD by Sonoma County, which permits low intensity recreation that supports the study, appreciation, or enhancement of the natural environment. The RRD district also allows recreational and visitor-serving uses where compatible with resource use and available public services (Sonoma County 2018b). The project would develop new public access features to support public access and recreation at the project site. Only low intensity recreational activities would be permitted, such as picnicking, hiking, fishing, nature appreciation, and photography. Therefore, the project would be consistent with the RRD land use designation and would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation; the impact would be **less than significant**.

3.16 MINERAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. Mineral Resources.				
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
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?	☐	☐	☒	☐

3.16.1 Environmental Setting

The project site is classified as Mineral Resource Zone (MRZ)-2 (Stinson, M. C., Manson, M. W., & Plappert, J. J. 1987). MRZ-2 areas are underlain by mineral deposits where geologic data show that significant measured or indicated resources may be present; however, no existing mineral resource recovery sites are known to be located within the project site. Along the Russian River from north of Cloverdale to the vicinity of the Wohler Bridge, and along the lower 15 miles of Dry Creek, are extensive deposits of sand and gravel which supply the high-quality aggregate for most of the North San Francisco Bay Region (DOC 1987).

3.16.2 Discussion

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?

Less than significant. While no mineral resource recovery sites are known to occur, the project site is classified as MRZ-2, which indicates that portions of the project site may contain mineral deposits where geologic data shows the potential of resources present. The project would implement several new features to support public access and recreation, including picnic areas, vault toilets, and formalizing trails and parking areas. If mineral resources are present in the project site, their availability would not be restricted by implementation of new and improved public access features because they would be small, spread across the project site, and would not result in substantial permanent coverage of native ground where deposits could be present. The project would therefore have a **less-than-significant** impact related to the loss of availability of a known mineral resource.

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?

Less than significant. Areas along the Russian River are known to contain extensive deposits of sand and gravel, some of which supply the high-quality aggregate for most of the North San Francisco Bay Region. The project site therefore has the potential to contain locally important mineral resources. However, as described under criterion a) above, the project would not restrict or result in the loss of the availability of mineral resources or mineral resource recovery sites. Therefore, the proposed project would have a **less-than-significant** impact on the loss of availability of a locally important mineral resource.

3.17 NOISE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. Noise.				
Would the project result in:				
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 in other applicable local, state, or federal standards?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

3.17.1 Environmental Setting

ACOUSTIC FUNDAMENTALS

Acoustics is the scientific study that evaluates perception, propagation, absorption, and reflection of sound waves. Sound is a mechanical form of radiant energy, transmitted by a pressure wave through a solid, liquid, or gaseous medium. Sound that is loud, disagreeable, unexpected, or unwanted is generally defined as noise. Noise is typically expressed in decibels (dB), which is a common measurement of sound energy. Definitions of acoustical terms used in this section are provided in Table 3.17-1.

Table 3.17-1 Acoustic Term Definitions

Term	Definition
Noise	Noise is generally defined as sound that is loud, disagreeable, unexpected, or unwanted.
Decibel (dB)	Sound levels are measured using the decibel scale, developed to relate to the range of human hearing. A decibel is logarithmic; it does not follow normal algebraic methods and cannot be directly summed. For example, a 65-dB source of sound, such as a truck, when joined by another 65-dB source results in a sound amplitude of 68 dB, not 130 dB (i.e., doubling the source strength increases the sound pressure by 3 dB). A sound level increase of 10 dB corresponds to 10 times the acoustical energy, and an increase of 20 dB equates to a 100-fold increase in acoustical energy.
A-weighted decibel (dBA)	The human ear is not equally sensitive to loudness at all frequencies in the audible spectrum. To better relate overall sound levels and loudness to human perception, frequency-dependent weighting networks were developed, identified as A through E. There is a strong correlation between the way humans perceive sound and A-weighted sound levels. For this reason, the A-weighted sound levels are used to predict community response to noise from the environment, including noise from transportation and stationary sources, and are expressed as A-weighted decibels. All sound levels discussed in this section are A-weighted decibels unless otherwise noted.

Term	Definition
Equivalent Noise Level (L_{eq})	The average noise level during a specified time period; that is, the equivalent steady-state noise level in a stated period of time that would contain the same acoustic energy as the time-varying noise level during the same period (i.e., average noise level).
Maximum Noise Level (L_{max})	The highest instantaneous noise level during a specified time period.

Source: Caltrans 2013a.

Noise Generation and Attenuation

Noise can be generated by many sources, including mobile sources such as automobiles, trucks, and airplanes and stationary sources such as activity at construction sites, machinery, and commercial and industrial operations. As sound travels through the atmosphere from the source to the receiver, noise levels attenuate (i.e., decrease) depending on ground absorption characteristics, atmospheric conditions, and the presence of physical barriers. Sound from a localized source (i.e., a point source) propagates uniformly outward in a spherical pattern. The sound level attenuates at a rate of 6 dB for each doubling of distance from a point source. Noise from a line source, such as a road or highway, propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source. Noise attenuation from ground absorption and reflective-wave canceling provides additional attenuation associated with geometric spreading. For acoustically absorptive sites such as soft dirt, grass, or scattered bushes and trees, an additional ground-attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the attenuation rate associated with cylindrical spreading, the additional ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance. This would hold true for point sources, resulting in an overall drop-off rate of up to 7.5 dB per doubling of distance.

Atmospheric conditions such as wind speed, wind direction, turbulence, temperature gradients, and humidity also alter the propagation of noise and affect levels at a receiver. Furthermore, the presence of a barrier (e.g., topographic feature, intervening building, and dense vegetation) between the source and the receptor can provide substantial attenuation of noise levels at the receiver. Natural (e.g., berms, hills, and dense vegetation) and human-made features (e.g., buildings and walls) may function as noise barriers.

To provide some context to noise levels described throughout this section, common sources of noise and associated noise levels are presented in Table 3.17-2.

Table 3.17-2 Typical Noise Levels

Common Outdoor Activities	Noise Level (dB)	Common Indoor Activities
	110	Rock band
Jet flyover at 1,000 feet	100	
Gas lawnmower at 3 feet	90	
Diesel truck moving at 50 mph at 50 feet	80	Food blender at 3 feet, garbage disposal at 3 feet
Noisy urban area, gas lawnmower at 100 feet	70	Vacuum cleaner at 10 feet, normal speech at 3 feet
Commercial area, heavy traffic at 300 feet	60	
Quiet urban daytime	50	Large business office, dishwasher in next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime	30	Library, bedroom at night, concert hall (background)
Quiet rural nighttime	20	Broadcast/recording studio
	10	
Threshold of human hearing	0	Threshold of human hearing

Notes: dB = A-weighted decibels; mph = miles per hour

Source: Caltrans 2013a.

Effects of Noise on Humans

Exposure to excessive noise may result in physical damage to the auditory system, which may lead to gradual or traumatic hearing loss. Gradual hearing loss is caused by sustained exposure to moderately high noise levels over a period of time; traumatic hearing loss is caused by sudden exposure to extremely high noise levels over a short period. Non-auditory behavioral effects of noise on humans are primarily subjective effects such as annoyance, nuisance, and dissatisfaction, which lead to interference with activities such as communications, sleep, and learning.

EXISTING NOISE SOURCES AND LEVELS

The project is located on Geysers Road and in the vicinity of US 101 in unincorporated Sonoma County. The noise environment within the project site is influenced primarily by vehicle traffic on Geysers Road, as well as from vehicle traffic along US 101. The traffic noise levels at the closest project site boundary (i.e., 400 feet) to the centerline of US 101, between the US 101 junction with State Route 138 West and the Sonoma/Mendocino County line, was estimated to be 60 dB community noise equivalent level (CNEL) (Appendix D).

NOISE- AND VIBRATION-SENSITIVE LAND USES AND RECEPTORS

Noise- and vibration-sensitive land uses generally include those uses where noise exposure could result in health-related risks to individuals, places where a quiet setting is an essential element of the intended purpose (e.g., schools and libraries), and historic buildings that could sustain structural damage due to vibration. The project is in a sparsely populated area where land is generally undeveloped. Noise sensitive receptors in the vicinity of the project site include nearby residents and campers at the Russian River Campground, and are approximately 30 to 400 feet from the project site along Geysers Road. The closest sensitive receptors to project activities include a single-family residence located 30 feet west of Geysers Road and the proposed connector path and a single-family residence located approximately 270 feet southwest of Access Area 3.

AIRPORTS AND PRIVATE AIRSTRIPS

There are no public airports or private airstrips within the project vicinity. Cloverdale Airport, the closest airport, is located approximately 5 miles south of the project site.

REGULATORY SETTING

Federal Regulations

Federal Transit Administration

The Federal Transit Administration (FTA) provides guidance on evaluating human response to ground vibration. The FTA has set forth guidelines for maximum-acceptable vibration criteria for different types of land uses where people live or work. These guidelines are presented in Table 3.17-3.

Table 3.17-3 Groundborne Vibration Impact Criteria for Human Response

Land Use Category	Ground-Borne Vibration Impact Levels for Human Response (VdB re 1 microinch/second) Frequent Events ¹	Ground-Borne Vibration Impact Levels for Human Response (VdB re 1 microinch/second) Occasional Events ²	Ground-Borne Vibration Impact Levels for Human Response (VdB re 1 microinch/second) Infrequent Events ³
Category 1: Buildings where vibration would interfere with interior operations.	65 ⁴	65 ⁴	65 ⁴
Category 2: Residences and buildings where people normally sleep.	72	75	80
Category 3: Institutional land uses with primarily daytime uses.	75	78	83

Notes: VdB re 1 microinch/second = vibration decibels referenced to 1 microinch/second and based on the root mean square (RMS) velocity amplitude.

¹ "Frequent Events" is defined as more than 70 vibration events of the same source per day.

² "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.

³ "Infrequent Events" is defined as fewer than 30 vibration events of the same source per day.

⁴ This criterion is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research would require detailed evaluation to define acceptable vibration levels.

Source: FTA 2018.

State Regulations

California Department of Transportation

In 2013, Caltrans published the Transportation and Construction Vibration Manual, which provides general guidance on vibration issues associated with construction and operation of projects in relation to human perception and structural damage (Caltrans 2013b). Table 3.17-4 presents recommendations for levels of vibration that could result in damage to structures exposed to continuous vibration.

Table 3.17-4 Structural Damage Potential to Buildings at Various Groundborne Vibration Levels

Effect on Buildings	PPV (in/sec)
Architectural damage and possible minor structural damage	0.12
Risk of architectural damage to normal dwelling houses	0.2
Virtually no risk of architectural damage to normal buildings	0.5
Recommended upper limit of vibration to which ruins and ancient monuments should be subjected	0.5
Vibration unlikely to cause damage of any type	1.0

Note: in/sec = inches per second; PPV = peak particle velocity

Source: Caltrans 2013b.

Local Regulations

The project site is located in unincorporated Sonoma County and is therefore subject to the noise standards and permitting developed by the County of Sonoma. The Guidelines for the Preparation of Noise Analysis, prepared by the Sonoma County Permit and Resource Management Department (Permit Sonoma), provides guidance for the analysis of potential noise impacts of new public and private development projects, and establishes mitigation measures and conditions of approval to avoid or substantially lessen those potential impacts (Sonoma County 2019).

According to Section 5 of the Guidelines for the Preparation of Noise Analysis, temporary construction noise generally needs to be evaluated at a qualitative level, given its temporary and short-term nature, however, construction noise may be considered significant if it occurs in the early morning or evening hours and should be evaluated quantitatively. If construction activities occur during the hours of 10 p.m. to 7 a.m., then additional noise standards need to be applied. If

construction activities and the associated noise were to occur for a period of more than 1 year, then a noise analysis, using Sonoma County General Plan thresholds, would be required.

The guidance suggests measures should be considered in cases where sensitive receptors may be impacted to reduce noise levels generated by construction equipment, which include:

- ▶ Limiting hours of construction to avoid the early morning and evening hours (such as 7:00 a.m. to 7:00 p.m. weekdays and 7:00 a.m. to 5:00 p.m. weekends).
- ▶ Limiting work to non-motorized equipment on Sundays and holidays.
- ▶ Using sound blankets for loud operations such as pile driving, air compressors or other mechanical equipment, and consider pre-drilling holes prior to pile driving.
- ▶ Siting construction staging areas as far as practical from nearby sensitive receptors.
- ▶ Requiring street legal mufflers on all construction equipment.

County of Sonoma General Plan Noise Element

The Noise Element of the Sonoma County General Plan includes noise policies and standards to determine whether a project would have a significant impact with regards to transportation and non-transportation noise sources. Policies NE-1a and NE-1c include non-transportation noise standards relevant to the project. These noise standards are primarily geared towards a project's operational sources of noise (Sonoma County 2012).

- ▶ **Policy NE-1a:** Designate areas within Sonoma County as noise impacted if they are exposed to existing or projected exterior noise levels exceeding 60 dB L_{dn} , 60 dB CNEL, or the performance standards of Table NE-2.
- ▶ **Policy NE-1c:** Control non-transportation related noise from new projects. The total noise level resulting from new sources shall not exceed the standards in Table NE-2 as measured at the exterior property line of any adjacent noise sensitive land use. Limit exceptions to the following:
 1. If the ambient noise level exceeds the standard in Table NE-2, adjust the standard to equal the ambient level, up to a maximum of 5 dBA above the standard, provided that no measurable increase (i.e., +/- 1.5 dBA) shall be allowed.
 2. Reduce the applicable standards in Table NE-2 by 5 dBA for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises, such as pile drivers and dog barking at kennels.
 3. Reduce the applicable standards in Table NE-2 by 5 decibels if the proposed use exceeds the ambient level by 10 or more decibels.
 4. For short term noise sources which are permitted to operate no more than six days per year, such as concerts or race events, the allowable noise exposures shown in Table NE-2 may be increased by 5 dB. These events shall be subject to a noise management plan including provisions for maximum noise level limits, noise monitoring, complaint response and allowable hours of operation. The plan shall address potential cumulative noise impacts from all events in the area.
 5. Noise levels may be measured at the location of the outdoor activity area of the noise sensitive land use, instead of the exterior property line of the adjacent noise sensitive land use where:
 - a. the property on which the noise sensitive use is located has already been substantially developed pursuant to its existing zoning; and
 - b. there is available open land on those noise sensitive lands for noise attenuation.

3.17.2 Discussion

- 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 in other applicable local, state, or federal standards?**

Less than significant. Project-related noise would be generated by heavy equipment used on-site during project construction and by increased vehicle trips associated with project operation. These types of noise sources are discussed separately below.

Temporary Construction Noise

The use of heavy equipment during project construction would generate noise, resulting in a temporary increase in noise levels on and around the project site. Project construction would be limited to Mondays through Fridays, 7:00 a.m. to 5:00 p.m. and Saturdays 9:00 a.m. to 4:00 p.m.; no work would occur on Sundays or holidays.

As discussed previously, the Guidelines for the Preparation of Noise Analysis suggests temporary construction noise be evaluated at a qualitative level given its temporary and short-term nature. However, for disclosure purposes, noise levels associated with project construction activities were modeled and are presented hereafter. Project construction activities would involve the use of heavy equipment, such as rollers, dozers, tractors/loaders, pavers, cement mixers, chainsaws, and concrete/industrial saws. However, the specific construction equipment used would vary depending on the project phase and specific activities occurring. The loudest pieces of equipment that would be used during construction would be chainsaws, dozers, rollers, and pavers, all which generate noise levels ranging from 84 to 85 dBA L_{max} at 50 feet (FHWA 2006:3). Noise levels impacting sensitive receptors from construction activity associated with the connector path and access areas were modeled separately because construction activities and required equipment vary between construction activity and location. Therefore, construction equipment modeling conservatively assumes the simultaneous operation of the loudest pieces of heavy construction equipment operating at the location of the respective construction activity (see Appendix D). Construction of the connector path would require the operation of a dozer and a pickup truck. Based on the reference noise levels for these pieces of equipment and accounting for typical attenuation rates, noise levels would attenuate to 86.9 dBA L_{eq} at the nearest sensitive receptor, located 30 feet from construction activity at its closest point. Construction activities associated with improvements to Access Area 3 (i.e., the access area located closest to receptors), would require operation of a tractor and a dozer. Based on the reference noise levels for these pieces of equipment and accounting for typical attenuation rates, noise levels would attenuate to 62.9 dBA L_{eq} at the nearest sensitive receptor, located 270 feet from the access area construction activity.

Because project construction would be limited to Mondays through Fridays, 7:00 a.m. to 5:00 p.m. and Saturdays 9:00 a.m. to 4:00 p.m., and no work would occur on Sundays or holidays, potential construction noise impacts are evaluated qualitatively for the purposes of making a significance conclusion under CEQA. Noise generated by construction activities would be temporary and periodic in nature and would only occur during daytime hours when people are less sensitive to noise. In addition, due to the linear nature of the project, equipment would not operate in the same location for extended periods of time thereby limiting the exposure of nearby receptors to noise. Furthermore, the project would be consistent with County of Sonoma measures for reducing noise generated by construction equipment, including limiting hours of construction to daytime hours and avoiding working on Sundays and holidays. Therefore, noise resulting from construction activity would not have a substantial impact on nearby receptors and is consistent with local guidance on analyzing noise impacts.

Operational Noise

Transportation noises are the most significant sources of environmental noise in Sonoma County (Sonoma County 2012). As described in Section 3.17, "Transportation," operation of the project would result in up to 73 daily vehicle trips. Additionally, future maintenance and operation activities would require increased vehicle use from on-site parking enforcement and traffic control during peak holidays and weekly garbage collection and bathroom cleaning. Based on available existing traffic volumes on US 101 near the project site, existing noise levels were modeled to be 60 dB CNEL. In

accordance with Sonoma County Policy NE-1a, the project site does not currently exceed the noise standard (i.e., 60 dB), and is not in a noise impacted area.

As discussed above, Sonoma County has established that in noise-impacted areas, project-generated noise (measurable) increases of 1.5 dB would be considered substantial. Because noise levels at the project site were modeled to be 60 dB CNEL, which is right at the threshold for being considered a noise-impacted area, the 1.5 dB CNEL increase is used as a threshold to determine whether project impacts would be substantial. It should be noted that although a 1.5 dB increase may be considered substantial, a 3dB increase is generally accepted as the level at which perceptible increases occur. Based on available data for US 101 near the project site, traffic volumes are approximately 16,800 vehicles per day (Caltrans 2017). As mentioned previously, the trip generation resulting from the project would be minimal (i.e., 73 trips per day). Considering the existing volumes on US 101, project generated traffic volumes were modeled to estimate the increase in traffic noise level as a result of the 73 additional project generated trips. The increase of 73 trips per day is estimated to result in a noise level of 60 dB CNEL, or no changes to the existing noise levels. Therefore, the additional trips would result in noise levels well below the County-allowed increased for other sources (i.e., 1.5 dB), as well as below the level generally accepted as being perceptible (i.e., 3 dB). Although there would be up to nine RV stalls provided between Access Areas 1 and 3, parking within the project site would be prohibited daily between sunset and sunrise thereby limiting the number of trips to the site during the more sensitive nighttime hours for nearby receptors. Therefore, because project related vehicle trips would not result in the doubling of traffic volumes and would be barely perceptible to nearby receptors, and the project would limit vehicles from accessing the site at nighttime hours, the project would not expose any off-site receptors to excessive noise levels that would exceed the applicable noise standards or disturb people during the sensitive times of the day.

Summary

Construction activities associated with the project would occur during the less sensitive daytime hours, would cease once construction is complete, and are consistent with Sonoma County guidelines for evaluating noise impacts. Project operation would not expose off-site sensitive receptors to excessive traffic or other operational noise that would exceed County-allowable standards or disturb residents during the sensitive evening and nighttime hours. Therefore, this impact would be **less than significant**.

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

Less than significant. No major operational sources of vibration would be constructed within the project site; however, temporary vibration could occur during construction activities. Project construction would not involve the use of ground vibration-intensive activities, such as pile driving or blasting. Pieces of equipment that generate lower levels of ground vibration, such as rollers, dozers, and pavers, would be used during construction. These types of common construction equipment do not generate substantial levels of ground vibration that could result in structural damage, except at extremely close distances (i.e., within 26 feet or less). Construction activities would occur beyond 26 feet from any vibration-sensitive structure (i.e., closest residential structure located nearby any project activity is approximately 30 feet away) and thus would not generate ground vibration that exceeds the Caltrans-recommended criterion of 0.2 in/sec PPV with respect to structural damage.

To address the human response to ground vibration, FTA has established guidelines for maximum acceptable vibration impact criteria for different types of land uses. FTA recommends a maximum acceptable level of 80 vibration decibels (VdB) with respect to human response for residential uses (i.e., annoyance) for infrequent events (i.e., fewer than 30 events per day) (FTA 2018). FTA guidance for maximum acceptable VdB levels is primarily concerned with sleep disturbance in residential areas, which can be avoided by keeping exposures at or below 80 VdB during typical sleeping hours. Although no construction would occur during nighttime hours, VdB levels during daytime construction relative to FTAs recommendations for sleep disturbance in residential areas are presented herein for informational purposes.

Vibration levels impacting nearby receptors from construction activity at the connector path and Access Area 3 were modeled separately because construction activities and required equipment vary between construction activity and location. Based on the anticipated construction activities at each of these locations and considering reference vibration levels for construction equipment, the use of a dozer at the connector path and the use of a roller at Access Area 3

would generate the highest levels of vibration, affecting receptors closest to these areas. Considering reference levels for a grader and a roller, maximum VdB levels would range from 87 to 94 VdB at 25 feet from construction activities, respectively (FTA 2018). Based on this equipment and associated reference vibration levels, FTA's 80 VdB criteria for sleep disturbance would be exceeded within 75 feet of a roller and 43 feet of a dozer. Residential land uses are located as close as 30 feet from where a dozer could be used for construction at the connector path and receptors are as close as 270 feet from where a roller could be used for construction associated with Access Area 3. Based on reference vibration levels and these distances to construction activities, the closest receptor to connector path construction could be exposed to levels of vibration of 84.6 VdB and the closest receptor to construction at Access Area 3 could be exposed to vibration levels of 63 VdB.

Project construction would be limited to Mondays through Fridays, 7:00 a.m. to 5:00 p.m. and Saturdays 9:00 a.m. to 4:00 p.m., and no work would occur on Sundays or holidays. Thus, construction would occur when people are generally awake and would be less sensitive to vibration impacts. Further, construction activities would be temporary, and equipment would not operate in the same location for extended periods of time due to the linear nature of the project, therefore limiting vibration exposure to nearby receptors.

The project does not include vibration-intensive activities including pile drivers or blasting, would be limited to daytime hours, would be temporary in nature and cease once construction is complete, and is linear in nature thus would not expose receptors to long periods of vibration activity. The project would not occur within 26 feet of any vibration-sensitive structures (with respect to the prevention of structural damage). For these reasons, the project would not result in excessive groundborne vibration. Therefore, this impact would be **less than significant**.

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

No impact. The project is not located within an airport land use plan or within 2 miles of a public airport or public use airport. Additionally, the project is not located within 2 miles of a private airstrip. Cloverdale Airport, the closest airport, is located approximately 5 miles south of the project site. Also, the project would not include any new land uses where people would live. Thus, the project would have **no impact** regarding the exposure of people residing or working in the project site to excessive aircraft-related noise levels.

3.18 POPULATION AND HOUSING

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

3.18.1 Environmental Setting

The proposed project would be located along Geysers Road in northern Sonoma County, approximately 1.5 miles north of the city of Cloverdale; east of US 101, the Northwestern Pacific Railroad, and the Russian River. The City of Cloverdale is the closest city to the project site—with a small population of 8,809 (US Census 2022). The project site is currently undeveloped with rural residences and a campground in the immediate vicinity.

3.18.2 Discussion

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

No impact. The project does not involve the development of new housing or commercial businesses that could lead to direct population growth. Three new, formal river access areas and associated public amenities along Geysers Road would be created and connected by an approximately 1.75-mile-long connector path along the existing west shoulder of Geysers Road to provide access throughout the project site. The project would not create a new through road or extend transportation routes that could allow for the development of new housing or businesses. All of the new project features would be constructed to support existing public access within the project site and would not contribute to infrastructure that could lead to unplanned population growth. Therefore, the project would not result in direct or indirect unplanned population growth, and **no impact** would occur.

- b) **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

No impact. The project site is currently undeveloped and no housing is present. Therefore, the project would not displace existing people or housing and there would be **no impact**.

3.19 PUBLIC SERVICES

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

3.19.1 Environmental Setting

FIRE PROTECTION

Fire protection and emergency response services in Sonoma County is provided by a number of different agencies, including city fire departments, independent districts, and volunteer fire companies. Additional fire protection services in the unincorporated parts of the County are provided by the California Department of Forestry and Fire Protection (CAL FIRE). CAL FIRE is responsible for fire prevention and code enforcement services to enforce the California Fire Code and other fire-related codes and ordinances (Sonoma County 2020). The project site is in unincorporated Sonoma County and the State Responsibility Area (SRA); therefore, CAL FIRE has jurisdiction for wildland fire protection at the project site (Sonoma County 2014).

POLICE PROTECTION

The project site is served by the Sonoma County Sheriff's Office (SCSO). The SCSO provides police protection services in the County and is comprised of four major bureaus: Administrative Services, Enforcement, Custody, and Support Services (Sonoma County 2020). The Headquarters Patrol, a division of the Enforcement Bureau, provides 24-hour uniformed law enforcement patrol services to unincorporated portions of the County, which includes the project site (Sonoma County 2014). Currently, complaint-based ranger patrols occur within the project site as needed.

SCHOOLS

The closest schools to the project site are Jefferson Elementary School, Washington Middle School, and Cloverdale High School. All three schools are located in the city of Cloverdale, approximately 5 miles south of the project site, and are all a part of the Cloverdale Unified School District.

PARKS

The Russian River RV Campground (with a mix of 125 RV, tent, cottage, and cabin sites) is located on the southwest side of Geysers Road and between the Russian River and the project site. Other parks in the vicinity of the project site are between 3 to 5 miles south of the project site, including Cloverdale City Park, Vintage Meadows Park, and Porterfield Open Space Preserve.

3.19.2 Discussion

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

Fire protection?

Less than significant. The project would not be growth inducing and does not include the development of new residences requiring increased fire protection. The project may increase visitation to the project site through the development and formalization of public access features and amenities. However, the project site currently experiences visitation and implementation of the project would not substantially increase visitation such that new or expanded fire service would be required. In addition, the project would not result in new uses that could increase the occurrence of wildfire ignitions (e.g., campfires, all-terrain vehicle use). Therefore, the project would not result in the need for new or altered fire protection services and the impact would be **less than significant**.

Police protection?

Less than significant. The project would not be growth inducing and does not include the development of new residences requiring increased police protection. As described above under criterion a), the project may increase the number of visitors to the area over existing conditions; however, the increase would not be substantial relative to existing conditions. In addition, ranger patrols would continue to occur and there would be a seasonal on-site camp host, which may deter criminal activity during the high season. Therefore, the project would not result in the need for new or altered police protection services to accommodate the project and the impact would be **less than significant**.

Schools?

No impact. The project would not be growth inducing and does not include the development of new residences requiring increased school services. Because the project would not induce population growth, the project would not result in an increase in demand for educational services such that new or physically altered schools would be necessary to maintain current service levels. Therefore, **no impact** would occur.

Parks?

No impact. The project would not be growth inducing and does not include the development of new residences that could require the development of new parks. Furthermore, the project would improve public access and recreation at the project site. Therefore, **no impact** would occur.

Other public facilities?

No impact. The project would not be growth inducing and does not include the development of new residences. Because the project would not induce population growth, the project would not result in an increase in demand for other public facilities, such as libraries and community centers, and **no impact** would occur.

3.20 RECREATION

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. Recreation.				
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐

3.20.1 Environmental Setting

The project would be located along Geysers Road in northern Sonoma County, north of the city of Cloverdale; east of US 101, the Northwestern Pacific Railroad, and the Russian River. Currently, legal recreation such as camping, hiking, and river use occur in the vicinity of the project site, as well as illegal recreation and other prohibited activities (e.g., off-road vehicle use, illegal camping/encampments, dumping, vandalism). Recreational resources in the vicinity of the project site include the Russian River, the Russian River RV Campground, and Cloverdale River Park. As described above in Section 3.15, "Public Services," additional parks are located approximately 5 miles south of the project site, including Cloverdale City Park, Vintage Meadows Park, and Porterfield Open Space Preserve.

3.20.2 Discussion

- 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?**

No impact. The project would not induce population growth in the region or develop new residences which could lead to the increased use of existing neighborhood and regional parks or other recreational facilities. The project would enhance an existing recreation area by providing new and improved public access and recreation features, including trails, picnic areas, vault toilets, and formalized parking areas. The project would not increase the use of existing parks or cause a substantial physical deterioration to existing recreational facilities. Therefore, **no impact** would occur.

- b) **Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?**

Less than significant. The project includes the construction of public access and recreation features to support existing public use of the project site. The potential environmental effects of implementing these public access and recreation features are evaluated within this environmental document which determined that, with application of the mitigation measures identified herein, no significant environmental impacts would occur. Because impacts are addressed in other sections of this document, the impact here is considered **less than significant**.

3.21 TRANSPORTATION

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

3.21.1 Environmental Setting

ROADWAY NETWORK

Regionally, the unincorporated portions of Sonoma County are served by a roadway network consisting of freeways, urban principal arterials, rural principal arterials, urban minor arterials, rural minor arterials, urban major collectors, urban minor collectors, rural major collectors, rural minor collectors, and local roads. General descriptions of the roadways located in the vicinity of the project site and their intended function are provided below.

Highway System

The project site is served by US 101 which is operated and maintained by Caltrans. US 101, located west of the project site, is a north/south freeway extending from northern California to Los Angeles. US 101 is also known as the South Valley Freeway south of San Jose. In the vicinity of the project site, US 101 consists of four lanes and provides regional access to the project site.

County Roadways

The County's Roads Division of Sonoma Public Infrastructure operates and maintains approximately 1,380 roadways in unincorporated Sonoma County. Major County roadways are part of the regional roadway system and typically provide connections to the highway and freeway systems. Geysers Road is a county roadway and provides direct access to the project site. It is a bidirectional two-lane rural minor collector roadway that serves north/south travel in the vicinity of the project site between the US 101 interchange to the north and River Road to the south. Shoulders are marked on both sides of the roadway with a solid line and dashed striping in conflict areas; however, there are no bicycle-specific treatments in the vicinity of the project site (i.e., signage, bicycle markings) indicating that bicyclists likely share the roadway with vehicles. There are no pedestrian facilities present on Geysers Road.

Bicycle and Pedestrian Facilities

The bicycle network in Sonoma County is composed of bike paths, bike lanes, and bike routes. Bicycle facilities are classified in the Countywide Bicycle and Pedestrian Master Plan as follows:

- ▶ Class I (Bike Path): Provides a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross-flow of motorized traffic minimized;
- ▶ Class II (Bike Lane): Provides striped lane for one-way bike travel on a street or highway; and
- ▶ Class III (Bike Route): Provides shared use with pedestrians or motor vehicles.

As of 2014, Sonoma County had 319 total miles of bicycle facilities, including 91 miles of Class I, 167 miles of Class II, and 61 miles of Class III facilities (SCTA 2014:34). In the vicinity of the project site, a bicyclist could potentially utilize the shoulders along Geysers Road as a path of travel. However, due to the inconsistent width of the roadway shoulders, vegetation encroaching into the roadway shoulders in some areas, and uneven pavement the existing shoulders along Geysers Road, it does not provide a suitable path of travel for bicyclists. There are no sidewalks present in the vicinity of the project site.

TRANSIT SYSTEM

Sonoma County Transit (SCT) provides fixed route bus service in Sonoma County. The nearest bus service is offered in the City of Cloverdale south of the project site. The nearest stop is located at Champlain Avenue and Cloverdale Boulevard approximately 3.6 miles away. The Champlain Avenue and Cloverdale Boulevard stop is served by Route 68. Dial-a-ride, also known as paratransit or door-to-door service, is available to those registered and certified as Americans with Disabilities Act (ADA) eligible.

Sonoma-Marin Area Rail Transit (SMART) provides regional rail transit service in Sonoma and Marin counties. The Cloverdale Depot station, located over 3 miles away from the southern end of the project site, is planned and awaiting funding to be completed. The Cloverdale Depot station currently accommodates Amtrak Thruway bus service.

REGULATORY SETTING

Senate Bill 743 and CEQA

Senate Bill (SB) 743, passed in 2013, required the Governor's Office of Planning and Research (OPR) to develop new State CEQA guidelines that address traffic metrics under CEQA. As stated in the legislation, upon adoption of the new guidelines, "automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any."

These updates indicated that vehicle miles traveled (VMT) would be the primary metric used to identify transportation impacts. State CEQA Guidelines Section 15064.3 was added on December 28, 2018, to address the determination of significance for transportation impacts, which requires VMT be the basis of transportation analysis instead of congestion (such as LOS). The updated State CEQA Guidelines were approved and lead agencies had an opt-in period until July 1, 2020 to implement the updated guidelines regarding VMT. As of July 1, 2020, implementation of Section 15064.3 of the updated State CEQA Guidelines apply statewide.

State CEQA Guidelines Section 15064.3(b) identifies criteria for analyzing the transportation impacts of a project. Section 15064.3(b)(1) addresses land use projects and describes that those projects with specified proximity (i.e., 0.5-mile or less) to "major" or "high quality" transit should be presumed to cause a less-than-significant transportation impact. Additionally, Section 15064.3(b)(1) also describes that those projects resulting in a decrease in VMT in a project area as compared to existing conditions should also be presumed to have a less than significant effect. Section 15064.3(b)(3), "Qualitative Analysis," explains that there may be conditions under which a qualitative rather than quantitative analysis of VMT is appropriate. This section states that if existing models or methods are not available to estimate the VMT for the particular project being considered, a lead agency may qualitatively analyze VMT generated by a project. Additionally, this section notes that for many projects, a qualitative analysis of construction traffic may be appropriate. Section 15064.3(b)(4), "Methodology," explains that the lead agency has discretion to choose the most appropriate methodology to evaluate VMT subject to other applicable standards such as State CEQA Guidelines Section 15151 (standards of adequacy for EIR analyses).

In December of 2018, OPR published the most recent version of the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory), which provides guidance for VMT analysis. The 2018 Technical Advisory provides guidance related to screening thresholds for small projects to indicate when detailed analysis is needed or if a project can be presumed to result in a less-than-significant VMT impact. The Technical Advisory notes that projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact, absent substantial evidence indicating otherwise (OPR 2018).

Countywide Bicycle and Pedestrian Master Plan

The Countywide Bicycle and Pedestrian Master Plan is a document prepared by the Sonoma County Transportation Authority (SCTA) in partnership with its member jurisdictions including the unincorporated County. The plan identifies a vision for the bicycle and pedestrian network and proposes facility improvements and programmatic opportunities to increase walking and biking. The Countywide Bicycle and Pedestrian Master Plan was adopted in 2014 and was designed for periodic updates to the project list and map of existing and planned facilities included in Appendices A and B of the plan. The bike route map and project list were most recently updated in 2019. In the vicinity of the project site, the 2019 project list proposes Class II bicycle facilities along Geysers Road from the southern Mendocino County boundary to River Road.

3.21.2 Discussion

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

Less than significant. There are no existing or planned transit facilities in the vicinity of the project site. The Countywide Bicycle and Pedestrian Master Plan proposes a Class II bicycle facility along Geysers Road in the project site. As discussed in Section 3.17.1, "Environmental Setting," striping currently exists on both sides of Geysers Road; however, these lanes are not adequately signed, and the condition of the roadway does not make it safe for a bicyclist to ride within the dedicated space (i.e., varying lane width, encroachment of vegetation on to the roadway, uneven surface).

The project includes the construction of a 1.75 mile, 6- to 8-foot-wide connector path between all three proposed access areas that would be located along the west shoulder of Geysers Road. At a minimum, the pathway would be designed to meet the Forest Service Trail Accessibility Guidelines (FSTAG). The FSTAG provides guidance for maximizing accessibility of trails in the National Forest System, while protecting the unique characteristics of their natural setting. FSTAG incorporates the Outdoor Developed Area Accessibility Guidelines, a supplement to the Architectural Barriers Act Accessibility Standards, and include more stringent guidelines to comply with other existing Forest Services policies (USDA 2013:3). Therefore, the project would provide an improved bicycle and pedestrian pathway that would enhance safety for bicyclists and pedestrians accessing the project, and it would not impede the future development of the Class II bicycle facility proposed in the Countywide Bicycle and Pedestrian Master Plan.

For these reasons, the project would not adversely affect any existing or planned transit, bicycle, or pedestrian facility, or conflict with a program, plan, ordinance, or policy addressing pedestrian, bicycle, transit, or roadway facilities. Therefore, the impact would be **less than significant**.

b) Conflict or be inconsistent with State CEQA Guidelines Section 15064.3(b), which pertains to vehicle miles travelled?

Construction

As detailed in Chapter 2, "Project Description," project construction would be completed by up to two crews working simultaneously consisting of 5-10 personnel in each crew. The VMT of construction workers is not newly generated; instead, it is redistributed throughout the regional roadway network based on the different work sites in which workers travel to each day. Therefore, construction workers are not generating new VMT each day, only redistributing it. Additionally, even if the trips generated during project construction were considered to be new trips, construction workers are expected to generate a total of 20-40 average daily trips, assuming that construction workers would not carpool and

would generate two trips per worker per day. Therefore, the number of daily construction trips generated would be fewer than 110 trips per day; thus, satisfying the screening threshold for small projects as detailed in the OPR Technical Advisory. Therefore, construction activities are not expected to significantly increase VMT in the region.

Operations

Sonoma County has not yet developed local guidance pertaining to the changes reflected in SB 743 (i.e., shift from LOS to VMT analysis under CEQA). Therefore, the screening criteria and thresholds recommended in OPR's Technical Advisory are appropriate for this analysis and were utilized to analyze the project's effect on VMT (Oh, pers. comm., 2021).

As detailed in Chapter 2, "Project Description," the project site, which includes the three new access areas and connector path, is approximately 25 acres in total. The number of new trips that would be generated by the project was estimated using the Institute of Transportation Engineers (ITE) Trip Generation Manual 11th edition (ITE 2021).

The ITE Trip Generation Manual (11th Edition) provides weekday, Saturday, and Sunday average daily trip generation rates for the land use category "Public Parks" (ITE Land Use Code 411). As defined in the ITE Trip Generation Manual, public parks are defined as being owned and operated by a municipal, county, state, or federal agency, and could include boating or swimming facilities, beaches, hiking trails, ball fields, soccer fields, campsites, and picnic facilities. Table 3.21-1 shows the weekday, Saturday, and Sunday daily trip generation rates for the "Public Parks" land use category.

Table 3.21-1 Project Trip Generation Rates

Land Use	ITE Land Use Code	Quantity	Weekday Daily Trip Rate	Saturday Daily Trip Rate	Sunday Daily Trip Rate
Public Parks	411	Acres	0.78	1.96	2.19

Source: ITE Trip Generation Manual 2021.

To provide a conservative estimate of the number of average daily trips potentially generated by the project, the highest daily trip rate from Table 3.21-1 (i.e., Sunday daily trip rate) was utilized to estimate the number of average daily trips for the purpose of this analysis. Therefore, based on the Sunday daily trip rate shown in Table 3.21-1 above, the project is estimated to generate approximately 55 trips per day.

Additionally, the project proposes five RV parking stalls in Access Area 1 and four RV parking stalls in Access Area 3. Assuming that each RV would generate the most trips on the weekends at a rate of two trips per day, RVs would account for an additional 18 trips per day. Therefore, it is conservatively estimated that the project could result in a total of 73 new daily trips. Using OPR guidance, because the project would generate fewer than 110 trips per day the screening threshold for small projects as detailed in the OPR Technical Advisory would not be exceeded. In addition, the project site experiences visitation under existing conditions. Thus, project operations would not significantly change VMT in the region.

Summary

The construction and operational activities of the project would each generate fewer than 110 daily trips; and thus, the project meets the screening criteria established in the OPR Technical Advisory which states that projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact. In addition, the project site experiences visitation under existing conditions. For these reasons, the project would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3(b). This impact would be **less than significant**.

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

Less than significant with mitigation incorporated.

Construction

The project site would be accessed from Geysers Road via US 101 on the north end of the project site and via River Road on the south end of the project site, and construction staging would be located in previously disturbed areas near each access point.

The project would construct traffic calming features along Geysers Road, northbound and southbound approaching Access Area 1 and northbound approaching Access Area 3. Additionally, the project would include the construction of a 1.75-mile connector path along the west side of Geysers Road that may encroach upon the roadway right-of-way. Because construction would occur adjacent to and within the existing roadway right-of-way, potential lane closures could occur during construction and Regional Parks may need to obtain an encroachment permit from the County Department of Transportation and Public Works and demonstrate planned traffic handling during construction activities. In addition, the project would be required to comply with all County and State safety standards during construction, including California Department of Industrial Relations Division of Occupation Safety and Health (Cal/OSHA) and Caltrans regulatory guidelines, as necessary. However, because construction activities would encroach upon the roadway right-of-way and could lead to lane closures, potential conflicts between different modes of transportation (e.g., vehicles, bicyclists, and pedestrians) may occur. Therefore, the project could result in transportation hazards during construction.

Operations

The project involves the formalization of three access areas to the Russian River, including new and improved trails, picnic facilities, parking areas, vault toilets, and a connector path along Geysers Road. Each access area would include gravel parking areas on each side of the roadway and Access Areas 1 and 3 would accommodate RVs. Access Areas 2 and 3 would prohibit public parking on portions of Geysers Road due to inadequate sight distance. Additionally, as detailed in Chapter 2, "Project Description," signage would be installed to communicate parking restrictions in these areas. Pedestrian safety while accessing the parking areas on the east side of Geysers Road would be improved through the implementation of traffic calming measures to reduce vehicle speeds and minimize potential conflicts. In addition, the new connector path would enhance pedestrian and bicycle access and safety between the three access areas in the project site by providing a dedicated path separate from the roadway. Portions of the trail may use the existing pavement shoulder where the area between the roadway edge and the top of the slope is too narrow to accommodate the path. Traffic calming measures and signage would be used on Geysers Road in these areas. Furthermore, the parking areas, connector path, and traffic calming features would be required to comply with all County design standards contained in the County of Sonoma Construction Standards and applicable municipal codes including those found in Article IV "Design Standards Generally," Section 25-40 "Streets and Highways." The project would also be subject to design review by County staff ensuring hazards related to transportation would be minimized and that the project would meet regulatory provisions regarding adequate sight distance at all access points. Therefore, the project would not result in any substantial transportation hazards during operations.

Summary

The project would be required to follow County and State safety protocols during construction and operations and meet County design standards and regulations. Additionally, the project would be subject to review by the County; thus, minimizing hazards during operations of the project. However, construction activities may obstruct vehicle, bicycle, and pedestrian movement and require lane closures. Therefore, the project could increase roadway hazards during construction and the impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure TRAN-1: Develop Traffic Control and Management Plan

A Traffic Control and Management Plan shall be prepared, and address all means to minimize temporary impacts from roadway and travel lane disruptions. The Traffic Control and Management Plan shall be submitted to and approved by the County of Sonoma prior to construction to minimize project impacts on local streets, highways, freeways, and other forms of transportation. The Traffic Control and Management Plan shall be developed in coordination with the County and at a minimum contain the following:

- ▶ describe the proposed work zone;
- ▶ delineate construction areas in a manner that protects vehicles, bicyclists, and pedestrians;
- ▶ provide for safe vehicular, pedestrian, and bicycle travel approaching and within the construction area;

- ▶ describe applicable detours and lane closures;
- ▶ describe appropriate tapers and lengths, signs, and spacing;
- ▶ identify appropriate channelization devices and spacing;
- ▶ identify work hours and workdays;
- ▶ identify proposed speed limit changes if applicable;
- ▶ describe any intersections that would be affected by the work;
- ▶ describe the trucks that would be used during construction, including the number and size of the trucks used per day, their expected arrival and departure times, their general weight and size, and circulation patterns;
- ▶ identify all staging areas;
- ▶ provide a description and/or documentation of the pavement conditions along the roadways used to access the site before the commencement of construction and at the conclusion of construction;
- ▶ coordinate with the County to determine how any potential pavement damage directly resulting from construction of the project would be mitigated;
- ▶ require that access to all surrounding parcels and properties be maintained at all times;
- ▶ require that adequate emergency vehicle access to all surrounding parcels and properties be maintained at all times; and
- ▶ where the project work area encroaches on a public right-of-way and reduces the existing pedestrian path of travel to less than 48 inches wide, alternate pedestrian routing shall be provided during construction activities.

Significance after Mitigation

Mitigation Measure TRAN-1 would avoid and minimize adverse traffic hazards to vehicles, pedestrians, and bicyclists during project-related construction activities by requiring the preparation of a Traffic Control and Management Plan prior to construction, which would implement measures such as delineating construction areas in a manner that protects vehicles, bicycles, and pedestrians and describes appropriate tapers and lengths, signs, and spacing. Additionally, the project would be subject to review by the County minimizing hazards during operations of the project. Therefore, with implementation of Mitigation Measure TRAN-1, the impact related to hazards due to geometric design features or incompatible uses would be **less than significant with mitigation incorporated**.

d) Result in inadequate emergency access?

Less than significant with mitigation incorporated. As described in criterion c) above, the project could potentially increase hazards during construction due to lane closures and transportation conflicts. This could include temporary impacts to emergency access due to potential vehicular lane closures and heavy equipment being present along Geysers Road. Therefore, the project could result in inadequate emergency access during construction and the impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure TRAN-1: Develop Traffic Control and Management Plan

Significance after Mitigation

Implementation of Mitigation Measure TRAN-1, detailed in criterion c) above, would require the development of a Traffic Control and Management Plan prior to construction, which would ensure adequate emergency vehicle access to the project site and all surrounding parcels and properties be maintained at all times. With the implementation of Mitigation Measure TRAN-1, the project would not result in inadequate emergency access; therefore, the impact would be **less than significant with mitigation incorporated**.

3.22 TRIBAL CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. Tribal Cultural Resources.				
Has a California Native American Tribe requested consultation in accordance with Public Resources Code Section 21080.3.1(b)?	☒ Yes	☒ Yes	☐ No	☐ No
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	☒	☐	☐
b) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

3.22.1 Environmental Setting

TRIBAL CULTURAL RESOURCE SETTING

The project site is within the general area that was inhabited by the Southern Pomo Tribe. The Southern Pomo were one of several groups of Pomo Indians distributed over the lands of Mendocino, Lake, and Sonoma Counties. Seven distinct languages are recognized under the rubric of Pomo. Southern Pomo speakers occupied central to southern Sonoma County, from the coast to the Russian River, extending just south of Gualala in the north, to Sebastopol in the south. Little is known of Southern Pomoan culture, as their population was decimated early by missionization, slave raids, massacres, and disease (Alta Archaeological 2020).

The Southern Pomo living in the Cloverdale region had villages situated along the shores of the Russian River, taking advantage of the rich resources of the river and surrounding valley. They primarily subsisted on freshwater fish, acorns, and game. Ethnographic accounts report that there were multiple villages around the Russian River where it runs through northern Alexander Valley. The eponymous village was the chief village in their territory, and was situated on either side of the mouth of Sulphur Creek on the east side of Russian River. No ethnographically described resources are situated within the current project site (Alta Archaeological 2020).

The majority of the villages in Cloverdale region were situated along the shores of the Russian River, taking advantage of the rich resources of the river and surrounding valley. However, no ethnographically described resources are situated within the current project site (Alta Archaeological 2020).

ASSEMBLY BILL 52 CONSULTATION

Assembly Bill (AB) 52 (Statutes 2014) establishes a formal consultation process for California Indian tribes as part of CEQA and equates significant impacts on Tribal Cultural Resources (TCRs) with significant environmental impacts. TCRs, as defined in PRC Section 21074, include site features, places, cultural landscapes, sacred places or objects, which are of cultural value to a tribe. Several new PRC sections have been written to codify the law's requirements. PRC Section 21080.3.2 provides that if the California tribe requests consultation to include project alternatives and mitigation measures, such consultation would be required; PRC Section 21082.3 provides that any mitigation measures agreed upon during consultation shall be recommended for inclusion in the environmental document and affirms the lead agency's obligation to keep confidential any information obtained from a Native American tribe during the consultation process; and, PRC Section 21083.4 provides examples of mitigation measures for impacts to TCRs.

In accordance with AB 52, Regional Parks sent letters via certified mail to Native American tribal contacts on July 2, 2020. Regional Parks sent letters to the following tribal contacts: Patricia Hermosillo, chairperson, Cloverdale Rancheria of Pomo Indians Tribal Band; Chris Wright, chairperson, Dry Creek Rancheria of Pomo Indians Tribal Band; Greg Sarris, chairperson, Federated Indians of Graton Rancheria Tribal Band; Merlene Sanchez, chairperson, Guidiville Indian Rancheria Tribal Band; Loren Smith, Tribal Historic Preservation Officer, Kashia Band of Pomo Indians of the Stewarts Point Rancheria Tribal Band; Dino Franklin, chairperson, Kashia Band of Pomo Indians of the Stewarts Point Rancheria Tribal Band; Marjorie Mejia, chairperson, Lytton Rancheria Tribal Band; Jose Simon, chairperson, Middletown Rancheria of Pomo Indians Tribal Band; and Scott Gabaldon, chairperson, Mishewal-Wappo Tribe of Alexander Valley Tribal Band.

Since the letters were sent, one response was received by the Cloverdale Rancheria of Pomo Indians Tribal Band. The Tribal Office requested additional information regarding the cultural and biological resources studies for the site. At a meeting on July 13, 2021, Cloverdale Rancheria of Pomo Indians acknowledged that Regional Parks would provide notification prior to conducting geotechnical exploration and other ground-disturbance activities at site. Following the meeting, an email was sent with PDF exhibits showing proposed boring locations to provide notification for geotechnical exploration at site. The email was sent on August 23, 2021, three weeks prior to anticipated start of activities. All borings were completed in September 2021. In August 2023 Regional Parks followed up, requesting a tribal contact to receive subsequent project documents, which the Tribe provided. During this consultation period, the Cloverdale Rancheria of Pomo Indians Tribal Band did not identify any TCRs as defined by PRC Section 21074.

3.22.2 Discussion

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

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

Less than significant with mitigation incorporated. No TCRs, as defined by PRC Section 21074, are known to occur on the project site. However, the project site is known to have included Native American use and there is a potential for unknown TCRs to be present within the project site. Ground-disturbing construction activities could damage or destroy TCRs if encountered, which would be a **potentially significant** impact.

Mitigation Measures

Mitigation Measure CUL-1: Implement Measures to Protect Cultural and Tribal Cultural Resources

Significance after Mitigation

Implementation of Mitigation Measure CUL-1 would reduce impacts to any unknown TCRs discovered during construction. Per Mitigation Measure CUL-1, if a precontact archeological site is uncovered during construction activities, Regional Parks would be required to halt all ground-disturbing activity within 50 feet of the discovery until a qualified archaeologist can assess the find. Depending on the significance and type of find, specific actions would be implemented, which could include notification of the culturally affiliated tribe and resource documentation using the appropriate California Department of Parks and Recreation 523 forms. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, and analyzes and interprets the results. Regional Parks would implement all project-specific protective measures recommended by the qualified archaeologist in coordination with the culturally affiliated tribe. In addition, if any human remains are exposed during construction, they shall be treated in accordance with the California Health and Safety Code and California PRC Sections 5097.94 and 5097.98, in consultation with the Native American Heritage Commission.

With implementation of Mitigation Measure CUL-1, the project would not cause a substantial adverse change in a TCR that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources, as defined in PRC Section 21074. Therefore, the impact would be clearly reduced to **less than significant with mitigation incorporated**.

- b) **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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

Less than significant with mitigation incorporated. Although no TCRs are known to occur within the project site, there is a potential for unknown TCRs to be present within the project site, which could be encountered by ground-disturbing project activities. This would be a **potentially significant** impact.

Mitigation Measures

Mitigation Measure CUL-1: Implement Measures to Protect Cultural and Tribal Cultural Resources

Significance after Mitigation

As described above under criterion a), if any precontact archeological sites or historic-period archaeological sites are uncovered during construction activities, Mitigation Measure CUL-1 would be implemented. Pursuant to Mitigation Measure CUL-1, Regional Parks would immediately halt work and adhere to all professionally accepted and legally compliant procedures regarding the treatment of archaeological resources that may be TCRs identified by culturally affiliated tribes. Refer to criterion a) above for more detail regarding Mitigation Measure CUL-1. Therefore, the impact would clearly be **less than significant with mitigation incorporated**.

3.23 UTILITIES AND SERVICE SYSTEMS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. Utilities and Service Systems.				
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

3.23.1 Environmental Setting

SOLID WASTE

The Sonoma County Department of Environmental Health and Safety (DEHS) Solid Waste Program is certified by the California Department of Resources, Recycling, and Recovery (CalRecycle) as the Local Enforcement Agency (LEA) for the unincorporated areas of Sonoma County. The DEHS regulates solid waste facilities and landfills to ensure compliance with state standards and is also responsible for permitting and inspecting landfills, transfer stations, composting facilities, and refuse collection vehicles and yards (Sonoma County 2020).

There are four transfer stations within the County (Healdsburg, Annapolis, Guerneville, and Sonoma) and the Central Landfill. The Central Landfill, a 398-acre waste disposal site operated by Republic Services of Sonoma County, is located approximately 44 miles south of the project site in Petaluma. The landfill accepts non-hazardous solid waste including construction and demolition debris, wood waste, industrial and special waste, and municipal solid waste (Sonoma County 2020). It is currently active with a remaining capacity of 9,085,715 cubic yards and cease operations date of February 1, 2039 (CalRecycle 2019).

The Sonoma County Waste Management Agency (SCWMA) Board of Directors adopted the Zero Waste Resolution on September 2018 and requested that SCWMA staff collaborate with member jurisdictions to present the Zero Waste Resolution to SCWMA member agencies for their consideration (Sonoma County 2021b). In August 2021, the County of Sonoma Board of Supervisors adopted a resolution with the goal of achieving zero waste in Sonoma County by 2030, consistent with objectives of the Climate Action and Resiliency pillar of the County's Five-Year Strategic Plan to reduce consumption emissions, conserve energy and decrease methane emissions from landfills (Sonoma County 2021b). While the resolution does not require specific goals to be met by jurisdictions, it creates a framework to pursue actions that reduce waste, promote the best and highest use of materials, support sustainable consumption, and endorse resource conservation. The jurisdictions in Sonoma County have collectively adopted regional goals for waste reduction, reuse, and recycling, which are detailed in Countywide Integrated Waste Management Plan as well as the Sonoma County Regional Climate Action Plan.

WASTEWATER TREATMENT

In 1995, Sonoma Water assumed responsibility from the County of Sonoma for managing the County sanitation zones and districts, which provide wastewater collection/treatment, and recycled water distribution/disposal services for approximately 22,000 residences and businesses. The zones include Airport/Larkfield/Wikiup, Geyserville, Penngrove and Sea Ranch. The sanitation districts include the Occidental, Russian River, Sonoma Valley, and South Park County Sanitation Districts (Sonoma Water 2021a).

There are several wastewater treatment plants (WWTPs) in Sonoma County. Wastewater from the project would likely be disposed of at the Russian River Utility WWTP. The Russian River Utility WWTP has two reservoirs with a combined capacity of 4.5 million gallons that are used to store recycled water from the tertiary filters. The recycled water is transported directly from the 3.5 million-gallon holding pond to the seasonal discharge locations. The WWTP has a design capacity of approximately 710,000 gallons per day (average daily dry weather flow, treats wastewater to tertiary treatment levels, and has one noted location of a potential surcharge deficiency) (Sonoma Water 2021b).

3.23.2 Discussion

- a) **Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?**

Less than significant. The project includes the construction of four vault toilets and one hookup to existing electrical power lines to accommodate the seasonal site host. The vault toilets would be constructed on a concrete platform with basins extending up to eight feet below ground to capture and contain wastewater. A third-party contractor would service the vault toilets to remove wastewater and they would not require any water or sewer hookups. The season site host area would include one electrical hook up that would tie into a nearby power line and would not require the construction of new or expanded electric power facilities. No other utilities are proposed by the project. Therefore, the project would not require the relocation or construction of new or expanded utilities and the impact would be **less than significant**.

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

No impact. The project does not include permanent or ongoing use of existing water supplies. The restrooms on-site would be vault toilets which would not require any water utility connections. Therefore, **no impact** to existing water supplies would occur.

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

Less than significant. Four vault toilets would be constructed by the project, which would result in the generation of wastewater. While no utility connections would be required for the vault toilets, a third-party contractor would service the vault toilets. The third-party contractor would be required to apply for a liquid waste pumper permit from Sonoma County through their Septic Disposal Program to operate a pumping vehicle designed to siphon and transport septage from the vault toilet. As required by the liquid waste pumper permit, the amount of wastewater pumped and the location where the wastewater is dumped must be recorded by the third-party contractor and reported regularly to Sonoma County. As described above under "Wastewater Treatment," wastewater from the project would likely be disposed of at the Russian River Utility WWTP. The wastewater generated by four vault toilets and requiring treatment and disposal would be a fraction of the WWTP's wastewater treatment capacity of approximately 710,000 gallons per day and would not cause the WWTP to determine that it has inadequate capacity to treat wastewater. Therefore, the impact would be **less than significant**.

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

Less than significant. Construction of the proposed project would generate a small amount of solid waste. Much of the waste would be construction debris, such as removed asphalt and vegetation, as well as waste generated by construction workers. The generation of construction waste would be temporary, would cease when construction is complete, and would not be substantial. Once operational, visitors to the project site would generate a small amount of solid waste, such as food and beverage waste, which would be deposited in trash receptacles located through the project site. Solid waste generated during construction and operations would be recycled and/or disposed of at the Central Landfill. As described above under "Solid Waste," the landfill has a remaining capacity of over 9 million cubic yards and cease operations date in year 2039. The project would not generate solid waste in excess of state or local standards or in excess of the capacity of the local landfill; therefore, the impact would be **less than significant**.

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

Less than significant. As described above under "Solid Waste," the County of Sonoma Board of Supervisors adopted a resolution with the goal of achieving zero waste in Sonoma County by 2030. While the resolution does not require specific goals to be met by jurisdictions, it creates a framework for local management, statutes, and regulations to reduce waste, promote the best and highest use of materials, support sustainable consumption, and endorse resource conservation. As described above under criterion d), the project would generate small quantities of solid waste. The generation of construction waste would be temporary, would cease when construction is complete, and would not be substantial. Once operational, the project would provide public access and recreation to the Russian River. Small quantities of solid waste may require off-site disposal or recycling from visitation (e.g., food and beverage waste); however, the amount of waste generated at the site would not change considerably from existing conditions. The project would be consistent with the County's current zero waste resolution and all other regulations related to solid waste. Therefore, the impact would be **less than significant**.

3.24 WILDFIRE

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

3.24.1 Environmental Setting

Areas in Sonoma County are considered “high or extreme fire hazard areas” due to the combination of highly flammable fuel, long dry summers, and steep slopes that create conditions conducive to large wildland fires (Sonoma County 2014). CAL FIRE has assessed wildland fire hazards in different areas of the County based on wildland fuels, terrain, weather, and other relevant factors. Woodland fuels or vegetation are the basic catalyst that supports the combustion process of wildfires. Various fuel types have specific characteristics which allow fire behavior analysts to categorize them based on how they burn. CAL FIRE’s mapping indicates that the project site is within a Moderate and Very High Fire Hazard Severity Zone (CAL FIRE 2023). A Very High Fire Hazard Severity Zone is defined as wildland areas supporting high to extreme fire behavior resulting from well-developed surface fuels and forests where fire in tree crowns (portions of trees above the trunks) is likely. Additional considerations include steep and mixed topography and seasonally extreme conditions of strong winds and dry fuel.

Local firefighting agencies have the primary responsibility of responding to incidents in areas designated as the Local Responsibility Area (LRA). In the State Responsibility Area (SRA), CAL FIRE has the primary responsibility for responding to wildfires (Sonoma County 2014). The project site is located within the SRA and CAL FIRE would be responsible for responding to a wildfire at the project site. The project site is within the CAL FIRE Sonoma-Lake-Napa Unit, and fire management efforts are guided by the Sonoma Lake Napa Unit Fire Management Plan. CAL FIRE wildfire statistics for 2020 show that there was a total of seven wildfires in Sonoma County, five of which were larger than 100 acres (CAL FIRE 2021).

3.24.2 Discussion

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

Less than significant. As described under criterion f) in Section 3.9, "Hazards and Hazardous Materials," the proposed project features would not obstruct Geysers Road or otherwise impair emergency access or evacuation to or from the project site. In addition, the project must be reviewed and approved by the Sonoma County Fire Marshal's Office (Fire Marshall) prior to construction to confirm that for any type of emergency, emergency services will be able to reach the project site quickly and safely in any conditions and have room to operate their equipment. The project would therefore have a **less-than-significant** impact related to impairing the implementation of an emergency response plan.

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

Less than significant. The project site consists of vegetative habitats, such as ruderal, non-native annual grassland, chaparral, riparian woodland, pine woodland, mixed oak and bay woodland, and is designated as a Moderate and Very High Fire Hazard Severity Zone (CAL FIRE 2023). Although fires are a natural occurrence in the vegetation that comprises the project site, human activities, such as vehicle and equipment use, may cause fires to occur more frequently than they otherwise would. During project construction, the use of vehicles and equipment throughout the project site could increase the risk of wildfire ignitions. However, construction would be temporary, and there would be no project occupants or other visitors using the project site during construction. In addition, internal combustion equipment would be required to be equipped with a spark arrester maintained in effective working order when working on any forest-covered, brush-covered, or grass-covered lands, consistent with PRC Section 4442.

Once operational, the project may increase visitation to the project site, which could increase the potential for ignitions in the area. However, only low intensity recreation would be permitted and no activities that could inherently increase wildfire risks would occur (e.g., campfires, all-terrain vehicle use). In addition, vegetation would be maintained around the parking areas and throughout the project site, which would reduce risks related to wildfire. Furthermore, there would be no residents or project occupants present on the project site. For the reasons described above, the impact would be **less than significant**.

c) Require the installation 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?

No impact. The project does not require the installation of infrastructure such as roads, fuel breaks, emergency water sources, power lines, or other utilities that could exacerbate fire risk. The project involves the formalization of parking areas and trails, and the construction of new amenities, such as vault toilets and picnic areas, and one season site host with a simple aboveground hookup to an existing power line. These project features would not exacerbate fire risk. Therefore, there would be **no impact**.

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

Less than significant. The project would result in new and improved public access features and may increase visitation to the project site, which could potentially expose people and structures to risks from flooding or landslides due to runoff, post-fire slope instability, or drainage changes. However, as described under criteria b) and c) above, the project would not substantially exacerbate fire risk. Therefore, no substantial post-fire slope instability would occur. In addition, as described under criteria c) and d) in Section 3.10, "Hydrology and Water Quality," the project would not substantially alter drainage or expose people to risks related to runoff or floods. Furthermore, as described under criterion a) in Section 3.7, "Geology and Soils," the project would not expose people to significant risks related to landslides. Therefore, no substantial risks related to runoff, post-fire slope instability, or drainage changes would occur and the impact would be **less than significant**.

3.25 MANDATORY FINDINGS OF SIGNIFICANCE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. Mandatory Findings of Significance.				
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 an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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.)	☐	☐	☒	☐
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

3.25.1 Discussion

- 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 an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?**

Less than significant with mitigation incorporated (important examples of California prehistory and certain biological resource effects); Less than significant (for all other topics). As described in Chapter 2, "Project Description," no work within the waters of the Russian River would occur, and all construction laydown, staging, and activity would occur outside of the FEMA floodplain associated with the Russian River. As a conservative estimate, it is assumed that the project would result in up to 4 acres of total ground disturbance; however, much of this would take place on previously disturbed areas. Project construction would involve the use of vehicles and heavy machinery and would result in ground disturbance; these activities could result in inadvertent erosion, sedimentation, and polluted runoff entering nearby waters. However, the installation of temporary erosion control BMPs (e.g., waddles, silt fencing) according to the required SWPPP for the project would prevent erosion, sedimentation, and runoff of contaminants and associated indirect impacts to waters from construction above the top of the bank of the river. Following construction, disturbed areas and unstable slopes would be hydroseeded and trees would be planted to replace those removed according to local requirements. In addition, a botanical survey of the project site conducted during the blooming period for special-status botanical species with potential to occur in the project site did not identify any special-status plants (Appendix B).

The project has the potential to adversely affect sensitive natural communities. The proposed realignment of the southeasternmost portion of the trail in Access Area 3 could result in loss of a small area of Torrey's melic grass grassland that was identified on the project site (Appendix B), which is designated as a sensitive natural community by CDFW. However, Mitigation Measure BIO-7 would be implemented to avoid and minimize impacts to Torrey's melic grass grassland by mapping Torrey's melic grass grassland within the project site and compensating for any loss. Habitat would either be replaced within the project site, another Regional Parks property within the Russian River watershed, or at an approved mitigation bank.

The project also has the potential to adversely affect special-status fish, amphibians and reptiles, nesting raptors, special-status bats, ringtail, and common nesting birds. Impacts to these wildlife species could occur as a result of runoff from ground-disturbing construction activities; large equipment use resulting in accidental crushing of individuals; entrapment in trenches; and disturbances to nests of raptors and common nesting birds, bat roosts, and ringtail dens from noise, human presence, and vegetation removal. However, several mitigation measures have been incorporated into the project that would clearly reduce these potential impacts to less-than-significant levels. Mitigation Measure BIO-1 requires the stoppage of ground-disturbing activities below the top of the bank of the Russian River during rains or when soil is saturated to avoid contaminated runoff reaching habitat for special-status fishes. Mitigation Measure BIO-2a requires environmental worker awareness training for all construction workers related to the identification and protection of special-status species; Mitigation Measure BIO-2b requires pre-construction surveys for special-status amphibians and reptiles and the implementation of specific measures to avoid species if present; Mitigation Measures BIO-3, BIO-4, BIO-5, and BIO-6 require pre-construction surveys and specific measures to avoid nesting eagles, bat roosts, ringtail dens, and common nesting birds, respectively, including species-specific no-disturbance buffers.

Therefore, with implementation of Mitigation Measure BIO-1, BIO-2a, BIO-2b, BIO-3, BIO-4, BIO-5, BIO-6, and BIO-7, the project would not substantially degrade wildlife habitat, adversely affect wildlife populations, or restrict the range of special-status species. Therefore, the project would have a **less than significant impact with mitigation incorporated**.

As described in Section 3.5, "Cultural Resources" criteria a) and b), and Section 3.18, "Tribal Cultural Resources" criteria a) and b), ground-disturbing construction activities would have the potential to damage cultural and tribal cultural resources if present in the project site. However, Regional Parks would implement Mitigation Measure CUL-1 to avoid and minimize impacts to previously undiscovered cultural and tribal cultural resources from ground disturbance. Per Mitigation Measure CUL-1, if a precontact archeological site or a historic-period archaeological site is uncovered, Regional Parks would be required to halt all ground-disturbing activity within 50 feet of the discovery until a qualified archaeologist can assess the find. Any previously undiscovered resources found during construction will be recorded on appropriate California Department of Parks and Recreation 523 forms and evaluated for significance under all applicable regulatory criteria. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), the archaeologist shall work with the Regional Parks to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. Depending on the significance and type of find, specific actions would be implemented, which could include consultation with the affiliated Native American tribe if the discovery is a precontact archeological site. The tribal representative would make recommendations for culturally appropriate treatment, which may include preservation in place, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, or returning objects to a location within the project vicinity where they will not be subject to future impacts. With implementation of Mitigation Measure CUL-1, the project would not risk the elimination of important examples of the major periods of California history or prehistory. The impact would clearly be **less than significant with mitigation incorporated**.

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

Less than significant. In accordance with CEQA (State CEQA Guidelines Section 15130) this Initial Study analyzes the cumulative impacts of the project. A cumulative impact is when “two or more individual effects which, when considered together, are considerable or which compound or increase environmental impacts” (State CEQA Guidelines Section 15355).

Methods

Cumulative Scenario

To comply with CEQA, a cumulative scenario has been developed that identifies and evaluates past, present, and reasonably foreseeable future projects within the defined cumulative study area that would be constructed or commence operation during the timeframe of activity associated with the project. In discussing cumulative impacts, the State CEQA Guidelines outline two approaches for characterizing the projects that may occur in the vicinity of a project:

- ▶ **Project list:** A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, projects outside the control of the agency (State CEQA Guidelines Section 15130(b)(1)(A)).
- ▶ **Summary of Projections:** A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect (State CEQA Guidelines Section 15130(b)(1)(B)). This summary can be supplemented with additional information, including a regional modeling program.

This document uses both approaches, depending on which one is most appropriate for the resource area being analyzed. The rationale for selecting an approach is provided in the cumulative impact discussion for each resource area. Because the area within which a cumulative impact can occur varies by resource area, for the purposes of this analysis, the geographic boundary also varies by the resource being evaluated. For example, traffic and noise impacts tend to be localized, while air quality and GHG impacts can be more widespread.

Projects Considered

Projects considered include past projects, projects under construction and approved, pending projects that are anticipated to be either under construction or operational by the time of the completion of the proposed project, and reasonably foreseeable future projects. Information pertaining to past, present, and reasonably foreseeable future projects was obtained by reviewing projects undertaken or under review by Regional Parks and by reviewing the projects undertaken by the following agencies:

- ▶ Sonoma County General Services Department
- ▶ Sonoma County Regional Parks
- ▶ Sonoma County Department of Transportation and Public Works
- ▶ Sonoma County Water Agency
- ▶ State Water Resources Control Board

As shown in Table 3.25-1, seven projects are considered for cumulative analysis purposes and are included in the cumulative scenario for impacts evaluated using the project-list approach.

Table 3.25-1 Cumulative Projects List

No.	Project Name	Agency	Description	Status/Timing	Location
1	Sonoma County Integrated Parks Plan (SCIPP)	Sonoma County Regional Parks	The SCIPP is a strategic plan that establishes a vision to guide the ongoing and future work of the Regional Parks system. The four main goals of the plan are to: conserve and protect natural and cultural resources; ensure access for all to the County's recreational resources; promote physical, mental, and community health; and improve the vitality of the outdoor recreation economy in the County.	Ongoing activities to enhance County Park and trail facilities through road and trail maintenance and improvements to and expansions of existing programs, features, and park amenities.	All Regional Parks lands, including the project site.
2	Russian River Summer Crossings Project	Sonoma Public Infrastructure	Sonoma Public Infrastructure (formerly the Sonoma County Department of Transportation and Public Works) proposes to continue installation and removal of three summer crossings across the Russian River. The purpose of the project is to provide local access to residents and improve emergency access during the summer months. The summer crossings are located at Washington School Road near Asti, Vacation Beach Avenue at Vacation Beach, and Odd Fellows Road in Guerneville. The crossings consist of temporary bridges that span the low-flow channel of the Russian River and gravel roads that are constructed over the remainder of the channel to connect with the bridge.	CEQA was completed in 2002. The three temporary crossings are rebuilt and torn down annually. Permanent solutions are under evaluation.	Extends from Asti to Guerneville. At its closest point, this project is approximately 7 miles south of the project site.
3	Geysers Road over Big Sulphur Creek Bridge Replacement Project	Sonoma Public Infrastructure	Sonoma Public Infrastructure proposes to replace the existing bridge on Geysers Road over Big Sulphur Creek, east of Cloverdale. The existing bridge will be replaced with a 32-foot wide three-span concrete box girder bridge. The new bridge will be on a new alignment downstream of the existing bridge. The existing structure is a Historic County Landmark structure that will remain in place.	CEQA compliance was completed in 2021.	Big Sulphur Creek Bridge is approximately 10.4 miles east of the project site.
4	Geysers Road over Frasier Creek Bridge Replacement Project	Sonoma Public Infrastructure	Sonoma Public Infrastructure proposes to replace the existing bridge on Geysers Road over Frasier Creek. The new bridge will be 80 feet long, the new abutments will be located further up the creek bank from the existing abutments. A single span bridge is proposed, consisting of a cast-in-place reinforced concrete box girder type approximately 32 feet wide, with two 11-foot travel lanes and two 3-foot shoulders with no bike lanes or sidewalks.	CEQA compliance was completed in 2022. Construction is expected to begin in 2024.	Frasier Creek Bridge is approximately 5.4 miles east of the project site.

No.	Project Name	Agency	Description	Status/Timing	Location
5	Santa Rosa Aqueduct and Russian River to Cotati Aqueduct Cathodic Protection Project	Sonoma County Water Agency	The Russian River to Cotati and Santa Rosa aqueducts provide essential water service to approximately 600,000 residents and businesses within the Sonoma County Water Agency's service area. The project would include the construction of a total of 31 Cathodic Protection Stations and 49 test stations at intervals along the Santa Rosa and Russian River to Cotati aqueducts; vegetation maintenance activities associated with both aqueducts; and vegetation management at one location on the Petaluma Aqueduct.	CEQA was completed in 2021 and the project is currently in the planning and design stage. First phase of construction planned for Summer/Fall 2022.	Extends from Northern Russian River to Cotati Aqueduct and is proposed within Sonoma County along the Russian River. At its closest point, it is approximately 3 miles south of the project site.
6	Fish Habitat Flows and Water Rights Project	Sonoma County Water Agency	The Fish Flow Project has five purposes: comply with National Marine Fisheries Service's Russian River Biological Opinion, improve conditions for threatened Chinook salmon, replace a measuring requirement in Sonoma County Water Agency's water right permits, extend to 2040 Sonoma Water's right to divert and re-divert 75,000-acre feet of water annually, and add existing points of diversion for Occidental Community Service District and the Town of Windsor as authorized points of diversion in Sonoma Water's water right permits.	Ongoing activities include changes to minimum instream flows, and monitoring and reporting requirements for water and fish habitats in Sonoma County.	Extends through Russian River watershed through Sonoma County. The project includes land adjacent to Russian River, including the project site.
7	2021 - 2026 Capital Improvement Plan (CIP)	Sonoma County General Services Department, Regional Parks, Sonoma Public Infrastructure, and Sonoma County Water Agency	The Sonoma CIP for fiscal year (FY) 2021-26 represents a cross agency effort to prioritize county-wide capital improvements to address recovery related needs and improve access to government services. Each department/agency develops their own CIP laying out needed projects and associated costs. Regional Parks' 5 Year Capital Improvement Plan for FY 2021-26 includes 102 projects and totals \$152 million. The Cloverdale River Park Phase 4 Project is the closest to the project site and includes the development of a new permanent restroom, accessible paths and trails, group picnic facilities, and other park amenities. Other park improvement and development projects are proposed along the Russian River in in Guerneville and Healdsburg.	Regional Parks will be bringing projects to the Board for approval on a project-by-project basis to present and request funding for operations and maintenance costs associated with new parks, trails, and visitor amenities. Construction/operations of at least some of these projects would occur between 2021 and 2026.	Across Sonoma County, including all Regional Parks lands and the project site. The Cloverdale River Park Phase 4 Project is the closest development project to the project site and is located approximately 2 miles to the south. Improvements involve replacing existing portable restrooms with a permanent and accessible double vault restroom and developing accessible paths of travel from the existing parking area to the new restroom.

Notes: CIP = Capital Improvement Plan; FY – fiscal year; SCIPP = Sonoma County Integrated Parks Plan.

Source: Sonoma County 2015, 2021c, 2021d, 2022; Sonoma County Water Agency 2016a, 2016b, 2021; The Press Democrat 2020.

Cumulative Impact Analysis

The following describes the potential cumulative impacts of the project, by resource area. Because the project would have no impact on population and housing (see Section 3.14, "Population and Housing"), the project would not cause or contribute to any related cumulative impact, and no corresponding cumulative analysis is provided.

Aesthetics

The project would not have a substantial adverse effect on a scenic vista (significance criterion a), nor would it damage scenic resources (e.g., trees, rock outcroppings, and historic buildings) within a state scenic highway (significance criterion b). Therefore, the project would not contribute to corresponding cumulative impacts; these impacts are not discussed further.

The list approach is used to evaluate potential impacts to aesthetics because aesthetic and visual resource impacts are highly localized. The geographic extent for considering cumulative aesthetic impacts includes all projects located within the Russian River in the same viewshed as the project (i.e., area visible from a viewer's location). The viewshed includes the ongoing and proposed program activities associated with the SCIPP that occur within and in the immediate vicinity of the project site, and the Fish Habitat Flows and Water Rights Project. The ongoing operations, maintenance, and park improvements associated with implementing the SCIPP would typically require a few staff and minor equipment. The intermittent presence of vehicles and equipment for these activities would not substantially degrade the visual character and quality of the area and the undeveloped and open space visual landscape would remain intact. In addition, the Fish Habitat Flows and Water Rights Project would occur adjacent to the project site; however, changing minimum flows within the Russian River would not substantially alter public views. Thus, the cumulative scenario for aesthetics and visual resources when considering the project and the cumulative projects in the same viewshed is not significant. Similarly, the project would not substantially degrade the visual character and quality of the project site or surrounding viewshed. Therefore, the project would not contribute to nor create a cumulatively significant effect; there is **no significant cumulative impact**.

Agriculture and Forest Resources

The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (significance criterion a), conflict with existing zoning for agricultural use or a Williamson Act contract (significance criterion b), conflict with existing zoning for, or cause rezoning of forest land, timberland, or timberland zoned Timberland Production (significance criterion c), nor would it involve other changes in the existing environment, which could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use (significance criterion e). Therefore, the project would not contribute to corresponding cumulative impacts; these impacts are not discussed further.

The list approach is used to evaluate potential impacts to the loss of forest land or conversion of forest land to non-forest use (significance criterion d). The cumulative projects considered include all ongoing and proposed activities that could occur within and in the immediate vicinity of the project site (i.e., the SCIPP and Fish Habitat Flows and Water Rights Project) and thus have the potential to affect the same forest lands as the project.

Ongoing activities associated with the SCIPP include intermittent activities typically requiring a few staff and minor equipment to enhance County park and trail facilities through road and trail maintenance and improvements to existing facilities. Accordingly, no substantial loss or conversion of forest land would result. The Fish Habitat Flows and Water Rights Project would change instream flows and monitor and report on water and fish habitats; it would have no impact on forest resources. Therefore, these projects would not result in the loss or conversion of forest land and the cumulative scenario for the loss of forest land when considering the project and the cumulative projects is not significant. Similarly, the project would not result in substantial loss or conversion of forest land. Therefore, the project would not contribute to nor create a cumulatively significant effect; there is **no significant cumulative impact**.

Air Quality

The project would not conflict with or obstruct implementation of the applicable air quality plan (significance criterion a); therefore, the project would not contribute to corresponding cumulative impacts. This impact is not discussed further.

Past, present, and future development projects contribute to a region's adverse air quality on a cumulative basis. A project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. Therefore, the

projections approach is used to determine cumulative impacts related to a net increase in criteria pollutants for which the region is in nonattainment (significance criterion b). NoSoCo Air has not adopted standards of significance for construction or operation air quality pollutants and instead suggests the use of BAAQMDs thresholds and mitigation measures. Therefore, NoSoCo Air relies on BAAQMD CEQA Air Quality Guidelines and significance thresholds to assess air quality emissions from land use development projects. To assess air basin-wide cumulative impacts related to air quality standards, this analysis evaluates emissions compared to significance thresholds adopted by BAAQMD, per the projections approach. BAAQMD's thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAABs existing nonattainment air quality conditions. As shown in Table 3.7-3 and Table 3.7-4, the project's construction and operational emissions of criteria pollutants would be below the BAAQMD average daily thresholds of significance. Therefore, the project's contribution to a net increase in criteria pollutants (significance criterion b) **would not be a considerable contribution to this cumulative impact.**

The list approach was used to determine localized air quality impacts related to exposure of sensitive receptors to substantial pollutant concentrations (significance criterion c) and odor impacts (significance criterion d). The geographic extent for exposure of receptors to substantial pollutant concentrations and odors is conservatively set at 0.50-mile to adequately cover impacts associated with the temporary, intermittent emissions that would be generated during construction of the project. The projects within the geographic extent are the ongoing program activities, monitoring, general operations and maintenance activities that occur under the SCIPP and the Fish Habitat Flows and Water Rights Project.

The ongoing operations, maintenance, and improvements that occur under the SCIPP include road and trail maintenance and improvements to existing facilities. These activities typically require a few staff and minor equipment. Use of vehicles and equipment would generate temporary and periodic exhaust that could lead to odors and expose sensitive receptors to pollutant concentrations. However, these activities would generally be short in duration, intermittent, and involve minimal pieces of emissions-generating equipment. Additionally, the Fish Habitat Flows and Water Rights Project would not include any substantial construction activities or operational emissions and would, therefore, not result in any equipment-related odors or increases in criteria air pollutants, their precursors, or toxic air contaminants. Furthermore, sensitive receptors, which include land uses where exposure to pollutants could result in health-related risks to sensitive individuals, are limited given that the project site is within a rural area used mainly for recreation. Thus, the cumulative scenario for exposing sensitive receptors to substantial pollutant concentrations and odors is not significant. Similarly, the project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, the project would not contribute to nor create a cumulatively significant effect; there is **no significant cumulative impact.**

Biological Resources

The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (significance criterion f); therefore, the project would not contribute to corresponding cumulative impacts. This impact is not discussed further.

The projections approach is used for the cumulative analysis of the remaining biological resources criteria because biological resource related impacts can have region-wide effects that extend beyond a project site. The cumulative impact section of the 2020 Sonoma County General Plan Environmental Impact Report (General Plan EIR) is relied upon to evaluate the cumulative scenario because it considers all development projects in the County. According to the General Plan EIR, cumulative impacts were determined to be significant for special-status species due to significant losses of populations or essential habitat for special-status species, the loss of sensitive natural communities, and to the movement of wildlife (Sonoma County 2020). Therefore, the cumulative scenario for state and federally protected wetlands (significance criterion c) and conflicts with local policies or ordinances protecting biological resources (significance criterion e) is not considered significant and there would be no significant cumulative impact.

The cumulative scenario for species identified as a candidate, sensitive, or special-status species in local or regional plans (significance criterion a); riparian habitat or other sensitive natural communities (significance criterion b); and the movement wildlife species (significance criterion d) is considered significant and each are addressed below.

Special-Status Species

Special-Status Plants

Eleven special-status plants are known to occur or could occur in the project site (see Table 3.8-1 for species names and occurrence potential of these species). However, a botanical survey of the project site conducted during the blooming period for the 11 special-status botanical species with potential to occur did not identify any special-status plants. The project would not impact special-status botanical species and therefore, the project **would not have a considerable contribution to this cumulative impact.**

Special-Status Animal Species

There are several special-status wildlife species that are known to occur or could occur in or adjacent to the project site, including eight special-status fish, two special-status amphibians, one special-status reptile, two special-status raptors, two special-status bats, ringtail, and common nesting birds (see Section 3.4.2, "Discussion," and Appendix B). Grading new trails and other ground-disturbing project activities that would occur on the bank of the Russian River could result in erosion, sedimentation, and runoff into the river, which could result in a substantial impact on the local population of special-status fish species. Implementation of temporary erosion control BMPs (e.g., waddles, silt fencing) would prevent indirect effects to special-status fish and critical habitat by preventing contaminated runoff from construction of project features from reaching the river. In addition, Mitigation Measure BIO-1 would be implemented, which would require Regional Parks to suspend construction work when it is raining or the soils are saturated, which would help to prevent erosion, sedimentation, and construction debris from entering stormwater and reaching the Russian River. Therefore, the project would not negatively affect special-status fish and associated habitat.

Project construction would occur within and adjacent to suitable habitat for special-status amphibians and reptiles and the project has the potential to indirectly affect special-status amphibians and critical habitat for the foothill yellow-legged frog, red-bellied newt, and northwest/north coast clade. However, no work would occur below the OHWM or within the wetted portion of the Russian River channel during construction, and the majority of project features would be placed in existing disturbed areas and thus would not remove upland habitat. To further avoid loss of critical habitat and impacts to these species, Regional Parks would implement Mitigation Measure BIO-2a and Mitigation Measure BIO-2b. Mitigation Measure BIO-2a requires environmental awareness training for all construction workers conducted by a qualified biologist or biological monitor prior to construction activities. Mitigation Measure BIO-2b requires pre-construction surveys for special-status amphibians and reptiles be conducted by a qualified biologist within 48 hours before ground disturbance and vegetation clearing, and specific measures to avoid individuals if present. With implementation of Mitigation Measure BIO-2a and Mitigation Measure BIO-2b, the project would not negatively affect special-status amphibians and reptiles.

While the project would occur within suitable habitat for ringtail, construction of the project would not result in the physical destruction of ringtail denning habitat. Grading for the project would occur primarily within existing disturbed areas, or directly adjacent to disturbed areas where there is existing recreational use and denning is unlikely. Similarly, the potential removal of trees along Geysers Road would not result in direct removal of ringtail dens as the high level of disturbance from the road makes the use of these trees as dens unlikely. The proposed project would not result in substantial physical loss of foraging or denning habitat from project activities, would reduce impacts associated with informal recreation, and would not substantially increase the amount of recreation in the project site; therefore, the project would not have a substantial adverse effect on foraging or denning habitat for ringtail. The elevated noise and activity associated with construction activities could result in indirect disturbance of ringtail dens if present in the project site. Mitigation Measure BIO-2a and Mitigation Measure BIO-5 would avoid and minimize adverse effects on ringtail from the implementation of the proposed project by conducting worker education, surveys for active dens prior to construction, and implementation of a non-disturbance buffer around active dens during the maternity season. Therefore, with the implementation of Mitigation Measure BIO-2a and Mitigation Measure BIO-5, potential impacts to ringtail would be avoided.

Tree removal that may occur during construction of the connector path could inadvertently remove foraging and nesting habitat for special-status raptors, special-status bats, and common nesting birds. In addition, noise and other disturbances that are common during construction could disturb the nesting/roosting of any of these species and cause

abandonment. However, tree removal would occur directly adjacent to Geysers Road where trees would be of limited use for perching and nesting due to existing travel on the road. In addition, Regional Parks would incorporate several mitigation measures to avoid and minimize impacts to these species and habitats. Mitigation Measure BIO-3 would be implemented which requires pre-construction surveys for nesting eagles to be conducted within 14 days prior to construction, and implementation of non-disturbance buffers if nests are identified. Mitigation Measure BIO-4 requires a qualified bat biologist to inspect the project footprint and adjacent areas for bat roosts within 14 days of construction and implementation of non-disturbance buffers if roosts are identified. Mitigation Measure BIO-6 requires that a nesting bird survey be conducted prior to construction and vegetation removal that occurs during the nesting bird season (February 1 – August 31), within 14 days of the start of activities, and if nests are identified, implementation of non-disturbance buffers until the young have fledged. With implementation of Mitigation Measure BIO-3, BIO-4, and BIO-6, the project would not result in a substantial impact to special-status raptors, bats, or common nesting birds.

Therefore, with the implementation of project BMPs and mitigation measures as described above, significant impacts to these wildlife species and their habitats would be avoided or substantially minimized. Therefore, the project's impact **would not be a considerable contribution to this cumulative impact.**

Riparian Habitat and Other Sensitive Natural Communities

The construction of the connector path may result in the removal of up to 20 trees within oak woodland communities. However, the loss of these trees would not result in a type conversion of oak woodland because tree removal would be minimized through trail design and be spaced over an approximately 1.75-mile alignment. No type conversion of any riparian habitat is anticipated. While conversion of riparian habitat would not occur, grading for trail widening and realignment would occur below the top of the bank of the Russian River and could result in the removal of some riparian vegetation; however, it would be minor and abundant riparian vegetation would remain. The proposed realignment of the southeasternmost portion of the trail in Access Area 3 could result in loss of a small area of Torrey's melic grass grassland that was identified in the project site (Appendix B), which is a sensitive natural community. However, Regional Parks would implement Mitigation Measure BIO-7, which would minimize adverse effects on Torrey's melic grass grassland from the implementation of the proposed project by avoiding the Torrey's melic grass grassland if possible and providing compensatory mitigation for loss and disturbance of Torrey's melic grass grassland either through mitigation banking or on-site restoration at a ratio of 1:1. Therefore, the project's impact **would not be a considerable contribution to this cumulative impact.**

Movement of Wildlife Species

The project site is currently used by recreationists accessing the river and any additional recreation use or access associated with the project would not impede use of the project site for wildlife movement. Also, the project would not place any project features within the Russian River that would pose a barrier to fish passage. Furthermore, the proposed connector path, trails, parking areas, and vault toilets would not create any substantial physical barriers to wildlife movement that prevent the passage of wildlife through the project site. Although construction of these project features may have a temporary impact on wildlife movement due to the noise produced by heavy mechanical equipment and powered hand tools, construction would be limited to daytime hours, between 7:00 a.m. and 5:00 p.m., which would avoid the early evening through early morning hours when terrestrial wildlife (e.g., mule deer) is most active. Therefore, the project's impact **would not be a considerable contribution to this cumulative impact.**

Cultural Resources

The project would not cause a substantial adverse change in the significance of a historical resource (significance criterion a); therefore, the project would not contribute to corresponding cumulative impacts. This impact is not discussed further.

Because all significant cultural and tribal cultural resources are unique and nonrenewable members of finite classes, all adverse effects or negative impacts erode a dwindling resource base. The loss of any one archaeological or historic site affects all others in a region because these resources are best understood in the context of the entirety of the cultural system of which they are a part. Because the projects listed in Table 3.25-1 cover the Russian River area of Sonoma County, the geographic extent for the cumulative cultural resources analysis uses the project list approach. All of the cumulative projects listed in Table 3.25-1 are included in this analysis.

Archeological Resources

The cumulative projects involving ground-disturbing activities could result in an impact to unknown archeological resources. Given increasing development in the region and the potential for the projects and programs listed in Table 3.25-1 to affect archaeological resources, the cumulative scenario for archaeological resource impacts in the region is significant.

As discussed in Section 3.5.2 criterion b), the region has been inhabited since 8000 BP; therefore, it is possible that unrecorded precontact archaeological materials could be unearthed during ground-disturbing construction activities and from use of heavy equipment. To reduce the potential impact on archaeological resources, Regional Parks would implement Mitigation Measure CUL-1 if an unknown archeological resource is discovered during project construction. Per Mitigation Measure CUL-1, all work will stop within 50 feet of the discovery until a qualified archaeologist can assess the find. Depending on the significance and type of find, specific actions will be implemented, which could include consultation with the affiliated Native American tribe if the discovery is a precontact archeological site. With implementation of Mitigation Measure CUL-1, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5, and the project's impact **would not be a considerable contribution to this cumulative impact**.

Human Remains

California Health and Safety Code and California Public Resources Code Section 5097 protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. All of the cumulative projects would be required to comply with state and County regulations. These regulations avoid or minimize the disturbance of human remains, and appropriately treat any remains that are discovered. Thus, the cumulative scenario is not significant for this impact.

Similarly, Regional Parks would comply with Mitigation Measure CUL-1, which requires discovered human remains to be treated in accordance with the State of California Health and Safety Code Section 7050.5, in consultation with the NAHC. Therefore, the project would not contribute to nor create a cumulatively significant effect; there is **no significant cumulative impact**.

Energy

The projection approach is used to analyze energy impacts because energy resources are used on a regional basis. California relies on a regional power system composed of a diverse mix of natural gas, petroleum, renewable, hydroelectric, and nuclear generation resources. The 2003 California Energy Action Plan is relied upon to evaluate the cumulative scenario because it addresses several energy efficiency strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs, and encouragement of urban design that reduces VMT and accommodates pedestrian and bicycle access. All of the cumulative projects listed in Table 3.25-1 are included in the cumulative analysis.

According to the 2003 California Energy Action Plan (2008 Update), inefficient energy appliances and buildings and inefficient vehicles and equipment requiring fuel could lead to the wasteful, inefficient, or unnecessary consumption of energy resources. Construction and ongoing maintenance associated with the cumulative projects listed in Table 3.25-1 would require the use of vehicles and equipment. The energy required for construction of cumulative projects would be temporary and short-term. Operational activities related to the project would also be minimal, requiring only ongoing maintenance and monitoring type activities. For these reasons, and because none of the cumulative projects would involve the construction of inefficient energy appliances or buildings, the cumulative scenario is not significant for this impact.

Similarly, construction and operation of the proposed project would result in increased energy use; however, the increase in energy consumption would be very small and would not be wasteful, inefficient, or unnecessary. Therefore, the project would not contribute to nor create a cumulatively significant effect; there is **no significant cumulative impact**.

Geology and Soils

The project would not directly or indirectly cause potential substantial adverse effects resulting from the rupture of a known earthquake fault (significance criterion a) i). Therefore, the project would not contribute to corresponding cumulative impacts; these impacts are not discussed further.

For all other geologic impacts associated with seismic ground shaking (significance criterion a) ii); seismic-related ground failure (significance criterion a) iii); landslides (significance criterion a) iv); soil erosion and loss of topsoil (significance criterion b); unstable geologic unit or soil (significance criterion c); being located on expansive soil creating substantial direct or indirect risks to life or property (significance criterion d); having soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water (significance criterion e); and paleontological resources (significance criterion f), the list approach was used. This approach was used to evaluate potential cumulative impacts because soil impacts are highly localized. Thus, the geographic extent for considering cumulative geological impacts is a 0.10-mile radius from the project site. The cumulative projects within 0.10-mile of the project site are the general operations and maintenance activities associated with the SCIPP and the Fish Habitat Flows and Water Rights Project.

The operations and maintenance activities and improvements to existing facilities conducted under the SCIPP and changes to minimum instream flows and ongoing monitoring under the Fish Habitat Flows and Water Rights Project would not require the construction of large structures that could be subject to geologic and seismic hazards or create unstable conditions. In addition, none of these activities would include deep excavations that could result in unstable soils or potentially unearth paleontological resources. Thus, the cumulative scenario for geologic and soils is not significant.

Similarly, the proposed project would not develop any large or habitable structures. New structures would be limited to picnic tables and four small vault toilets. Although excavations to install the vault toilets could potentially unearth unknown unique paleontological resources or sites during construction, Regional Parks would implement Mitigation Measure GEO-1, which requires that all ground-disturbing activity within 50 feet of a discovery be halted immediately until a qualified paleontologist can assess the nature and significance of a find. No construction would occur within 50 feet of the find until the qualified paleontologist has determined and implemented the appropriate salvage and treatment of the find and confirms that construction may proceed. Therefore, the project would not contribute to nor create a cumulatively significant effect; there is **no significant cumulative impact**.

Greenhouse Gas Emissions

The cumulative scenario encompasses all GHG emission sources in California, which includes sources such as transportation, manufacturing, energy production, and agriculture. Regional and global development patterns continue to rely on methods and practices that contribute large volumes of GHGs to the atmosphere, and impacts related to GHGs have widespread and potentially harmful consequences. The increase in GHGs in the atmosphere, caused in large part by human activity, is now one of the key causes of global climate change. Current scientific research indicates that potential effects of climate change include variations in temperature and precipitation, sea-level rise, impacts on biodiversity and habitat, impacts on agriculture and forestry, and human health and social impacts. As described in the state's Climate Change Scoping Plan of 2014, GHG sources in the state collectively result in emissions that are higher than the targets established by AB 32, which indicates that GHG emissions in the state continue to contribute to a total significant state-wide cumulative impact. The cumulative scenario for GHG emissions in the region is therefore significant.

As described in Section 3.8.2, criterion a), the project would generate 408 MTCO₂e from equipment use and vehicle trips during construction. During operations, the project is estimated to generate roughly 10 MTCO₂e per year from area sources (i.e., landscape equipment), solid waste generation, wastewater generation, and mobile sources (i.e., vehicle trips). The annual operational emissions combined with amortized construction emissions (23 MTCO₂e per year) would be well below BAAQMD's adopted significance threshold of 1,100 MTCO₂e per year, or the adjusted SB 32 threshold of 660 MTCO₂e per year. In addition, the project would promote the conservation of open space and promote carbon sequestration. As described in Section 3.8.2, criterion b), the project would not conflict with the County's resolution and regional CAP efforts to reduce GHG emissions because it would not result in substantial ongoing energy use, would be a local serving use for low intensity recreational activities, and would promote restoration of land. Therefore, the project's impact **would not be a considerable contribution to this cumulative impact**.

Hazards and Hazardous Materials

The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school (significance criterion c); be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment (significance criterion d); or be located within an airport land use plan or within 2 miles of a public or private airport/airstrip (significance criterion e); therefore, the project would not contribute to corresponding cumulative impacts. These impacts are not discussed further.

Hazards and hazardous materials impacts are project-specific and highly localized. Therefore, the cumulative hazards and hazardous materials analysis uses the list approach. The geographic scope of hazardous material cumulative impacts would be the area within 0.25-mile of the project site because there is low risk for a geographically large and dispersed hazardous material spill or release, uncontrolled and widespread wildland fire, or regional effects to implementation of an emergency response or evacuation plan as a result of the project. The cumulative projects within 0.25-mile of the project site are the ongoing general operations and maintenance activities that occur under the SCIPP and the Fish Habitat Flows and Water Rights Project.

Activities conducted under the SCIPP and the Fish Habitat Flows and Water Rights may involve the routine use and storage of small quantities of common hazardous materials such as fuels, oils, and lubricants, which would be used to operate mechanical equipment and vehicles. No large quantities of hazardous materials would be transported, used, or stored under these projects and no large hazardous materials spills or dispersal could occur. Furthermore, these activities would occur in the vicinity of the project site, which is far from urban or residential areas where large quantities of people are present. In addition, the use of these common hazardous materials is subject to numerous laws, regulations, and policies that control the use of hazardous materials and protect public health and safety. These projects also would not impair the implementation of an adopted emergency response plan or expose people to significant risks related to wildland fires because they involve only minor ongoing maintenance and monitoring activities and would not result in increased visitation to the area or obstruct access to the area. For these reasons, the cumulative scenario is not significant.

Similarly, construction of the proposed project would require the use of limited quantities of hazardous materials, such as fuels, oils, lubricants, and other fluids associated with the operation and maintenance of vehicles or mechanical equipment. Use of these hazardous materials would be temporary, and all hazardous materials would be used, stored, and disposed of in accordance with applicable federal, state, and local laws. The project also would not impair the implementation of an emergency response plan or expose people or structures to significant risks associated with wildland fires. Therefore, the project would not contribute to nor create a cumulatively significant effect on the environment; there is **no significant cumulative impact**.

Hydrology and Water Quality

The project would not risk release of pollutants due to project inundation from being within a flood hazard, tsunami, or seiche zones (significance criterion d) or surface runoff (significance criterion c) ii). Therefore, the project would not contribute to corresponding cumulative impacts. This impact is not discussed further.

The project-related hydrology and water quality impacts are project-specific and highly localized. Therefore, impacts on water quality (significance criterion a), groundwater supply (significance criterion b), erosion and siltation (significance criterion c) i), stormwater drainage (significance criterion c) iii), flood flows (significance criterion c) iv), and conflicting or obstructing with a water quality control plan or sustainable groundwater management plan (significance criterion e) are analyzed using the project list approach. The geographic extent for considering project-related cumulative impacts on hydrology and water quality includes projects within 0.50-mile of the project because this distance encompasses the nearest waterways and drainages where local impacts to hydrology and water quality could combine. The cumulative projects within 0.50-mile of the project site are the operations and maintenance activities conducted under the SCIPP and the Fish Habitat Flows and Water Rights Project.

The SCIPP and the Fish Habitat Flows and Water Rights Project involve ongoing monitoring, maintenance, improvements to existing facilities, and altering minimum flows of the Russian River. These activities would not result in large, new structures, substantial ground disturbance, or require large quantities of water. Accordingly, they would not affect

groundwater supply (significance criterion b), stormwater drainage (stormwater drainage (significance criterion c) iii), flood flows (significance criterion c) iv), or obstruct a water quality control plan or sustainable groundwater management plan (significance criterion e); therefore, the cumulative scenario for these topics is not significant and the project would not contribute nor create a cumulative significant effect.

Road and trail maintenance and improvements to existing facilities under the SCIPP likely includes vehicle and equipment use and some limited ground disturbance, which could result in erosion, sedimentation, and runoff of pollutants. In addition, changes to water levels in the Russian River under the Fish Habitat Flows and Water Rights Project could result in impacts related to water quality from erosion and sedimentation in the upper Russian River as a result of alteration to drainage patterns. Because both projects have the potential to result in erosion and sedimentation (significance criterion c) i) and affect water quality of the Russian River (significance criterion a), the cumulative scenario is considered significant for these topics.

The proposed project would not construct buildings or large areas of impervious surfaces that could lead to water quality impacts through increased runoff. No work within the waters or the OHWM of the Russian River would occur, and all construction laydown, staging, and activity would occur outside of the FEMA floodplain associated with the Russian River. In addition, prior to construction, stormwater control and capture BMPs would be installed to help prevent erosion, sedimentation, and pollutants from entering the Russian River or other surrounding water bodies consistent with the requirements of a SWPPP. BMPs required by the SWPPP would include measures to reduce erosion and sedimentation, such as the installation of perimeter siltation fencing and wattles to prevent off-site erosion and use of erosion control mats to prevent exposed soils from being displaced by rain or wind and entering nearby surface waters. In addition, Mitigation Measure BIO-1 includes additional requirements to avoid and minimize erosion, sedimentation, and pollutants from entering the Russian River by prohibiting construction during rain events and when soils are saturated. Therefore, the project's impact **would not be a considerable contribution to this cumulative impact.**

Land Use

The project would not physically divide an established community (significance criterion a); therefore, the project would not contribute to a corresponding cumulative impact; this impact is not discussed further.

The project list approach was used to determine cumulative impacts related to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (significance criterion b), because potential environmental impacts on land uses are generally limited to the communities surrounding a project site. The geographic extent for considering cumulative impacts is Sonoma County, therefore, all of the cumulative projects listed in Table 3.25-1 are included in this analysis.

The cumulative projects involve public access and recreation improvements, operations and maintenance activities, vegetation management, emergency access, water infrastructure, and habitat protection programs. None of these projects involve the development of new land uses or activities that substantially differ from existing conditions that could result in conflicts with land use plans, policies, or regulations. The public access and recreation improvements, operations and maintenance activities, and vegetation management would improve and maintain areas for public use and enjoyment. Land use impacts associated with these types of projects would be minor and in the long-term, benefit the public by supporting high quality public access to nature. Thus, the cumulative scenario for land use is not significant.

Similarly, the proposed project would develop public amenities that support public access and recreation at the project site. Only low intensity recreational activities would be permitted, such as picnicking, hiking, fishing, nature appreciation, and photography. The project would be consistent with the RRD land use designation, which permits low intensity recreation that supports the study, appreciation, or enhancement of the natural environment. Therefore, the project would not contribute to nor create a cumulatively significant effect; there is **no significant cumulative impact.**

Mineral Resources

Cumulative mineral resource impacts associated with loss of availability of a known mineral resource (significance criterion a) or loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land use plan (significance criterion b) are evaluated using the list approach because mineral resource deposits are highly localized. Thus, the geographic extent for considering cumulative mineral resource impacts

is a 0.50-mile radius from the project site. Within 0.50-mile of the project site are the ongoing activities conducted under the SCIPP and the Fish Habitat Flows and Water Rights Project.

Areas along the Russian River are known to contain extensive deposits of sand and gravel, some of which supply the high-quality aggregate for most of the North San Francisco Bay Region. The project site and vicinity therefore has the potential to contain locally important mineral resources. However, the SCIPP and the Fish Habitat Flows and Water Rights Project involve ongoing monitoring, maintenance, improvements to existing trails and facilities, and altering minimum flows of the Russian River. Accordingly, they would not require the construction of large new structures, extensive cut, fill, or other substantial grading activities or development that could result in the loss of mineral resources or mineral resource recovery sites. Thus, the cumulative scenario for mineral resources is not significant.

Similarly, the proposed project would not result in the loss of mineral resources because it would implement new amenities to support public access and recreation, including picnic areas, vault toilets, and formalizing trails and parking areas, primarily in previously disturbed areas. If mineral resources were present on the project site, their availability would not be restricted by implementation of new and improved public access features. Therefore, the project would not contribute to nor create a cumulatively significant effect; there is **no significant cumulative impact**.

Noise

The project would not be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, or within 2 miles of a public airport or public use airport, and would not expose people residing or working in the project area to excessive noise levels (significance criterion c); therefore, the project would not contribute to a corresponding cumulative impact. This impact is not discussed further.

Noise impacts are project-specific and highly localized. Therefore, impacts from the 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 (significance criterion a), and excessive groundborne vibration or groundborne noise levels (significance criterion b) are analyzed using the project list approach. The geographic extent for considering cumulative noise impacts is any project within 0.25-mile of the project site given the highly localized nature of noise and vibration impacts. The cumulative projects within 0.25-mile of the project site are the general operations and maintenance activities under the SCIPP and the Fish Habitat Flows and Water Rights Project.

The Fish Habitat Flows and Water Rights Project would not result in any noise or vibration in the vicinity of the project site. General operations and maintenance activities, road and trail maintenance, and improvements to existing park facilities under the SCIPP could generate noise as a result of mechanical equipment use, such as grading equipment. However, the use of noise generating equipment would be limited, dispersed across Regional Parks properties throughout Sonoma County, and intermittent in nature. Additionally, all activities would occur during daytime hours when people are less sensitive to noise impacts. Therefore, the cumulative scenario for noise would not be significant.

Similarly, while the project would generate construction noise and vibration, it would be temporary and construction activities would occur during the less sensitive daytime hours, as required in the Noise Element of the Sonoma County General Plan and would not exceed applicable standards. Therefore, the project would not contribute to nor create a cumulatively significant effect; there is **no significant cumulative impact**.

Public Services

The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain performance objectives for schools, parks, or other public facilities; therefore, the project would not contribute to corresponding cumulative impacts. These impacts are not discussed further.

The list approach is used to evaluate potential impacts to police and fire and all the cumulative projects listed in Table 3.25-1 are included in this cumulative analysis.

The cumulative projects involve public access and recreation improvements, road and trail maintenance activities, emergency access, water infrastructure, and habitat protection programs. None of these projects involve the

development of new residences or businesses that would require increased fire and police protection. The public access improvement projects could result in increased visitation to parks and natural areas. However, public access would generally be limited to daytime hours and would involve passive recreation, such as hiking and nature appreciation. Furthermore, many of these areas are currently accessible to the public, so any increase in the need for police and fire protection would be minimal. For these reasons, the cumulative scenario for public services would not be significant.

Similarly, the project would not result in the development of residences or businesses that could increase demand for fire or police protection. The project includes recreation features for passive recreation, including hiking and nature appreciation, and would only be open to the public from sunrise to sunset and any increase in demand for police and fire protection would be minimal. Therefore, the project would not contribute to nor create a cumulatively significant effect; there is **no significant cumulative impact**.

Recreation

The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated (significance criterion a); therefore, the project would not contribute to a corresponding cumulative impact. This impact is not discussed further.

The project list approach was used to determine cumulative impacts related to construction or expansion of recreational facilities, which could have an adverse physical effect on the environment (significance criterion b) because potential environmental impacts on recreational resources are generally limited to the communities surrounding the project that would use those recreational resources. The geographic extent for considering cumulative impacts is Sonoma County; however, only recreation related projects need to be considered. Therefore, activities under the SCIPP and the Cloverdale River Park Phase 4 Project are considered in the analysis.

Projects implemented under the SCIPP and the Cloverdale River Park Phase 4 Project involve the road and trail maintenance and construction and/or improvements to recreational facilities, which could lead to an adverse effect on the physical environment. However, activities under the SCIPP and Cloverdale River Park Phase 4 consist primarily of improvements to existing public access and recreation amenities. The environmental impacts associated with these types of projects are relatively minor and would be dispersed throughout the County, and in the long-term, benefit the public by providing high quality access to nature. Thus, the cumulative scenario for recreational resources is not significant.

Similarly, the project would improve and develop public access features and amenities; the environmental effects are addressed throughout this Initial Study and no significant and unavoidable or cumulatively significant impacts would occur. Therefore, the project would not contribute to nor create a cumulatively significant effect on the environment; there is **no significant cumulative impact**.

Transportation

The project list approach is used to evaluate potential cumulative transportation effects because cumulative transportation impacts would generally be limited to the roadways that would be used to access the project. The geographic extent for considering cumulative impacts is 5 miles to encompass the local roadways that serve the project site. Cumulative projects within 5 miles of the project site are operations and maintenance activities occurring under the SCIPP, habitat and vegetation monitoring and altering instream flows associated with the Fish Habitat Flows and Water Rights Projects, construction associated with the Santa Rosa Aqueduct and Russian River to Cotati Aqueduct Cathodic Protection Project, and construction and/or operation of the Cloverdale River Park Phase 4 Project included in the 2021-2026 CIP.

Many of the cumulative projects involve periodic operations and maintenance of existing facilities, or minor improvements to existing facilities, which would only involve a few staff or small crews, such as activities occurring under the SCIPP and Fish Habitat Flows and Water Rights Projects. These types of projects would therefore not result in substantial additional vehicle trips or increase hazards on local roadways, conflict with a plan or program addressing the circulation system, or result in inadequate emergency access. Construction associated with the Cloverdale River Park Phase 4 Project and the Santa Rosa Aqueduct and Russian River to Cotati Aqueduct Cathodic Protection Project could overlap with construction of the proposed project and add construction vehicle trips to the same roadways as the project. However, given their distance from the project site (i.e., 2 and 3 miles away, respectively), that these are relatively small projects, and construction would be temporary and intermittent, they would not result in substantial adverse effects

to transportation or circulation. The Santa Rosa Aqueduct and Russian River to Cotati Aqueduct Cathodic Protection Project is a water infrastructure improvement project that would not result in substantial new operational trips on local roadways. In addition, the Cloverdale River Park Phase 4 Project involves minor improvements to the existing Cloverdale River Park and would also not result in substantial new operational trips. Therefore, the cumulative scenario for transportation would not be significant.

Similarly, construction activities and operations associated with the project are not expected to conflict with a program, plan, ordinance, or policy addressing the circulation system; or significantly increase VMT in the region. With the implementation of Mitigation Measure TRAN-1, the project would not increase transportation hazards or result in inadequate emergency access. Therefore, the project would not contribute to nor create a cumulatively significant effect; there is **no significant cumulative impact**.

Tribal Cultural Resource

Because all significant TCRs are unique and nonrenewable members of finite classes, all adverse effects or negative impacts erode a dwindling resource base. The loss of any TCRs affects all others in a region because these resources are best understood in the context of the entirety of the cultural system of which they are a part. The cumulative TCR analysis uses the project list approach, and the geographic extent includes the Sonoma County region. Therefore, all of the cumulative projects listed in Table 3.25-1 are included in this analysis.

The cumulative projects listed in Table 3.25-1 are within or in close proximity to areas historically occupied by the Southern Pomo, and inadvertent discovery or damage of unknown TCRs could occur if present. Given increasing development in the region and the potential for the cumulative projects listed in Table 3.25-1 to affect tribal cultural resources, the cumulative scenario for tribal cultural resources in the region is considered significant.

Similarly, the project is in an area known to have included previous Native American use and there is a potential for unknown TCRs to be present within the project site, which could be damaged if encountered during ground-disturbing construction activities. To limit accidental damage to unknown TCRs, Regional Parks would implement Mitigation Measure CUL-1. Per Mitigation Measure CUL-1, if a precontact archeological site is uncovered during construction activities, Regional Parks would halt all ground-disturbing activity within 50 feet of the discovery until a qualified archaeologist can assess the find. Depending on the significance and type of find, specific actions would be implemented, which could include notification of the culturally affiliated tribe and resource documentation. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries would be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, and analyzes and interprets the results. Additionally, Regional Parks would implement all project-specific protective measures recommended by the qualified archaeologist in coordination with the affiliated tribe. Thus, potential impacts to TCRs from project implementation would be avoided and minimized such that tribal cultural resources would maintain their integrity. Therefore, the project's impact **would not be a considerable contribution to this cumulative impact**.

Utilities and Service Systems

The project would not result in insufficient water supplies (significance criterion b); therefore, the project would not contribute to a corresponding cumulative impact. This impact is not discussed further.

For all other public utility-related impacts associated with new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities (significance criterion a); inadequate wastewater treatment capacity (significance criterion c); solid waste (significance criterion d); and the failure to comply with regulations related to the reduction of solid waste (significance criterion e), all of the cumulative projects in Table 3.25-1 are considered. This is because public utilities serve the Sonoma County region and therefore all of the projects could impact the same public utility providers.

Many of the cumulative projects involve periodic operations and maintenance of existing facilities, or minor improvements to existing facilities, which would only involve a few staff or small crews, such as the activities occurring under the SCIPP and Fish Habitat Flows and Water Rights Projects. These types of projects would therefore not adversely affect public utilities in the area. Additionally, none of the cumulative projects involve new residences or other large

developments thereby increasing the demand for public utilities, such as water, wastewater treatment, or solid waste services. Thus, the cumulative scenario for utilities is not cumulatively significant.

Similarly, construction activities and operations associated with the project would not substantially increase demand for public utilities. The generation of construction waste would be temporary, would cease when construction is complete, and would not be substantial. Once operational, visitors to the project site would generate a small amount of solid waste, such as food and beverage waste, which would be deposited in trash and recycling receptacles located throughout the project site. Wastewater generated by four vault toilets would be removed and disposed of by a third-party contractor, as needed, and would not substantially increase wastewater treatment demand over existing conditions. The project would not result in the need for any new or expanded utilities or service systems. Therefore, the project would not contribute to nor create a cumulatively significant effect; there is **no significant cumulative impact**.

Wildfire

The project list approach is used to evaluate potential wildfire impacts because these impacts generally affect specific areas. However, although wildfire ignition is site-specific, wildfire can spread and produce smoke outside of the initial area where it starts. For this reason, the geographic scope for evaluating cumulative wildfire impacts is Sonoma County and all the cumulative projects listed in Table 3.25-1 are included in the cumulative analysis.

The cumulative projects involve water infrastructure and flood protection improvements, public access improvements, and ongoing operations and maintenance activities. Sources of ignition from construction and operations and maintenance would be limited to intermittent mechanical equipment use. Pursuant to PRC Section 4442, all diesel- and gasoline-powered equipment used on forest-, brush-, or grass-covered lands are required use spark arrestors to reduce the likelihood of ignition, which would avoid and minimize the potential for accidental wildfire ignition. The cumulative projects involving public access and recreation may increase public use of natural areas, which could increase wildfire risk. However, the public currently has access to most of the areas where recreation related projects would occur (e.g., Cloverdale River Park), and the potential for increased wildfire risk is minimal. In addition, low-intensity and passive recreation activities, such as hiking or bicycling, do not introduce new ignition sources or otherwise increase fire risk. Therefore, the cumulative scenario for wildfire is not cumulatively significant.

Similarly, the project would involve developing low-intensity recreation within the project site, which would not substantially increase wildfire risk. Therefore, the project would not contribute to nor create a cumulatively significant effect; there is **no significant cumulative impact**.

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

Less than significant. Impacts to human beings could result from substantial air quality and GHG emissions, accidental upset or release of hazardous materials, substantial noise creation, risks related seismic activity and stability of soils, and increased risk of wildfire. However, based on the nature and scope of the project (i.e., construction and operation of public access and recreation features) and the analysis herein, the project would not result in any direct or indirect substantial adverse effects on human beings. Project related impacts involving exposure of sensitive receptors to substantial pollutant concentrations or odors, GHG emissions, seismic activity and soil stability, hazards and hazardous materials, noise, and wildfire would all be less than significant for the reasons described in their respective subsections above. Therefore, this impact would be **less than significant**.

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5 REPORT PREPARERS

This chapter of the Initial Study presents the Sonoma County Regional Parks and consultant staff involved with the preparation of this document.

Sonoma County Regional Parks Department

Mark Cleveland.....Project Manager

Emily Podolak.....Park Planner

Ascent Environmental, Inc.

Nanette Hansel.....Principal-in-Charge

Lily Bostrom.....Project Manager

Saba Asghary.....Environmental Planner

Tammie Beyerl.....Senior Ecologist

Ted Thayer.....Biologist

Alta Cunningham.....Cultural Resource Specialist

Dimitri Antoniou, AICP.....Senior Air Quality, Greenhouse Gas, and Noise Analyst

Peter Hoholick.....Air Quality, Greenhouse Gas, and Noise Analyst

Zach Miller, AICP.....Senior Transportation Planner

Jazmin Amini.....Transportation and Environmental Planner

Lisa Merry.....GIS Specialist

Phi Ngo.....GIS Specialist

Brian Perry.....Graphics Specialist

Riley Smith.....Publications

Alta Planning + Design

Brian Burchfield, PLA.....Group Leader/Senior Design Associate

Ryan Booth.....Project Manager

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