

PROPOSED MITIGATED
NEGATIVE DECLARATION / INITIAL STUDY

PREPARED FOR

SONOMA COUNTY
PUBLIC INFRASTRUCTURE

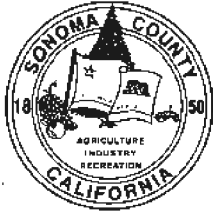
***Russian River near Geyserville – River Road
Bank Stabilization Project, Sonoma County***

COUNTY OF SONOMA PROJECT NO. C21900

August 2024



Prepared by
Sonoma County Permit and Resource Management Department
Environmental Review Division
2550 Ventura Avenue
Santa Rosa, California 95403



Mitigated Negative Declaration

Sonoma County Permit and Resource Management Department

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Publication Date:	August 15, 2024
Public Review Period:	8/15/2024-9/15/2024
State Clearinghouse Number:	TBD
Permit Sonoma File Number:	N/A
Prepared by:	Rich Stabler
Phone:	(707) 565-8352

Pursuant to Section 15071 of the State CEQA Guidelines, this proposed Mitigated Negative Declaration and the attached Initial Study, including the identified mitigation measures and monitoring program, constitute the environmental review conducted by the County of Sonoma as lead agency for the proposed project described below:

Project Name:	Russian River – River Road Bank Stabilization
Project Proponent:	County of Sonoma Public Infrastructure
Lead Agency:	County of Sonoma
Project Location/Address:	Russian River at River Road northeast of Geyserville, in unincorporated Sonoma County
Decision Making Body:	Sonoma County Board of Supervisors
Project Description:	Repair and restore the left (east) bank of the Russian River to prevent ongoing erosion and protect River Road near the community of Geyserville, California.
Initial Study:	See attached. For more information, please contact Rich Stabler, Senior Environmental Specialist, at (707) 565-8352.
Mitigation Measures:	Included in attached Initial Study. The County has agreed to implement all mitigation measures.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors in **Table 1** would be potentially affected by this proposed project, involving at least one impact that is determined to be “Less than Significant with Mitigation” as indicated in the attached Initial Study.

Table 1
Summary of Topic Areas Requiring Mitigation

Topic Area	Abbreviation*	Yes	No
Aesthetics	VIS		X
Agricultural & Forestry Resources	AG		X
Air Quality	AIR	X	
Biological Resources	BIO	X	
Cultural Resources	CUL	X	
Energy	ENERGY		X
Geology and Soils	GEO	X	
Greenhouse Gas Emissions	GHG		X
Hazards and Hazardous Materials	HAZ	X	
Hydrology and Water Quality	HYDRO	X	
Land Use and Planning	LU		X
Mineral Resources	MIN		X
Noise	NOISE	X	
Population and Housing	POP		X
Public Services	PS		X
Recreation	REC		X
Transportation	TRAF	X	
Tribal Cultural Resources	TCR	X	
Utilities and Service Systems	UTL		X
Wildfire	WF	X	
Mandatory Findings of Significance	MFS	X	

RESPONSIBLE AND TRUSTEE AGENCIES

Table 2 lists other public agencies whose approval is required for the proposed project, or who have jurisdiction over resources potentially affected by the proposed project.

Table 2
Agency Approvals and Jurisdiction

Agency	Activity	Authorization
United States Army Corps of Engineers	Dredge and Fill in Navigable waters	Clean Water Act Section 404
Regional Water Quality Control Board (North Coast)	Discharge to Waters of the State	California Clean Water Act Section 401 Water Quality Certification
State Water Resources Control Board	Construction Stormwater Discharges	Clean Water Act Section 402 (National Pollutant Discharge Elimination System) Permit Notice of Intent
California Department of Fish and Wildlife	Lake and Streambed Alteration Agreement	California Fish and Game Code Section 1062
National Oceanic and Atmospheric Administration	Incidental Take of Federally Listed Species	Federal Endangered Species Act
United States Fish and Wildlife Service	Incidental Take of Federally Listed Species	Federal Endangered Species Act
Native American Heritage Commission	Coordination Regarding Cultural and Tribal Resources	
State Historic Preservation Office	Coordination Regarding Cultural and Tribal Resources	

ENVIRONMENTAL FINDING

Based on the evaluation in the attached Initial Study, I find that the proposed project described below will not have a significant adverse impact on the environment, provided that the mitigation measures identified in the Initial Study are included as conditions of approval for the proposed project and a Mitigated Negative Declaration is proposed.

Richard Stabler

Signature

August 14, 2024

Date

Richard Stabler

Printed Name

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Initial Study

Sonoma County Permit and Resource Management Department

2550 Ventura Avenue, Santa Rosa, CA 95403
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I. INTRODUCTION:

Sonoma Public Infrastructure (SPI) proposes to repair and restore the left (east) bank of the Russian River to prevent ongoing erosion and protect River Road in the community of Geyserville, California. The project is centered near 38.721180°, -122.901296°, near approximately 1,000-feet northwest of the intersection of Fay Ranch Road and River Road, and near where River Road turns northward away from the Russian River. The proposed project is a discretionary action and subject to the requirements of the California Environmental Quality Act (CEQA); the County of Sonoma is the CEQA Lead Agency.

This report is the Initial Study required by the CEQA. The report was prepared by the Sonoma County Permit and Resource Management Department (Permit Sonoma) with support from its consultant team. Technical studies provided by qualified consultants are attached to this Initial Study to support the impact discussions and conclusions. Other reports, documents, maps and studies referred to in this document are available for review at the Permit Sonoma office or on the County's website at:

<https://permitsonoma.org/boardscommissionsandcommittees/environmentalreviewcommittee>.

Please contact Rich Stabler, Senior Environmental Specialist, at (707) 565-8352, for more information.

II. SETTING

The study area lies within the Russian River watershed near Geyserville in northern Sonoma County and is accessible off Highway 128 and River Road. The 23.9-acre study area is located west of River Road along the bank of the Russian River, with staging areas extending along River Road on private vineyard properties. The study area for this Initial Study includes the Project repair site with a 200-foot buffer, as well as potential staging area(s). The study area is in a rural residential area and comprises vineyards, disturbed grassland, and ornamental vegetation with riparian woodland along the Russian River bank, and willow forest on the river floodplain.

The study area is in the Northern California Coast Ranges¹ (Miles and Goudey 1997). The Northern California Coast encompasses diverse topography, including mountains, hills, valleys and plains in the Northern California Coast Ranges and portions of the Klamath Mountains. The Northern California Coast Range includes a broad northwest-southeast aligned valley containing the Santa Rosa Plain and the rolling hills between it and the Pacific Ocean. Elevation ranges from sea level up to 900 feet above mean sea level. The climate is typified by temperate to hot and humid, with some marine influence over the coastal hills. Mean annual temperatures range from a high of 92.3 degrees Fahrenheit to a low of 38.2 degrees Fahrenheit, and annual mean precipitation totals 43.13 inches.

The Russian River watershed collects water from the surrounding coastal hills, forests and basins of Sonoma and Mendocino Counties, and conveys water to the Russian River valley. The Russian River is approximately 110 miles long and flows from headwaters in Mendocino County to the Pacific Ocean near Jenner in Sonoma County.

¹ US Forest Service, Table 104a – Ecological Units – Section,
https://www.fs.usda.gov/detail/r5/landmanagement/resourcemanagement/?cid=fsbdev3_048066, accessed July 23, 2024.

III. BACKGROUND

The Russian River, within the study area, has migrated eastward into an area that includes River Road (a county-maintained road [Road # 09018]), riparian forests, and agricultural land. Aerial photographs show the Russian River migrating eastward over the last three decades with dramatic shifts occurring during flood events beginning in 2005. As shown in aerial photographs taken before the 2005 flood event, approximately 150 feet of bank retreat has occurred to date, and approximately twenty-two (22) acres of riparian forest has been lost in that time; much of the protective riparian forest at this location between the Russian River and the surrounding areas (including road infrastructure) has been eroded and washed away. Bank retreat has continued at an average rate of five (5) to twenty (20) feet per year depending on location. Currently, the bank slope is generally vertical along 800-feet of bank with limited to no riparian habitat available and is lacking any significant ecological value. Furthermore, the 2019 flood event washed out approximately forty (40) linear feet of bank and necessitated emergency rock slope protection to be placed along the eroded bank to protect River Road from further erosion. Storms in early 2023 caused more bank retreat and erosion, and the river is currently approaching the edge of River Road and threatens adjacent private property, agricultural lands, and private structures.

In September 2021, SPI applied for a Federal Emergency Management Agency (FEMA) Advance Assistance grant for design, engineering, environmental review, and permitting services to advance a project that would prevent further bank erosion, while reestablishing the bank, deflecting stream flows and providing new riparian area for ecological value. In April 2022, FEMA awarded grant funding for this phase of the proposed project.

IV. PROJECT DESCRIPTION

Project Purpose and Need

The proposed project is needed to protect River Road, agricultural lands, private property, and privately owned structures adjacent to the bank of the Russian River at this location against further damage and/or loss due to continued riverbank migration, and to provide restoration of aquatic and riparian habitats that have been lost due to scour and lateral channel migration.

The purpose of this project is to design and install scour protection and stream bank stabilization measures at the left (east) bank of the Russian River in conformance with established FHWA HEC-23 Bridge Scour and Stream Instability Countermeasures Experience, Selection, and Design Guidance publication. The scour/erosion countermeasures will consist of biotechnical stabilization that incorporates both hard and soft structural elements and natural features to increase local habitat and ecological values.

Project Objectives

- Stabilize the left (east) riverbank and prevent ongoing erosion and bank retreat that continues to threaten public infrastructure, adjacent private property, agricultural lands, and private residences.
- Direct stream flows away from the eastern bank and into the main channel to reduce the risk of future erosion.
- Improve riparian habitat and ecological value along the left (east) bank.

Project Location, Surrounding Area and Zoning

The project area is northeast of downtown Geyserville in Sonoma County, on the left (east) bank of the Russian River. From downtown Geyserville, access to the project area is via the State Route 128 bridge from Geyserville before turning north onto River Road. The project area is approximately 1,700 linear feet of the Russian River bank immediately north of and adjacent to River Road. The site is zoned as Resources and Rural Development (RRD) and is surrounded by land primarily zoned as Land Intensive Agriculture (LIA). The unincorporated community of Geyserville is located less than a mile south of the project site, containing a mix of primarily residential and commercial uses.

Figure 1 shows a map of the regional location of the project. **Figure 2** provides a map of the project vicinity. **Figure 3** shows the project environmental study area. **Figure 4** shows the habitat types in the project area. Figures are attached.



SOURCE: USGS, 2020; ESA, 2023

Russian River - River Road Bank Stabilization Project

Figure 1
Regional Location





SOURCE: Esri, 2021; ESA, 2023

Russian River-River Road Bank Stabilization Project

Figure 2
Project Vicinity



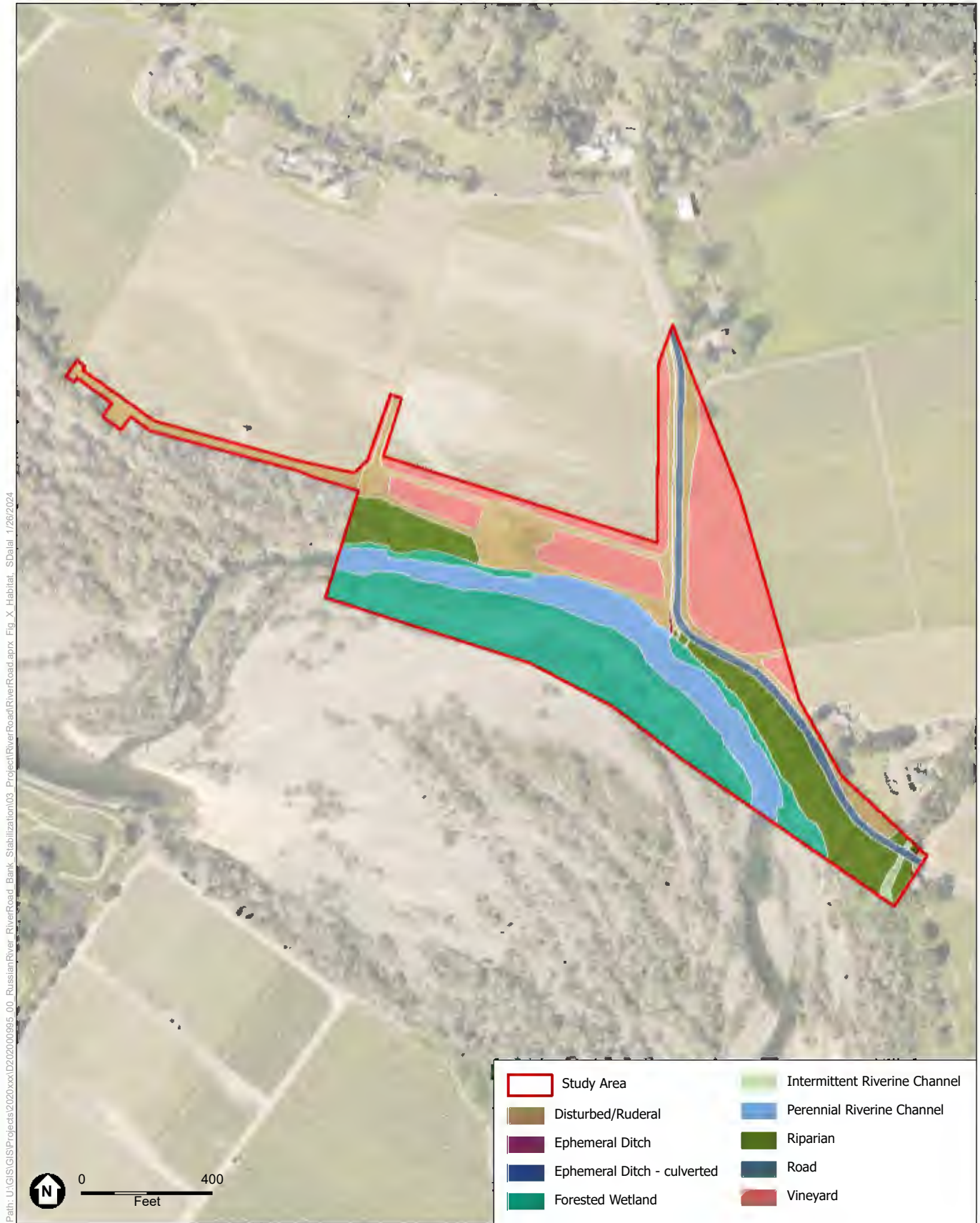


SOURCE: Esri, 2021; ESA, 2023

Russian River-River Road Bank Stabilization Project

Figure 3
Study Area

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SOURCE: Esri, 2021; ESA, 2023

Russian River-River Road Bank Stabilization Project

Figure 4
Habitat Types

Project Overview

The proposed project is being designed under the approved FEMA Advanced Assistance grant and includes planning, design, permitting, and engineering. A separate grant and other funding will follow to construct the proposed project. Implementation would include grading/laying back the existing riverbank, construction and recontouring of an engineered bank (vegetated rock revetment) and installation of bendway weirs (rock vanes), bioengineered soils, biotechnical stabilization elements and revegetation as described in more detail below.

Design and Engineering

To accomplish this phase, the proposed project includes feasibility study reviews, preparation of environmental documents and permit applications, resource agency coordination, right-of-way determinations, a benefit-cost analysis, and preparation of 35 percent, 65 percent, 95 percent, and final engineering and designs for bank stabilization and erosion protection along approximately 1,700 linear feet of the Russian River.

The proposed project will use bendway weirs to deflect and train impinging river flows away from the left (east) bank adjacent to River Road. Bendway weirs are hydraulic structures that will reduce channel velocity near the bank, redirect channel flow away from the left (east) bank and reduce erosion potential at the bank edge. These structures will be integral to the vegetated rock revetment and vegetated soil lifts on the slope. The bendway weirs will be located on the upstream and downstream sides of planting benches. The bendway weirs are submerged under most flows and will allow for revegetation at the planting benches and on the slopes, will allow for bank stabilization, and will allow for habitat enhancements along the bank.

Construction and Installation

After the design is complete, the proposed project would then move to the next phase: construction and implementation of the final engineering and design, mitigation measures, and permit conditions required to provide long-term bank stabilization, erosion protection and habitat enhancement along this reach of the Russian River.

During the excavation work, the riverbank would be cleared and grubbed of surface and sub-surface deleterious matter, including vegetation and previously placed rip rap (emergency stabilization) materials. Rip rap (rock slope protection) from the emergency stabilization repair would be salvaged and re-used for the bendway weir spine. Deleterious materials and non-native vegetation would be removed from the site.

The bank of the Russian River at the project site would be reconstructed to support riparian plantings, to reestablish lost riparian habitat and to effectively transition the riparian areas between the river and the terrestrial bank. The biotechnical bank stabilization approach includes excavation of a keyway into competent soil at the bank toe; backfilling the keyway with large rock as well as the construction of a vegetated rock revetment in the lower to middle zone of the slope; and placement and compaction of engineered fill above and/or behind the rock revetment. The reconstructed riverbank and slope would be replanted with native riparian trees and vegetation (biotechnical stabilization). Biotechnical stabilization would include live cuttings (native trees) and container plant materials (e.g., willow, dogwood, and cottonwood saplings), installation of biodegradable erosion control fabric and broadcast seeding with native seed mix to integrate with the rock-soil materials to establish robust root structures necessary to stabilize exposed soils on the reconstructed bank. In addition, soil bioengineering methods, primarily brush matting and in some cases, pole planting, may be considered at select transitional areas (e.g., up- and downstream conforms) where channel conditions and stream flows are less extreme and allow for 'softer' planting treatments. Instream woody material (IWM) will be integrated and anchored into the planting benches. IWM will be anchored to a large rock below the planting bench. Transitional riprap revetment areas will be constructed upstream and downstream of the bendway weir sections to smooth the hydraulic transition from the bendway weirs back to the natural bank. The transitional sections will be approximately 50 to 100-feet in length.

Construction Access and Staging

Construction access would be from River Road and adjacent parcel(s) along the project corridor to key locations above the riverbank and to the staging and laydown areas. Potential staging and access areas will be on the Munselle property located near the bank erosion area, to the northwest of the Munselle pump house, and river access via the southwest side of the house as shown in **Figure 3**. The proposed project would occur on private property and within the County right-of-way. Temporary construction easements may be required for encroachments onto private parcels outside the County right-of-way to accommodate site access, staging construction materials, laydown areas, and equipment. Currently, it is expected that temporary construction easements may be required for the Munselle, Hinkle, and SYAR properties on the left (east) bank of the river. Potential properties affected include Lands of Munselle Vineyards (APNs 141-190-086, 141-190-090), Lands of Hinkle (APN 141-190-010), Lands of SYAR Family Estate, LLC (APNs 141-190-072, 140-220-024, 140-230-039).

Heavy construction equipment that will be used to complete the riverbank stabilization earthwork and rock placement phases and habitat enhancement project activities include tracked excavators and small bulldozers, rubber-tired loaders and dump trucks. Construction of bank stabilization structures, vegetated rock revetment and bendway weirs, will include small and large tracked excavators and rubber-tired loaders combined with labor forces using hand tools and light mechanical equipment.

Implementation of the revegetation elements will involve small, tracked excavators, rubber-tired loaders and dump trucks, bobcats, crew trucks combined with labor forces using hand tools and light mechanical equipment.

In general, the construction equipment will work from the top of and within the mid-bank area. Some limited equipment access below the top of bank will be necessary to access the channel to complete the installation of bank stabilization structures that extend into the channel from the toe of the bank. It is expected that portions of the river channel would be isolated and water controlled through the construction area, as described below, to accommodate installation of stabilization structures beyond the toe of bank and to protect water quality during in-water work. Placement of coffer dams and/or water controlling structures (as discussed in the dewatering section below) may require short-term equipment use within the channel.

The bendway weirs, vegetated rock revetment, vegetated soil lifts, and planting benches will require placement of riprap, soil, and vegetation elements and plantings. Approximately 18,000 cubic yards of material will be required to construct the structures.

Local traffic control and signs will include typical work area signs. Temporary single lane closures may be required during certain construction activities but are expected to be limited in duration to one to two days. Generally, both lanes on River Road would be open during construction.

Dewatering

The Russian River flows year-round. To construct and implement the proposed project, a portion of the channel will likely require controlling water through the construction area. A temporary dewatering and water control plan will be developed to support in-channel construction activities. Depending on the timing of in-water work and the proposed methods for installation and maintenance of dewatering and water control equipment, development and implementation of a fish capture plan may be required. The plan will be submitted for review and approval to appropriate regulatory agencies including the California Department of Fish & Wildlife (CDFW), the Regional Water Quality Control Board (RWQCB) and Permit Sonoma.

Temporary dewatering and water control to isolate the area of work is expected to involve installation of water-filled bladder dams (or equivalent) or gravel filled bags and plastic sheeting located upstream and downstream from the improvements and around the construction area to divert water around and control water within the construction area. Silt fencing will be installed inside the coffer dam area to control turbidity. Placement of the bladder dams or gravel bags may require minor grading to prepare the channel surface and to 'set' the coffer dam materials. In addition, based on the location of the temporary coffer

dams, it may be necessary to remove limited quantities of brush and vegetation within the channel to support intended function and to prevent damage to the coffer dam.

Schedule

Construction activities, including initial mobilization, staging and de-mobilization of construction equipment, is anticipated to take up to 210 days and would likely occur from late April through September or mid-November, as illustrated in **Table 3**. In water work would take place during mid-June to mid-October and will conclude prior to anadromous fish migrations in the Russian River. Work in Riparian areas would occur during mid-June to mid-October.

**Table 3
Anticipated Construction Schedule**

Task	April				May					June				July				Aug					Sept				Oct					Nov			
	1	2	3	4	1	2	3	4	5	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	1	2	3	4	5	1	2	3	4
Mobilization and Staging Area Prep																																			
In-water Activities																																			
Work Outside of Water																																			

The construction year will depend on when funding for construction is received. Receipt of construction funding to implement the design is currently unknown.

Issues Raised by the Public or Agencies

A referral packet was drafted and circulated to inform and solicit comments from selected relevant local, state and federal agencies; and to special interest groups that are anticipated to take interest in the project.

Other Related Projects

Sonoma County is currently working towards replacing the two-lane bridge over Gill Creek, on River Road, in Geyserville. It is currently expected that construction on that project would begin in June 2025.

List of Anticipated Permits and Approvals

In addition to this CEQA documentation, the Project is anticipated to require the following permits and regulatory approvals prior to construction of the Project:

- US Army Corps of Engineers: Clean Water Act Section 404, Individual Permit
- State Water Resources Control Board, Clean Water Act Section 401, Water Quality Certification
- California Department of Fish and Wildlife Section 1602 Lake and Streambed Alteration Agreement
- Regional Water Quality Control Board: coverage under the Construction General Permit

Right of Way and Easements

The project is anticipated to require right-of-way acquisition through three parcels. Slope easements and temporary construction easements would be required from two properties along the project corridor.

Maintenance and Operation

Following construction, minor operation and maintenance would be required as part of the project. This would include short-term seasonal watering of plantings (3-5 years), checking the performance of the restoration (3-5 years), and maintenance of storm water facilities (on-going, as needed). Vehicle trips associated with operation and maintenance within the project corridor currently occur under existing conditions. The project would not directly result in new daily vehicle trips on local roadways.

V. ISSUES RAISED BY THE PUBLIC OR AGENCIES

Agency /Public Referral

A referral packet was circulated to inform and solicit comments from selected relevant local and state agencies and to special districts and special interest groups that were anticipated to take interest in the project. As of the date of this Initial Study, we have received responses to the project referral from:

1. Don McEnhill from Russian Riverkeeper
Riverkeeper had specific recommendations to improve the project and suggested that we involve NOAA Fisheries (which we have and will continue to do). Riverkeeper also asked that we include them in future project notices and that their interest is to see this restoration be successful and keep the road open.
2. The Northwest Information Center
Advised that the project area has no known resources.
3. Lytton Rancheria
Responded acknowledging receipt of the referral and confirming that the Lytton Rancheria is not requesting consultation.

Tribal Consultation Under AB52

In compliance with PRC Section 21080.3.1(b), the County provided formal notification of the proposed project to California Native American tribal representatives. The County sent letters to the following Native American Tribes on March 1, 2023:

- Lytton Rancheria of California
- Federated Indians of Graton Rancheria
- Cloverdale Rancheria of Pomo Indians
- Dry Creek Rancheria Band of Pomo Indians
- Kashia Pomos Stewarts Point Rancheria
- Middletown Rancheria Band of Pomo Indians
- Mishewal Wappo Tribe of Alexander Valley
- Guidiville Indian Rancheria
- Muwekma Ohlone Tribe San Francisco Bay Area
- Pinoleville Pomo Nation
- Robinson Rancheria of Pomo

Responses were received from the Federated Indians of Graton Rancheria and Lytton Rancheria. Both Tribes were not interested in consulting on the proposed project.

VI. OTHER RELATED PROJECTS

No other related projects entailing bank restoration in the area have been identified.

VII. EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

SPI has agreed to accept all mitigation measures listed in this Initial Study and proposed Mitigated Negative Declaration as conditions of approval for the proposed project, and to obtain all necessary permits, notify all contractors, agents and employees involved in project implementation.

1. AESTHETICS:

Would the project:

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

Comment:

In the project area, River Road provides a variety of landscapes, including valleys and hillsides planted in vineyards, and hillsides covered in oak woodlands and native grasses adjacent to the Russian River. In this reach, the Russian River is in a broad channel with a gravel bottom and some scrubby vegetation on gravel bars within the channel.

According to the Sonoma County General Plan (General Plan, County of Sonoma 2020) land use designations in the project area are Diverse Agriculture (DA), Land Intensive Agriculture (LIA), and Resources & Rural Development (RRD) (Sonoma County 2019). A Scenic Resources overlay exists in the project area, including the river channel, known as a "Scenic Landscape Unit", aimed at preservation of Sonoma County's natural resources. According to the California Department of Conservation Important Farmland Finder Map, the area surrounding the project is designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Urban and Built-Up Land, and Other Land (California Department of Conservation 2022).

The land within and surrounding the project area is comprised of vineyards, foothills, and valley topography in combination with riverside vegetation, water, roadway, and other developed land covers. According to the General Plan, there are scenic resources within the project area; the nearest scenic resource is SR 128, located 0.55 mile southeast of the project area. SR 128 would be used as an access route for the project. The General Plan states that many residents of Sonoma County highly value the variety and beauty of the County's many landscapes as viewed from rural roadways. Motorists can travel from urban centers into orchard and forest covered hills, rolling dairy lands, and scenic valleys planted in vineyards. Preserving these landscapes is important to the character of the County. The General Plan (County of Sonoma 2020) Open Space and Resource Conservation Element identified the following goal to help indicate the viewer sensitivity of the project area:

Goal OSRC-3: Identify and preserve roadside landscapes that have a high visual quality as they contribute to the living environment of local residents and to the County's tourism economy.

The project site is within a Scenic Landscape Unit. The baseline for this analysis is a denuded and failing bank, with continual erosion occurring. This bank failure has so far resulted in the loss of approximately 22 acres of land and riparian forest since approximately 2005, substantially altering the scenic vistas.

A tree inventory was undertaken by ESA (a consultant to the County). The inventory mapped approximately 70 trees of six species, within the project limits (ESA, Tree Survey Memo, April 24, 2024). The species mix are primarily oaks, walnuts, and willows. The project will remove 12 hardwood trees, and approximately 0.22 acre of riparian habitat, consisting primarily of arroyo willows. This is a minor amount of vegetation to be removed and would not substantially alter any scenic vistas. Since the project includes extensive restoration of a highly degraded site, over the time, the site will look substantially different than and improved above the baseline degraded current condition. The minor existing vegetation removal would be less than a quarter of an acre and overall restoration and improvement of the project area is a less than significant impact, and no mitigation is required.

Significance Level: Less than Significant Impact

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

Comment:

River Road in the project area is not a designated or eligible state scenic highway (Caltrans 2023) and there would be no impact.

Significance Level: 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 point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Comment:

A visual impact assessment (VIA) was prepared by ESA, a consultant to the County (ESA, Russian River/River Road Bank Stabilization Project, Visual Impact Assessment, April 2024 (Appendix G)). The VIA generally follows the guidance outlined in the Sonoma County Visual Assessment Guidelines (County of Sonoma 2019). Visual impacts were analyzed by considering public viewing points. Public viewing points include those seen from the public road, River Road, as well as from the channel of the Russian River, which is a popular recreational destination (i.e., canoeing, kayaking, and rafting, etc.). Preliminary identification of key viewpoints was conducted using aerial mapping and project plans. Appropriate viewpoint locations were verified and finalized in the field, and multiple photographs were taken at each viewpoint location. Photographs were evaluated against project plans, and final photograph locations and angles were chosen for their overall representation of key viewpoints, key viewers, and potential visual changes.

To create a truthful visual representation of the River Road Bank Stabilization project, photo-realistic simulations were created by combining photographs of existing site conditions and computer aided design (CAD) files. The VIA incorporated the growth patterns and anticipated trajectory of establishment of specific tree and plant species as well as experience with similar relevant projects to illustrate the site conditions projected out 15 years post-construction.

The following discussion describes the steps used to assess the potential visual impacts of the proposed project:

- Characterize environmental setting;
- Determine key viewpoints;
- Characterize the site's sensitivity;
- Determine visual dominance;
- Prepare photos to illustrate visual impacts;
- Determine significance of visual impacts; and

Environmental Setting: The “baseline” environmental setting of viewpoints is discussed in terms of existing physical features, as well as applicable regulations pertaining to development and scenic resources. The project location and setting provide the context for determining the type and severity of visual impacts. The project setting includes the area of land that is visible from, adjacent to, and outside the highway right-of-way, and is determined by topography, vegetation, and viewing distance.

River Road provides a variety of landscapes, including valleys planted in vineyards, and hillsides covered in oak woodlands and native grasses adjacent to the Russian River (Sonoma County 2019). In this reach, the Russian River is in a broad channel with a gravel bottom and some scrubby vegetation on gravel bars within the channel.

According to the Sonoma County General Plan (General Plan) land use designations in the project area are Diverse Agriculture (DA), Land Intensive Agriculture (LIA), and Resources & Rural Development (RRD) (Sonoma County 2019). A Scenic Resources overlay exists in the project area, including the river channel, known as a “Scenic Landscape Unit”, aimed at preservation of Sonoma County’s natural resources. According to the California Department of Conservation Important Farmland Finder Map, the area surrounding the project is designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Urban and Built-Up Land, and Other Land (California Department of Conservation 2022).

The land within and surrounding the project area is comprised of vineyards, oak woodlands, native grass covered foothills, and valley topography in combination with riverside vegetation, water, roadway, and other developed land covers. According to the General Plan, there are scenic resources within the project area; the nearest scenic resource is SR 128, located 0.55 mile southeast of the project area. SR 128 would be used as an access route for the project. The General Plan states that many residents of Sonoma County highly value the variety and beauty of the County’s many landscapes as viewed from rural roadways. Motorists can travel from urban centers into orchard and forest covered hills, rolling dairy lands, and scenic valleys planted in vineyards. Preserving these landscapes is important to the character of the County. The General Plan Open Space and Resource Conservation Element identified the following goal to help indicate the viewer sensitivity of the project area:

Goal OSRC-3: Identify and preserve roadside landscapes that have a high visual quality as they contribute to the living environment of local residents and to the County’s tourism economy.

The following analysis assumes that the project site is within a Scenic Landscape Unit.

Key Viewpoints: Two key viewpoints were selected that would most clearly illustrate visual impacts attributable to the project. These two key viewpoints represent potential public views of the project site (see **Figures 5 and 6**).

Viewpoint 1 – Russian River Looking Northwest

Viewpoint 1 is from the channel of the Russian River looking northwest toward the project. (see **Figure 5**). This view was selected to illustrate the appearance of the project’s visual elements as they would appear to viewers recreating on the Russian River. The sensitive viewer group at this location would primarily be on-water recreationalists, such as kayakers and rafters. The visual sensitivity at this viewpoint, as defined in **Table VIS-1** below, is high. The area surrounding the project site is designated as a scenic resource in the County’s General Plan, it is located in a Scenic Landscape Unit which is an area that would fall under Goal OSRC-3 considering the high visual quality of the area contributing to the living environment and County’s tourism economy (i.e., wineries, vineyards).

The foreground is defined as the distance between the viewer and 0.25 to 0.5 mile. Landscape detail is most noticeable, and objects generally appear most prominent when seen in the foreground. The Russian River and riverbank are dominant visual features in the immediate foreground. Other visual features seen from this viewpoint include the vineyards and foothills.

Viewpoint 2 – River Road Looking Southwest

Viewpoint 2 is located on River Road facing southwest toward the project (see **Figure 6**). This view was selected to illustrate the appearance of the project’s visual elements as they would appear to viewers traveling southwest on River Road, a public roadway. The sensitive viewer group at this location would be motorists, who would be area residents or tourists. Project construction activities, including ingress/egress points, would be visible from this viewpoint. Once construction is completed, the visual change from this viewpoint would be limited to the appearance of the restoration plantings as they mature. The visual sensitivity at this viewpoint, as defined in **Table VIS-1** below, is high. The area surrounding the project site is designated as a scenic resource in the County’s General Plan, it is located in a Scenic Landscape Unit which is an area that would fall under Goal OSRC-3 considering the high visual quality of the area contributing to the living environment and County’s tourism economy (i.e., wineries, vineyards).

River Road, vineyards, and vegetation along the riverbank are dominant visual features in the immediate foreground. Other visual features seen from this viewpoint include the foothills beyond the river channel.

Visual Sensitivity: The project site is within a rural land use designation and a Scenic Landscape Unit. There is rural development in the area of the project site, as well as natural features (e.g., the river corridor) that provide aesthetic value. While the area surrounding the project site has the qualities supporting the Scenic Landscape Unit designation, the project site itself is visually inconsistent with this designation because of the presence of rock slope protection (riprap) along the stream bank coupled with the loss of riparian habitat through ongoing stream bank erosion. Given this visual inconsistency with Scenic Landscape Unit designation in combination with the limited viewing opportunities, limited project boundaries and physical extent of project-related activities, the project site receives a “high” rating based on the criteria in Table VIS-1.

**Table VIS-1
Visual Sensitivity**

Sensitivity	Characteristics
Low	The site is within an urban land use designation and has no land use or zoning designations protecting scenic resources. The project vicinity is characterized by urban development or the site is surrounded by urban zoning designations and has no historic character and is not a gateway to a community. The project site terrain has visible slopes less than 20 percent and is not on a prominent ridgeline and has no significant natural vegetation of aesthetic value to the surrounding community.
Moderate	The site or portion thereof is within a rural land use designation or an urban designation that does not meet the criteria above for low sensitivity, but the site has no land use or zoning designations protecting scenic resources. The project vicinity is characterized by rural or urban development but may include historic resources or be considered a gateway to a community. This category includes building or construction sites with visible slopes less than 30 percent or where there is significant natural features of aesthetic value that is visible from public roads or public use areas (i.e., parks, trails etc.).
High	The site or any portion thereof is within a land use or zoning designation protecting scenic or natural resources, such as General Plan designated scenic landscape units, coastal zone, community separators, or scenic corridors. The site vicinity is generally characterized by the natural setting and forms a scenic backdrop for the community or scenic corridor. This category includes building and construction areas within the SR designation located on prominent hilltops, visible slopes less than 40 percent or where there are significant natural features of aesthetic value that are visible from public roads or public use areas (i.e., parks, trails etc.). This category also includes building or construction sites on prominent ridgelines that may not be designated as scenic resources but are visible from a designated scenic corridor.
Maximum	The site or any portion thereof is within a land use or zoning designation protecting scenic resources, such as General Plan designated scenic landscape units, coastal zone, community separators, or scenic corridors. The site vicinity is generally characterized by the natural setting and forms a scenic backdrop for a designated scenic corridor. This category includes building or construction sites within the scenic resource designation on or near prominent ridgelines, visible slopes greater than 40 percent or where there are significant natural features of aesthetic value that are visible from a designated scenic corridor.

Visual Dominance: The visual dominance of the project was assessed by comparing the contrast of the following elements or characteristics of the project with its surroundings and giving a rating of inevident, subordinate, co-dominant, or dominant (see **Table VIS-2**):

- Form: shape, geometry, complexity
- Line: the edge of the shape, boldness, complexity of silhouette, orientation
- Color: reflectivity, hue (actual color), value (dark or light)
- Texture: surface characteristics, randomness, grain (fine or coarse)
- Night Lighting



SOURCE: ESA, 2023



Figure 5
River Road Bank Stabilization Project (Existing Conditions)
Russian River - view looking northwest



0202000995.00

SOURCE: ESA, 2023



Figure 6
River Road Bank Stabilization Project (existing conditions)
River Road - view looking southwest

**Table VIS-2
Visual Dominance**

Dominance	Characteristics
Dominant	Project elements are strong – they stand out against the setting and attract attention away from the surrounding landscape. Form, line, color, texture, and night lighting contrast with existing elements in the surrounding landscape.
Co-Dominant	Project elements are moderate – they can be prominent within the setting but attract attention equally with other landscape features. Form, line, color, texture, and night lighting are compatible with their surroundings.
Subordinate	Project is minimally visible from public view. Element contrasts are weak – they can be seen but do not attract attention. Project generally repeats the form, line, color, texture, and night lighting of its surroundings.
Inevident	Project is generally not visible from public view because of intervening natural land forms or vegetation.

The project vicinity is comprised of vineyards, foothills, and valley topography in combination with riverside vegetation, water, roadway, and other developed land covers, which result in a mixture of form, line, color, and textures. Nighttime lighting is limited to lights outside of rural residences. The primary elements of the project that would be visible include the newly planted vegetation and rock weirs.

Viewpoint 1 – Russian River Looking Northwest

The form and line of the elements at Viewpoint 1 would remain relatively unchanged as the project would not substantially change the general shape (i.e., topography) of the river bank. There would be bendway weirs added to the bank and extending into Russian River, with planted trees and vegetation to provide stability and habitat (see **Figure 7**). The vegetation would change the color and visual texture of the project site by replacing the existing bank erosion, rock slope protection and exposed soils. No lighting would be added in this area. The visual dominance of the project elements at this viewpoint, when compared with the existing setting, is considered co-dominant, as the restored bank would add bendway weirs to the bank and extending into the river channel, which would be visually prominent as shown in Figure 7. However, the new plantings and volunteer vegetation would soften that prominence as it would visually integrate the proposed project into the surrounding existing banks.

Viewpoint 2 – River Road Looking Southwest

Project construction activities, including ingress/egress points, would be visible from this viewpoint. Once construction is completed, the form and line of the elements at Viewpoint 2 would remain similar to the existing setting. From Viewpoint 2, the bendway weirs and lower vegetation planted for bank and soil stabilization would not be visible. The vegetation with a higher profile, (i.e., trees, tall shrubs) would be visible from Viewpoint 2 on River Road (see **Figure 8**). This vegetation would add color and visual texture to the view; however, it would be visually consistent and tie in with the existing vegetation visible from Viewpoint 2. No lighting would be added in this area. Given the limited viewing opportunities at the project site when construction is completed, the visual consistency of the project elements visible from this viewpoint, when compared with the existing setting, is considered co-dominate.

Visual Impacts: The determination of visual impact significance was made by:

- Establishing the level of visual sensitivity of the site using the criteria discussed Table VIS-1.
- Characterizing the visual dominance of the project by comparing the project’s form, line, color, texture, and lighting against that of the surrounding area as described in Table VIS-2.
- Determining significance of the visual impact by comparing site sensitivity with visual dominance of the project in accordance with **Table VIS-3**.

**Table VIS-3
Visual Impacts**

Sensitivity	Dominant	Co-Dominant	Subordinate	Subordinate
Maximum	Significant	Significant	Significant	Less than significant
High	Significant	Significant	Less than significant	Less than significant
Moderate	Significant	Less than significant	Less than significant	Less than significant
Low	Less than significant	Less than significant	Less than significant	Less than significant

The project area includes the Russian River and River Road in a rural area comprised mostly of agricultural land and rural residential properties. There are designated scenic resources located in the project area including SR 128, Geyserville Avenue, and Canyon Road; in addition, the Russian River also has scenic qualities for sensitive viewer groups, such as on-water recreationalists and motorists. The project would not be seen from Geyserville Avenue or Canyon Road.

The project would be constructed using materials and vegetation similar to those already present at the project site. Tree and vegetation removal would be limited to the project work area and would be minimal. There would be no lighting or other features that would result in a substantial increase in light or glare in the landscape.

Project construction would result in temporary visual impacts, including vegetation removal, grading activities, revegetation, and equipment staging. Construction activities could also result in the generation of dust and other visual intrusions. Construction is anticipated to last approximately seven months; the impacts would be temporary during this period. Vegetation removal and revegetation would result in impacts lasting for a longer period, until the replacement vegetation is established and mature (this assessment assumes a period of 15 years). As the restoration plantings mature, they would become more visually consistent with surroundings and the visual impact associated with construction activities and riverbank stabilization would lessen over time as shown in Figure 7.

As stated above, the sensitivity of the project area from Viewpoint 1 is considered high. The project would include the construction of bank stabilization and erosion protection along the Russian River in the form of a reconstructed bank and bendway weirs protruding into the river channel to redirect flows away from the bank. The reconstructed bank and bendway weirs would be revegetated to blend into the visual surroundings. These new features would be co-dominant when compared with the existing visual setting of the site, as they would blend into the adjacent visual setting. The new features would be compatible with the surrounding landscape and not visually dominate the site. When compared with the existing visual setting, upon maturity, the new vegetation and bendway weirs would not present a substantial visual change to the existing conditions. During the intervening period as the new vegetation establishes and matures, the project site would still exhibit visual contrast resulting from construction activity and disturbance, though it would be more consistent with the visual surroundings than the current rock bank protection shown in Figure 8. This visual contrast would gradually lessen over time as the new vegetation grows in and successfully matures, the project site would visually blend in and be consistent with the surrounding visual environment. At this time specific success criteria have not been established for this project, but is anticipated as part of the regulatory consultation process and specific environmental permitting conditions. Therefore, based on the bank restoration and revegetation associated with the proposed project, long-term visual impacts would be less than significant (see **Table VIS-4**).

**Table VIS-4
Thresholds of Significance for Visual Impact Analysis**

Viewpoint	Sensitivity	Dominance	Visual Impact
Viewpoint 1	High	Co-Dominant	Significant
Viewpoint 2	High	Co-Dominant	Significant



Heading
-Project Boundary
Sensitive Uses

SOURCE: ESA, 2023



Figure 7
River Road Bank Stabilization Project (+15 years)
Russian River - view looking northwest



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SOURCE: ESA, 2023



Figure 8
River Road Bank Stabilization Project (+15 years)
River Road- view looking southwest

As stated above, the sensitivity of the project area from Viewpoint 2 is considered high. The project, as described above, would be co-dominant when compared with the existing visual setting of the site. Bank stabilization including installation of the bendway weirs would not be visible from Viewpoint 2, and the new vegetation at the top of bank would be compatible with surrounding landscape and would be similar to existing (or pre-project conditions (see Figure 7). Therefore, visual impacts associated with project implementation would be significant (see Table VIS-4). However, even though using this methodology indicates a significant visual impact, the project, as proposed would restore the streambank and add native vegetation, the result would have an overall positive permanent visual impact that would aesthetically blend into the existing surroundings and would not require mitigation.

The project area is in a rural setting, and visual sensitivity is considered high. Implementation of the project would result in minimal visual changes along River Road and more prominent visual changes in this reach of the Russian River. Visual changes would result primarily from restoration activities associated with the project including installation of native trees, plant materials and bendway weirs along the Russian River. However, when compared with the existing visual setting, which includes River Road, restoration activities associated with the project including installation of native trees, plant materials, planting benches, moderate slopes and bendway weirs in the long-term would not present a substantial visual change to the existing environment. Based on the sensitivity and dominance levels of project elements, visual impacts would be less than significant.

Cumulative impacts are those resulting from past, present, and reasonably foreseeable future actions, combined with the potential visual impacts of this project. The Gill Creek Bridge, located about a mile north on River Road, is planned for replacement in 2026. The existing bridge is a simple concrete slab bridge and will be replaced in-kind but with a seismically stable design. There are not additional planned projects in the vicinity of the project area; therefore, cumulative visual impacts are not expected.

Significance Level: Less than Significant Impact

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

Comment:

Based on the type and extent of work to be performed, nighttime construction is not proposed for the project and would only be performed under the approval of the County's Resident Engineer. Any such work would be conditionally required to avoid glare that would be a hazard to vehicles and to avoid light trespass onto adjacent residential uses through means and methods to light a work area while limiting light spill onto adjoining property. Following construction, the proposed project is restoration and revegetation of the streambank and does not include the installation of streetlights or other new lighting. No new permanent lighting would result that would create a new source of light or glare. There would be no impact.

Significance Level: No Impact

2. AGRICULTURE AND FOREST RESOURCES:

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

Would the project:

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

Comment:

The potential properties affected include Lands of Munselle Vineyards (APNs 141-190-086, 141-190-090), Lands of Hinkle (APN 141-190-010), and Lands of SYAR Family Estate, LLC (APNs 140-230-039).

The project would permanently impact 0.45 acres for the vineyard area within lands considered to be Prime Farmland. Therefore, the project would convert Prime Farmland to nonagricultural uses; however, the amount would be very small and this area and likely more would be lost to erosion from the river without the project, and all remaining land on the properties would remain available for agricultural uses.

Significance Level: Less than Significant

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

Comment:

Construction and Operation

There are no Williamson Act contracts within or surrounding the project area; therefore, the project would not conflict with a Williamson Act contract. The project would require right of way from parcels zoned for agricultural use; however, the amount of acquisition, approximately 0.74 acres, would be minimal (less than one percent of the total land), and all remaining land on the properties would remain available for agricultural uses (see **Table AG-1**). The project will allow for more reliable year-round access to these properties, which would be expected to support the existing agricultural uses. Therefore, the project would not substantially conflict with existing zoning for agricultural use, or a Williamson Act contract. Therefore, no impact would result.

Significance Level: Less than Significant

**Table AG-1
Right-of-Way Impacts within Farmlands**

Assessor's Parcel Number	Right of Way Acquisition (Permanent Easements) (Acres)	Total Acreage of Parcel	Farmland Classification	Prescriptive Right of Way Acquisition (Acres)	Temporary Construction Easement (Acres)
141-190-086, 141-190-090	0 2.24	18.98, 25.18	Farmland of Statewide Importance, Prime Farmland, Unique Farmland, Other Land, Urban and Built-Up Land	0 0	0.85, 0.74
141-190-010	1.03	3.00	Prime Farmland, Unique Farmland, Other Land	0	0
140-230-039	0.09	79.63	Other Land, Unique Farmland	0	0
TOTAL	3.36	126.79		0.00	1.59

- 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))?**

Comment:

Construction and Operation

There are no properties located along River Road in the project area that are currently zoned forest land, timberland, or timberland zoned for production. Therefore, the proposed project would not conflict with or cause rezoning of such lands. No impact would result.

Significance Level: No Impact

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

Comment:

Construction and Operation

No forest land is present in the project area. Therefore, no loss or conversion of forest land would result.

Significance Level: No Impact

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

Comment:

Construction and Operation

The proposed project would be located along the Russian River along River Road. The proposed project would not result in any changes in the existing environment, such as limiting access to agricultural uses, that may result in conversion of farmland to non-agricultural uses. No impact would occur.

Significance Level: No Impact

3. AIR QUALITY:

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

Would the project:

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

Comment:

Construction and Operation

The Project site is in the North Coast Air Basin (NCAB) under the jurisdiction of the Northern Sonoma County Air Pollution Control District (NSCAPCD), which covers the northern portion of Sonoma County. The NCAB is currently in attainment for all criteria air pollutants at both the state and federal level. The NSCAPCD does not have an adopted air quality plan because it is in attainment for all federal and state criteria pollutants. In addition, the project, as proposed is temporary (up to 7 months for construction) and would not conflict with or obstruct implementation of the applicable air quality plan. Therefore, there would be no impact.

Significance Level: No Impact

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

Comment:

Dust Emissions: The NSCAPCD jurisdiction is a region that is in attainment for criteria pollutants under applicable state and federal ambient air quality standards; however, PM₁₀ is a criteria pollutant that is closely monitored in the NSCAPCD. Readings in the NSCAPCD area have exceeded state standards on several occasions in the last few years. The high PM₁₀ readings occurred in the winter and are attributed to the seasonal use of wood burning stoves. The proposed project will have no long-term effect on PM₁₀, because all surfaces will be paved, gravel, revegetated or otherwise treated to stabilize bare soils; operational dust generation will be insignificant or immeasurable. Moreover, residential developments with wood burning stoves are not part of the proposed project. However, there could be a significant short-term emission of dust (which would include PM_{2.5} and PM₁₀) during construction. While these emissions could be significant at the project level, site BMPs and Mitigation Measure AIR-1 for controlling dust would minimize construction-related airborne particulates to a less than significant amount.

Criteria Air Pollutants: Although the project is located in the NSCAPCD, the Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines were applied to construction emissions. The CEQA Guidelines do not include a specific screening level size for restoration projects, such as the proposed project. The Project's construction emissions were quantified using the California Emissions Estimator Model (CalEEMod) software (version 2022.1.1.21). CalEEMod is a statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify air quality emissions, including greenhouse gas (GHG) emissions, from land use projects. CalEEMod applies inherent default values for various land uses, including construction data, trip generation rates, vehicle mix, trip length, average speed, compliance with the California Building Standards Code. Where project-specific information is available, such information is applied in CalEEMod (Appendix A). Accordingly, the project's CalEEMod modeling assumes the following site design features and project-specific information:

- Start dates and phasing schedule.
- Type and number of off-road equipment per phase.

- Number of days each piece of equipment will be used.
- Quantity of exported and imported material; and
- Number of worker and haul trucks per phase.

Table AIR-1 presents construction emissions estimated with CalEEMod. As shown in the table, the Project's construction emissions would not exceed the significance thresholds set by BAAQMD for ROG, NO_x, PM₁₀, and PM_{2.5}.

**Table AIR-1
Construction Emissions Summary**

Construction Year 2025	ROG	NO _x	PM ₁₀ (Exh)	PM _{2.5} (Exh)
Proposed Project Emissions	1.05	9.85	0.35	0.33
BAAQMD Thresholds	54	54	82	54
Exceeds threshold?	No	No	No	No
SOURCE: Data compiled by Environmental Science Associates, February 2024				

The impact to air quality is considered to be potentially significant but with implementation of the BAAQMD's recommended basic construction measures identified in Mitigation Measure AIR-1, the impact of construction-related criteria air pollutants would be less than significant.

Mitigation Measure AIR-1: To limit dust, criteria pollutants, and precursor emissions associated with the construction activity, Sonoma County will include the following Bay Area Air Quality Management District (BAAQMD) recommended Basic Construction Measures in construction contract specifications for the project:

- Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas and unpaved access roads) shall be watered three times per day;
- Haul trucks transporting soil, sand, or other loose material off-site shall be covered or shall have at least two feet of freeboard;
- Visible mud or dirt tracked-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 shall be prohibited;
- Vehicle speeds on unpaved areas shall be limited to 15 miles per hour;
- Paving shall be completed as soon as possible after trenching work is finished;
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points;
- 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; and
- A publicly visible sign shall be posted with the telephone number and person to contact at the County 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 Level: Potentially Significant Unless Mitigated

c) Expose sensitive receptors to substantial pollutant concentrations?

Comment:

Under CEQA, residences, schools, daycare centers, and healthcare facilities such as hospitals or retirement and nursing homes are considered sensitive receptors. The closest sensitive receptors to the Project are residences approximately 120 feet, 200 feet, and 425 feet from the project area.

A screening-level Health Risk Assessment (HRA) was conducted to evaluate the potential for impact to sensitive receptors within the project area. The screening-level HRA can be found as part of the Air Quality and Greenhouse Gas Technical Analysis prepared for the project (ESA, April 2024 (Appendix A)). The screening-level HRA found that potential health risks do not exceed the BAAQMD thresholds (although the project is in the NSCAPCD, the BAAQMD thresholds are applied here). Thus, the project construction activities would not expose sensitive receptors to substantial toxic air contaminants concentrations, and construction-related health impacts would be less than significant.

Significance Level: Less than Significant

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

Comment:

Construction activities often include diesel-fueled equipment and heavy-duty trucks, which could create odors associated with diesel fumes that may be considered objectionable. However, construction is temporary (approximately 7 months) construction equipment would operate intermittently throughout the course of a day, and it would likely only occur over portions of the site at a time. Considering the short-term and temporary nature of construction activities, as well as the intermittent nature of the operation of construction equipment (one or two pieces of equipment operating simultaneously, the project would not be expected to create objectionable odors affecting a substantial number of people.

Once constructed, maintenance of the Project would not lead to odor-generating activities because, as previously mentioned, the Project does not include potential odor-generating land uses. For these reasons, construction and operation of the Project would not result in odorous emissions adversely affecting a substantial number of people, and impacts would be less than significant.

Significance Level: Less than Significant

4. BIOLOGICAL RESOURCES:

Environmental Setting

The study area lies within the Russian River watershed near Geyserville in northern Sonoma County. The 23.9-acre study area is located west of River Road along the bank of the Russian River, with staging areas located on private vineyard property. The study area for this assessment includes the Project repair site with a 200-foot buffer, as well as potential staging area(s). The study area is accessible off Highway 128 and River Road. The Project study area is located in a rural residential area and comprises vineyards, disturbed grassland, and ornamental vegetation with riparian woodland along the Russian River bank, and willow forest on the river floodplain (**Figure 4, Habitat**).

The Russian River watershed collects water from the surrounding coastal hills, forests and basins of Sonoma and Mendocino Counties, and conveys water to the Russian River valley. The Russian River is approximately 110 miles long overall and flows from headwaters in Mendocino County to the Pacific Ocean near Jenner in Sonoma County.

Natural Communities and Wildlife Habitats

Natural communities are assemblages of plants found in environments which vary based on soil, hydrology, rainfall, humidity, soil and water salinities, wind exposure, and altitude. Natural communities generally correspond to wildlife habitats that are occupied by an associated suite of animal species. The study area supports the following general vegetation community and wildlife habitat associate types: riparian forest, willow forest, perennial stream, annual grassland, and developed/disturbed areas (Figure 4). Each community and its wildlife habitat associations are described in greater detail in the subsequent subsections below.

Riparian Forest

Riparian forest occurs along the banks of the Russian River. This vegetation is dominated by an overstory of Coast live oak valley oak California bay laurel, white alder, and arroyo willow. The understory of the riparian forest comprises poison oak, California blackberry, and snowberry as well as the non-native invasive Himalayan blackberry (California Invasive Plant Council [Cal-IPC] “high” [2023]), bigleaf periwinkle (Cal-IPC “moderate” [2023]), and English ivy Cal-IPC “high” [2023]), *Arundo donax*. This natural community is considered to be sensitive by CDFW, as coast live oak and arroyo willow riparian woodland (CDFW 2023b).

Wildlife species common to riparian forest include black phoebe (*Sayornis nigricans*), Cooper’s hawk (*Accipiter cooperii*), sharp-shinned hawk (*Accipiter striatus*), red-shouldered hawk (*Buteo lineatus*), warbling vireo (*Vireo gilvus*), Bewick’s wren (*Thryomanes bewickii*), western flycatcher (*Empidonax difficilis*), black-headed grosbeak (*Pheucticus melanocephalus*), northern flicker (*Colaptes auratus*), orange-crowned warbler (*Oreothlypis celata*). Common and special-status bats such as pallid bat (*Antrozous pallidus*) may also roost in tree cavities or beneath the bark of the mature trees and terrestrial mammals, such as deer mouse (*Peromyscus* sp.) and dusky-footed woodrat (*Neotoma fuscipes*) may forage and create nests in the forest understory of this community. Amphibians that often use the riparian woodlands include California slender salamander (*Batrachoseps attenuatus*), California newt (*Taricha torosa*) foothill yellow-legged frog (*Rana boylei*), and rough-skinned newt (*Taricha granulosa*).

Willow Forest

Within the floodplain of the Russian River are gravel bars dotted with sandbar willow (*Salix exigua*), arroyo willow, Fremont cottonwood (*Populus fremontii*), mulefat (*Baccharis salicifolia*), and, nearer to the wetted channel, water smartweed (*Persicaria amphibia*). These in-stream freshwater forested wetlands are located below the top of bank and are seasonally flooded at high water. This natural community is considered sensitive by CDFW, as arroyo willow and sandbar willow thickets (*Salix lasiolepis* / *Salix exigua*) (CDFW 2023b). Willow forests typically provide cover and nesting habitat for small birds such as bushtit (*Psaltriparus minimus*), common yellowthroat (*Geothlypis trichas*), and Bewick’s wren, and amphibians, as well as reptiles and small mammals during the dry season.

Annual Grassland

Annual grassland is located along vineyard margins and in patches along the edge of River Road. Annual grasslands are dominated by non-native grasses and forbs. Common grass species observed in this community include wild oat (*Avena barbata*), wall barley (*Hordeum murinum*), and ripgut brome (*Bromus diandrus*). Common non-native forbs observed include summer mustard (*Hirschfeldia incana*), Italian thistle (*Carduus pycnocephalus*), bristly oxtongue (*Helminthotheca echioides*), wild radish (*Raphanus raphanistrum*) and milk thistle (*Silybum marianum*). Annual grassland provides little cover for wildlife, yet numerous species forage and breed in this habitat, including many bird, reptile, and small mammal species.

Would the project:

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

Regulatory Framework

Special-Status Species

Special-status species include those plant and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the federal Endangered Species Act (ESA) or California Endangered Species Act (CESA). These acts afford protection to both listed and proposed to be listed species. In addition, California Department of Fish and Wildlife (CDFW) Species of Special Concern, which are species that face extirpation in California if current population and habitat trends continue, U.S. Fish and Wildlife Service (USFWS) Birds of Conservation Concern, and CDFW special-status invertebrates, are all considered special-status species. Although CDFW Species of Special Concern generally have no special legal status, they are given special consideration under CEQA. In addition to regulations for special-status species, most birds in the United States, including non-status species, are protected by the Migratory Bird Treaty Act of 1918. Plant species on California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants with California Rare Plant Ranks (Rank) of 1, 2 and 4 are also considered special-status plant species and must be considered under CEQA. Bat species designated as "High Priority" by the Western Bat Working Group (WBWG) qualify for legal protection under Section 15380(d) of the CEQA Guidelines. Species designated "High Priority" are defined as "imperiled or are at high risk of imperilment based on available information on distribution, status, ecology and known threats."

Endangered Species Act

The Endangered Species Act (ESA) of 1973, as amended (16 USC 1531 et seq.) was enacted to provide a means to identify and protect endangered and threatened species. Under Section 9 of the ESA, it is unlawful to take any listed species. "Take" is defined as harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting a listed species. "Harass" is defined as an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering. "Harm" is defined as an act which actually kills or injures fish or wildlife and may include significant habitat modification or degradation which actually kills or injures fish or wildlife by significantly impairing essential behavioral patterns, including breeding, spawning, rearing, migrating, feeding, or sheltering. Actions that may result in "take" of a federal-listed species are subject to USFWS or National Marine Fisheries Service (NOAA Fisheries) permit issuance and monitoring. Section 7 of the ESA requires federal agencies to ensure that any action authorized, funded, or carried out by the agency is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of designated critical habitat for such species. Any action authorized, funded, or carried out by a federal agency or designated proxy (e.g., Army Corps of Engineers) which has potential to affect listed species requires consultation with USFWS or NOAA Fisheries under Section 7 of the ESA.

California Endangered Species Act

The CESA includes provisions for the protection and management of species listed by the State of California as endangered, threatened, or designated as candidates for such listing (California Fish and Game Code (FGC) Sections 2050 through 2085). The CESA generally parallels the main provisions of the ESA and is administered by the CDFW, who maintains a list of state threatened and endangered species as well as candidate species. The CESA prohibits the “take” of any species listed as threatened or endangered unless authorized by the CDFW in the form of an Incidental Take Permit. Under FGC, “take” is defined as to “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.”

Critical Habitat

Critical habitat is a term defined in the ESA as a specific geographic area that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection. The ESA requires federal agencies to consult with the USFWS to conserve listed species on their lands and to ensure that any activities or projects they fund, authorize, or carry out will not jeopardize the survival of a threatened or endangered species. In consultation for those species with critical habitat, federal agencies must also ensure that their activities or projects do not adversely modify critical habitat to the point that it will no longer aid in the species’ recovery. In many cases, this level of protection is similar to that already provided to species by the ESA jeopardy standard. However, areas that are currently unoccupied by the species, but which are needed for the species’ recovery are protected by the prohibition against adverse modification of critical habitat.

Comment:

Construction and Operation

SPECIAL-STATUS PLANT SPECIES

The potential for the project area to support special-status plant or wildlife species was assessed using database results, previous biological reports in the regional vicinity, and the findings of the May 2, 2023, reconnaissance survey and August 1, 2023, aquatic resources delineation survey and report (Appendix C). Focused, in-season rare plant surveys were also performed as part of this assessment. Low (unlikely), moderate, or high potential for species occurrence in the study area was determined based on previous special-status species’ record locations, their degree of connection or isolation to/from the study area, known suitable geographical and elevation ranges, and current site conditions. No special-status plants were determined to have moderate to high potential to occur within or adjacent to the study area, due to the dense undergrowth of poison oak and blackberry in the riparian woodland, and the prevalence of non-native grasses and ornamental landscape plants elsewhere in the study area. Two plants, Franciscan onion and congested-headed hayfield tar plant) had low potential to occur, but neither was seen during the rare plant surveys on May 2 and August 1, 2023, during the typical blooming periods for these two species.

SPECIAL-STATUS WILDLIFE SPECIES

AMPHIBIANS AND REPTILES

Three amphibian Species of Special Concern, foothill-yellow legged frog, California giant salamander, and red-bellied newt are considered have a moderate potential to occur within the project area. In addition, one special status reptile (Western pond turtle) has a high potential to occur. This species is considered to have high potential to occur in the aquatic habitat in the study area, particularly when woody debris, emergent rocks, and other basking sites are present. Riparian and grassland habitat adjacent to the Russian River could provide marginal nesting habitat for this species. Project construction activities would clear, grub, disrupt and destroy existing conditions and habitat that supports WPT and this impact is considered potentially significant.

The impact is considered potentially significant. Mitigation Measure BIO-1 would reduce the impact on special status amphibians and reptiles to a less-than-significant level.

NESTING BIRDS

The riparian forest, willow forest, and grassland communities, as well as the landscaping trees scattered throughout and near the study area, provide nesting and foraging habitat for a variety of resident and migratory birds in mature trees, dense shrubs, in tall weedy plants, or on the ground. In addition to those described above, raptor species that may nest in the study area could include red-tailed hawk, red-shouldered hawk, western screech owl, great horned owl, and northern pygmy owl. Passerine species that could nest in the area may include Anna's hummingbird, Bewick's wren, American crow, spotted towhee, dark-eyed junco, and western meadowlark among many others. The federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code protect raptors, native migratory birds, and most breeding birds that would occur in the study area and/or nest in the surrounding vicinity. The above-mentioned species, as well as other common passerines, may potentially be affected by the proposed project due to tree removals and habitat disturbance during construction. The impact is considered potentially significant. Mitigation Measure BIO-2 would reduce the potential impact to these species as well as migratory and common bird species that may potentially nest in the project area to a less-than-significant level.

ANADROMOUS FISH SPECIES

The Russian River hosts spawning runs of federally listed salmonids, including steelhead, Coho Salmon, and Chinook Salmon, as well as critical habitat for steelhead and Chinook. The project area is not within critical habitat for Coho Salmon. Coho Salmon are unlikely to spawn or rear in the mainstem Russian River but use it seasonally as a migration corridor. Coho spawning and rearing within the Russian River watershed is limited to south of the study area near West Soda Rock Lane (NMFS, personal communication), and includes the Dry Creek watershed and other downstream tributaries, as well as the Russian River Estuary. During project construction, a portion of the river channel would require isolating the river and control of water to install the erosion protection measures and bank stabilization improvements. Dewatering would involve water-filled bladder dams or gravel-filled bags and plastic sheeting, or equivalent, located upstream and downstream from the Project Area improvements. The Russian River flows would be routed around the dewatered area. Localized increases in turbidity during deployment and demobilization of the dewatering structure would be temporary and not occur during sensitive life stages. Dewatering, installation of dewatering structure and removal of aquatic vegetation during dewatering structure installation could potentially impact special-status fish present in the channel. Implementation of Mitigation Measure BIO-3 would reduce the potential impact to special status fish species to a less-than-significant level.

BATS

The western red bat (*Lasiurus blossevillii*) is considered a Species of Special Concern in California (CDFW 2023a). Western red bat roosts primarily in trees, tree hollows, and under loose bark and use open areas for foraging; it is moderately likely to occur in the study area. The medium to large trees in the riparian woodland within the study area provide suitable roost habitat for western red bat and other non-special-status bat species may forage over the low-flowing water or areas of annual grassland nearby. Bat species, including special-status bats and other bats protected under California Fish & Game Code, may roost in large trees, and may be injured or killed during vegetation removal. Such impacts that result in roost failure or mortality would be significant. **Mitigation Measure BIO-4** below would require pre-construction bat surveys with avoidance of active maternity roosts, and bat-safe tree removal procedures. Implementation of these measures would reduce impacts on roosting bats to a less-than-significant level.

Significance Level: Potentially Significant Unless Mitigated

Mitigation:

Mitigation Measure BIO-1: Protect Special Status Reptiles and Amphibians. The following measures shall be implemented during construction:

- *Environmental Awareness Briefings.* Prior to construction or related activities in areas where the California red-legged frog or other species of special concern (foothill-yellow legged frog, California giant salamander, red-bellied newt, and Western pond turtle) are likely to occur,

environmental staff shall brief contractors and other participants about its potential presence. The briefings shall include a flyer with photos and a description of the species and its habitat, the general provisions of applicable regulatory guidelines and the necessity to comply, and the measures that are being implemented to conserve the species as they relate to the activity.

- **Construction Restrictions.** Construction activities within riparian and aquatic areas (ephemeral and intermittent watercourses) shall be limited to the minimum area and duration required to meet the project design requirements.
- **Seasonal Restrictions.** Work within aquatic or riparian habitat shall be restricted to an in-stream work window, from June 15 through October 15, depending on rainfall, or, as determined by regulatory agency permits.
- **Biological Monitoring and Inspections.** When work is scheduled to occur in aquatic or riparian habitat that may provide habitat for foothill yellow-legged frog or western pond turtle, a qualified biologist shall inspect the work areas prior to the start of work in that area. The biologist shall visually inspect aquatic and riparian habitat, leaf litter, debris, vegetation, and small mammal or other burrows within the potential disturbance area. The qualified biologist shall be present at the work site until such time as the inspection of habitat, instruction of workers, and disturbance have been completed. The monitor shall have the authority to halt any action that might result in impacts to foothill yellow-legged frog or other special status species. In the event that a western pond turtle is observed within a work area, the USFWS Sacramento Field Office USFWS shall be immediately notified, and work will be halted within 100 feet of the individual until the frog has left on its own volition. In the event that a foothill yellow legged frog, California giant salamander, red-bellied newt are observed, they may be moved to a safe location in similar habitat outside of the construction zone.
- **Decontamination for Chytrid Fungus and Other Pathogens.** Any equipment (boots, nets, shovels) that has been used off site will be decontaminated prior to conducting activities in riparian or wetland habitat. Decontamination will comprise the equipment being scrubbed with a 75 percent ethanol solution or bleach solution (0.5-1.0 cup/gallon of water) and then rinsed with water. Decontamination will not occur within 100 feet of aquatic resources.

Mitigation Measure BIO-2: Protect Special Status, Migratory, and Nesting Birds. The following measures shall be implemented during construction:

- **Environmental Awareness Briefings.** Prior to construction or related activities in areas where nesting birds are likely to occur, environmental staff shall brief contractors and other participants about protective measures for nesting birds. The briefings shall include general provisions of applicable regulatory guidelines and the necessity to comply, and the measures that are being implemented to conserve the species as they relate to the activity.
- **Seasonal Restrictions.** Ground disturbance (i.e., grading, earthwork, drilling), tree removal, and vegetation clearing shall be conducted outside of the avian nesting season (the nesting season is typically March 1 – August 15 of any given year).
- **Pre-construction Surveys.** If ground disturbance, tree removals, or vegetation clearing cannot be confined to outside of the avian nesting season, a qualified biologist shall conduct pre-construction nesting bird surveys. Surveys shall include a full area search for nesting activity within the project area and a buffered distance of 50 feet. In addition, this should include frequent visual raptor scans with binoculars within the biological study area (the project boundary and a buffered distance of 500 feet), due to the potential for special status raptors to occur. If raptors are observed, the full area search may include searching for raptors in areas within the biological study area. If the entire area and buffer cannot be physically searched, it shall be visually and audibly assessed. The biologist shall conduct, at minimum, a one-day pre-construction survey within the seven-day period prior to tree/vegetation removal and ground-disturbing activities. If ground disturbance and tree/vegetation removal work lapses for seven days or longer during the nesting season, the qualified biologist shall conduct a supplemental avian pre-construction survey before project work is reinitiated.

- *No Construction Buffer Zones.* If active nests are detected, the qualified biologist shall flag a buffer around each nest. Construction activities shall avoid nest sites until the biologist determines that the young have fledged or nesting activity has ceased. If nests are documented outside of the project study boundary, but up to 500 feet of the area, buffers would be implemented as needed. The buffer size for common species would be determined on a case-by-case basis in consultation with CDFW. Buffer sizes would take into account factors such as (1) noise and human disturbance levels at the construction site; (2) distance and amount of vegetation or other screening between the construction site and the nest; and (3) sensitivity of individual nesting species. If special status bird species are presumed to be nesting, but no nest is detected, buffers may also be implemented.
- *Nest Monitoring.* The qualified biologist shall monitor all located nests at least once per week to determine nesting status and whether birds are being disturbed. If signs of disturbance or distress are observed, the qualified biologist shall immediately implement adaptive measures to reduce disturbance. These measures may include, but are not limited to, increasing buffer size, and/or halting disruptive construction activities in the vicinity of the nest until fledging is confirmed or nesting activity has ceased.

Mitigation Measure BIO-3: Protect Special Status Fish. The following measures shall be implemented during construction:

- *Environmental Awareness Briefings.* Prior to construction or related activities in aquatic habitat where special status fish, crustacean, and mollusk species may occur, environmental staff shall brief contractors and other participants about its potential presence. The briefings shall include a flyer with photos and a description of the species and its habitat, the general provisions of applicable regulatory guidelines and the necessity to comply, and the measures that are being implemented to conserve the species as they relate to the activity.
- *Seasonal Restrictions.* Work within the bed or bank of the Russian River shall be restricted to an in-stream work window, June 15 through October 15, depending on rainfall, or, as determined by regulatory agency permits. Construction within the bed or bank of any stream channel shall occur while streams are dry and no construction shall occur where flowing water is present. If a small amount of water persists within a stream bed during the in-water work window, work may be conducted only after the wetted portions of the stream have been investigated by a qualified biologist and it has been determined, by close inspection with nets or other appropriate methods, that special status species are not present and will not be affected by construction.
- *Stormwater and Erosion BMPs.* Stormwater, spill prevention, and general pollution prevention BMPs referenced in Mitigation Measure BIO-7 shall be implemented to reduce potential water quality degradation, dust, or erosion to areas adjacent to construction activities.

Mitigation Measure BIO-4: Protect Special Status Bats. The following measures shall be implemented during construction:

- *Seasonal Restrictions.* To the extent possible, removal of potential bat roosting habitat (i.e., tree cavities, loose bark, structures, etc.) shall be conducted during seasonal periods of bat activity (when bats are volant, i.e., able to leave roosts) between March 1 and April 15 or September 1 and October 15.
- *Apply Two-Step Removal for Bat Tree Roost Habitat.* A two-step process shall be applied for the removal of potential tree roost habitat during the bat volant period (i.e., when bats are active and able to leave their roosts). On day 1, limbs and branches shall be removed by a tree cutter using chainsaws. Limbs with cavities, crevices, or deep bark fissures shall be avoided. On day 2, the entire tree shall be removed.
- *Pre-construction Surveys.* If potential bat roosting habitat cannot be removed during the volant period and project activities must occur during the bat maternity season (April 16 through August 31), a qualified biologist shall conduct surveys for roosting bats within suitable habitat within seven days prior to removal. Survey methodology shall include visual

examination of potential roosting bat habitat and may utilize ultrasonic detectors or fecal collection for genetic testing to determine species.

- *Maternal Roost No Construction Buffer Zones.* If evidence of maternal bat roosts (i.e., accumulation of bat guano, ammonia odor, grease stained cavities) are detected within the construction area, an appropriate buffer distance shall be established in consultation with the CDFW to ensure that construction noise would remain below disturbance thresholds for special status bat species. Buffers may be removed when roosting activity has ceased and/or bats become volent.

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

Comment:

Construction and Operation

CDFW provides oversight of habitats (i.e., vegetation communities) listed as Sensitive in the California Natural Diversity Database (CNDDDB) and on the *California Sensitive Natural Communities List*, based on NatureServe Conservation global and state rarity rankings. The natural communities are broken down to alliance and association levels for vegetation types affiliated with ecological sections in California. The alliances on the *California Sensitive Natural Communities List* coincide with *A Manual of California Vegetation*. CDFW considers alliances and associations with a state rank of S1 to S3 to be Sensitive.

Riparian areas are defined as plant communities contiguous to and affected by surface and subsurface hydrologic features of perennial or intermittent water bodies (rivers, streams, lakes, or drainage ways). Riparian areas have one or both of the following characteristics: (1) distinctly different vegetative species than adjacent areas; (2) species similar to adjacent areas but exhibiting more vigorous or robust growth forms.

The Russian River is a Water of the U.S.; riparian forest is present along the bank of the river, containing primarily valley oak, coast live oak, white alder, red willow and bay laurel trees with an understory of poison oak and blackberry. A wetland forest consisting primarily of willows is also present alongside the river channel. The river and its adjoining habitats are regulated by the Army Corps of Engineers, who will require mitigation based on their "no-net-loss" policy. These habitats are also regulated as Waters of the State by the Regional Water Quality Control Board, with similar mitigation requirements. If riparian forest or willow forest is removed during construction, the loss would represent a significant impact. In addition, wetlands and waters in the project area may be indirectly impacted through sedimentation from dust and debris raised by construction equipment. Drainages, wetlands, and riparian vegetation can be harmed by such changes in water quality, which may alter important habitat for wildlife. These impacts are potentially significant but would be minimized by adherence to water quality measures and best management practices to reduce erosion and sediment delivery.

Mitigation Measure BIO-5 avoids and minimizes, where feasible, Project effects on sensitive natural communities and, where unavoidable, requires compensatory mitigation through enhancement and success monitoring or mitigation credit purchase. Mitigation Measure BIO-6 includes habitat restoration measures and adaptive management to ensure restoration goals are met. However, these measures would need to incorporate measures from regulatory agency permits to achieve restoration goals. The measure below requires preparing a habitat restoration and monitoring plan prior to restoration. Management goals would be defined (e.g., to manage invasive plant encroachment), and future management actions may include replanting, invasive species removal, fencing, irrigation, or enhanced erosion buffers.

Mitigation Measure BIO-5. Protection of Sensitive Natural Communities. The Project proponent shall require any impact to riparian and wetland vegetation or waters of the U.S/State be minimized where unavoidable by siting construction staging and access areas outside

sensitive natural communities and by utilizing previously disturbed upland areas for staging. Certified weed-free permanent and temporary erosion control measures (e.g., fabric wattles) shall be used to minimize erosion and sedimentation during and after construction. Temporary impacts on sensitive natural communities shall be restored by revegetation with native species. Revegetated sensitive natural areas shall be monitored for a five-year period to ensure success, according to the Habitat Restoration, Enhancement, and Monitoring Plan described in Mitigation Measure BIO-6.

Any permanently impacted riparian or wetland areas shall be mitigated in accordance with specifications of applicable regulatory agency permits; including compensatory mitigation, if required, with replacement of like habitat on- or off-site, at a minimum 1.1:1 ratio, or as otherwise specified by applicable resource agency permit(s).

During construction and restoration, to avoid the spread of invasive plant species and pathogens, the Project proponent shall ensure all vehicles and equipment entering the site shall be clean of invasive weeds. All construction equipment shall be washed thoroughly to remove all dirt, plant, and other foreign material prior to entering the Project site. Particular attention shall be given to the under-carriage and any surface where soil containing invasive weeds and exotic seeds may exist. Arrangements shall be made for inspections of each piece of equipment before entering the Project site to ensure all equipment has been properly washed. Equipment found operating that has not been properly washed shall be shut down and may be subject to citation:

- 1) Certified weed-free permanent and temporary erosion control measures shall be implemented to minimize erosion and sedimentation during and after construction.
- 2) The Project shall conform to applicable federal, state, and local seed and noxious (invasive) weed laws.
- 3) Nursery operations where plants are stored, propagated, or purchased must certify implementation of best management practices to reduce pest and pathogen contamination within their nursery.
- 4) Disturbed and de-compacted areas outside the restoration area shall be revegetated with locally native vegetation. Revegetated areas shall be protected and tended, including watering when needed, until restoration criteria specified by regulatory agency-issued permits is complete.
- 5) All tree removal and pruning activities shall include measures to avoid the spread of the Sudden Oak Death (SOD) pathogen. Such measures may include, but are not limited to the following:
 - i. As a precaution against spreading the pathogen, clean and disinfect pruning tools after use on confirmed or suspected infested trees or in known infested areas. Sanitize tools before pruning healthy trees or working in pathogen-free areas. Clean chippers and other vehicles of mud, dirt, leaves, organic material, and woody debris before leaving a site known to have SOD and before entering a site with susceptible hosts.
 - ii. Inform crews about the arboricultural implications of SOD and sanitation practices when they are working in infested areas.
 - iii. Provide crews with sanitation kits containing chlorine bleach, scrub brush, metal scraper, boot brush, and plastic gloves.
 - iv. Sanitize shoes, pruning gear, and other equipment before working in an area with susceptible species.
 - v. When possible, work on SOD-infected and susceptible species during the dry season (June–October). When working in wet conditions, keep equipment on paved, graveled, or dry surfaces and avoid mud. Work in disease-free areas before proceeding to infested areas.
 - vi. If possible, do not collect soil or plant material (wood, brush, leaves, and litter) from host trees in the quarantine area. Within the quarantine area, host material (e.g., wood, bark,

brush, chips, leaves, or firewood) from tree removals or pruning of symptomatic or non-symptomatic host plants should remain onsite to minimize pathogen spread.

- vii. Use all reasonable methods to sanitize personal gear and crew equipment before leaving a SOD infested site. Scrape, brush, and/or hose off accumulated soil and mud from clothing, gloves, boots, and shoes. Remove mud and plant debris by blowing out or power washing chipper trucks, chippers, bucket trucks, fertilization and soil aeration equipment, cranes, and other vehicles. Restrict the movement of soil and leaf litter under and around infected trees as spores may be found there.
- viii. Tools used in tree removal/pruning may become contaminated and should be disinfected with alcohol or chlorine bleach.

Mitigation Measure BIO-6. Habitat Restoration and Monitoring. Prior to construction, the County shall obtain all required environmental permits, including Clean Water Act Water Quality Certification (Section 401), Federal and state permits for wetlands (Section 404), and CDFW Lake and Streambed Alteration Agreement, and adhere to the conditions of each.

At least 30 days prior to the completion of project activities, the County shall submit a Restoration and Enhancement Plan (Plan) to CDFW for review and written approval. No project activities shall commence until the Plan is approved by CDFW in writing. The Plan shall detail compensation for permanent impacts to the Russian River and the surrounding riparian habitat in the form of restoration or enhancement of riparian habitat on-site, or off-site as close to the project site as possible, and within the same watershed. The plan shall also describe the onsite restoration of temporary impacts to riparian habitat associated with the Russian River. The Plan shall also include monitoring and success criteria. The Plan shall be implemented within the same calendar year as the completion of project activities unless otherwise approved in writing by CDFW. If planting occurs in a later year, a higher replacement ratio may be required by CDFW to offset the temporal loss of habitat. More than one plan may be necessary for restoration activities in different locations.

Restoration and monitoring shall be guided by a qualified biologist experienced in wetland habitat restoration. Restoration shall include protocols for replanting of native vegetation removed prior to or during construction, and management and monitoring of the plants to ensure replanting success. The following measures shall apply to site restoration:

- Areas impacted from construction-related activity shall be replanted or reseeded with locally collected and grown native shrubs and herbaceous species suitable for riparian locations, under guidance from a qualified restoration biologist.
- To ensure a successful revegetation effort as required by Measure 3.1, all plants shall be monitored and maintained as necessary for five years. At the end of the five years of monitoring, with at least three years without supplemental irrigation, each category of plantings (e.g., oaks, other trees, shrubs, etc.) shall have a minimum of 85% survival at the end of the minimum monitoring period and plantings shall attain 70% cover after 3 years and 75% cover after 5 years, unless approved in writing by CDFW. Survival and cover criteria shall both be required unless the herbaceous or spreading plants cannot be differentiated by individual, in which case only cover success criteria are required.
- The plan shall describe compensation for the removal of trees at the below minimum replacement to impact ratios:
 - 1:1 for removal of non-native trees
 - 1:1 for removal of native trees up to 3 inches DBH
 - 3:1 for removal of native trees greater than 3 inches to 6 inches DBH
 - 6:1 for removal of native trees greater than 6 inches DBH
 - 1:1 for removal of oak trees up to 3 inches DBH

- 4:1 for removal of oak trees up to 6 inches DBH
- 8:1 for removal of oak trees greater than 6 inches to 15 inches DBH
- 10:1 for removal of oak trees greater than 15 inches DBH

Replacement tree plantings shall consist of 5-gallon or greater saplings and locally collected seeds, stakes, or other suitable nursery stock as appropriate, and shall be native species to the area adapted to the lighting, soil, and hydrological conditions at the replanting site. If acorns are used for oak tree replanting, each planting will include a minimum of three acorns planted at an approximately two inch depth to minimize predation risk. Large acorns shall be selected for plantings. Replacement oaks shall come from nursery stock grown from locally-sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they are planted.

Significance Level: Potentially Significant Unless Mitigated

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

Comment:

Construction and Operation

An aquatic resources delineation was conducted for the proposed project on May 2, 2023, and again by August 1, 2023, and January 12, 2024. (ESA 2024 (Appendix B)). Wetlands and other waters of the U.S. were mapped based on wetland vegetation, hydric soils, wetland hydrology, presence of defined channels, and ordinary high water mark. The aquatic resources delineation identified approximately 9.416 acres of aquatic resources in the study area please see **Table BIO-1** for details:

**Table BIO-1
Aquatic Resources Summary**

Aquatic Feature	Cowardin Classification	Acres	Square Feet	Linear Feet
Wetlands				
Forested Wetland 1	Palustrine, Forested, Broad-leaved Deciduous, Temporarily Flooded (PFO1A)	0.296	12,894	—
Forested Wetland 2	PFO1A	0.644	28,053	—
Forested Wetland 3	PFO1A	5.197	226,381	—
<i>Subtotal Wetlands</i>		<i>6.137</i>	<i>267,328</i>	<i>—</i>
Other Waters				
Russian River	Riverine, Lower Perennial, Unconsolidated Bottom, Permanently Flooded (R2UBH)	3.094	134,775	1,665
Intermittent Channel	Riverine, Intermittent, Streambed, Seasonally Flooded (R4SBC)	0.104	4,530	215
Ephemeral Channel 1	Riverine, Ephemeral (R6)	0.073	3,180	919
Ephemeral Channel 2	R6	0.004	174	61
Ephemeral Channel 3	R6	0.003	131	54
<i>Subtotal Other Waters</i>		<i>3.278</i>	<i>142,790</i>	<i>2,914</i>
Total Aquatic Resources		9.416	410,117	2,914

SOURCES: FGDC 2013; data compiled by Environmental Science Associates in 2023.

NOTE: Totals may not sum due to rounding.

The proposed project would require construction activities that may affect about 9.5 acres of riparian habitat and will require notification requirements under Clean Water Act 404 Individual Permit, 401 Water Quality Certification and CFGC Section 1602 and would require a Lake or Streambed Alteration Agreement from CDFW.

These aquatic resources would potentially be affected by the proposed project due to filling, erosion, sedimentation. The impact would be potentially significant. Mitigation Measure BIO-7 would reduce the impact to a less-than-significant level.

Significance Level: Potentially Significant Unless Mitigated

Mitigation:

Mitigation Measure BIO-7: Best Management Practices to Protect Aquatic Resources. Prior to the start of construction activity within jurisdictional features, required permits from the United States Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife shall be obtained. Conditions of approval outlined in the permits shall be implemented during construction, and the County shall ensure that the project does not result in a net loss of wetlands.

The following measures shall be implemented:

- *Seasonal Restrictions.* Work within the bed or bank of any stream channel shall be restricted to an in-stream work window of June 15 through October 15, or as determined through regulatory agency permits. Construction within the bed or bank of any stream channel or watercourse shall occur while streams are dry and no construction shall occur where flowing water is present.
- *Stormwater and Erosion BMPs.* Stormwater and general pollution prevention BMPs shall be implemented to reduce potential water quality degradation to areas adjacent to construction activities. Suitable erosion and sediment control BMPs, such as silt fences, fiber rolls, and/or earthen berms shall be installed or constructed between work zones and/or staging and stockpile areas and any stream channel to intercept potential sediment and runoff to receiving waters during rain events. These structures shall be installed pursuant to regulatory specifications prior to pending rain events greater than 50 percent possibility of rain within 24 hours, as forecasted by the National Weather Service. Any sediment caught by erosion and sediment control BMPs shall be removed and disposed of prior to BMP removal. Temporary spoils or construction material sites shall be located so as to not drain directly into ditches, streams, or other waterbodies. If a spoils/construction materials site has potential to drain into a surface water feature, a retention basin, berm(s), or other catchment device shall be constructed or installed to intercept runoff before it reaches any waterbody. All exposed mineral soil, or stockpiles to remain on-site through the wet season shall be winterized and protected from erosion associated with wind and rain (e.g., silt fences, straw bales, straw mulch, and tarps).
- *Stormwater Pollution Prevention Plan (SWPPP).* The County or its contractor shall obtain coverage under the SWRCB National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit; Order No. 2009-009- DWQ as amended by 2010-2014-DWQ). The County and its contractor shall prepare and implement a project-specific Storm Water Pollution Prevention Plan (SWPPP) that manages pollutant sources, identifies erosion and sediment control measures and water quality protection measures, and prescribes best management practices to protect water quality pre- and post-construction. The SWPPP would address pollutant sources, best management practices, and other requirements specified in the Order. A Qualified SWPPP Practitioner would oversee implementation of the SWPPP.
- *Spill Prevention and Containment.* Equipment shall be staged, and materials shall be stockpiled, outside of stream channels (above top of bank of the Russian River), wetlands,

and riparian habitat. Equipment shall be cleaned of deleterious materials before being delivered to the job site. Refueling will occur at least 100 feet away from any identified aquatic resource or riparian habitat. Gas cans will only be stored in identified staging areas and will utilize secondary containment features. Any construction equipment operating adjacent to or over a stream shall be inspected daily for leaks. No equipment will be left overnight below the top of bank of the Russian River. Any oil, fuel, and grease residue that has the potential to fall from machinery shall be removed and properly disposed of. Fueling trucks shall be equipped with sealed spill kits at all times.

- *Revegetation of Disturbed Areas.* Areas disturbed by construction and temporary storage sites shall be reseeded and mulched with a suitable erosion control seed mixture post-construction upon completion of construction. Seeds shall be comprised of California native and regionally appropriate species. No fertilizers shall be used in any seed mixes, and no straw shall be applied below top of bank of the Russian River.
- *Design Features.* If feasible, natural bottom culverts shall be incorporated into the design when culvert replacement is required to maximize beneficial habitat. Banks shall be regraded to match existing topography.

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

Comment:

Construction and Operation

The Russian River and its banks with associated riparian and wetland vegetation provide a critical corridor for wildlife species. The Russian River itself is critical habitat for steelhead, Chinook Salmon, and Coho Salmon; however, Coho Salmon critical habitat is not present within the project area. The in-stream wetlands and riparian uplands along the banks provide movement corridors for amphibians, reptiles, small mammals, and numerous birds, which use the cover and forage, including insects and aquatic invertebrates, provided by the Russian River ecosystem. It is listed as “potential riparian connection” in the California Essential Habitat Connectivity database (CDFW 2023c). Outside of the riparian zone, the riverside is developed with roads, residences and vineyards and does not provide cover or forage for wildlife movement.

While Project construction would temporarily impede the use of a small portion of the Russian River and removal a small degree of riparian habitat displacing wildlife, the impact would be of short duration, and wildlife movement would resume following construction. Thus, impacts on wildlife movement would be less than significant, with no mitigation required.

Following construction, the proposed project would maintain accessible aquatic habitat, riparian connectivity, and wildlife migratory corridors in the project area. Therefore, the operational impact would be less than significant.

Significance Level: Less than Significant

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

The following discussion summarizes the County’s primary environmental regulations that serve to protect sensitive biological resources relevant to the CEQA review process.

Sonoma County General Plan. The *Sonoma County General Plan 2020* (Sonoma County 2008) Land Use Element and Open Space & Resource Conservation Element both contain policies to protect natural resource lands including, but not limited to watershed, fish and wildlife habitat, biotic areas, and habitat connectivity corridors. Policy OSRC-8b establishes streamside conservation areas along designated riparian corridors. Policy OSRC-3h directs the County to design public works projects to

minimize tree damage and removal along Scenic Corridors and to design replanting programs so as to accommodate ultimate planned highway improvements, including revegetation following grading and road cuts.

Comment:

Construction and Operation

If not properly mitigated, the project's construction-related impacts may potentially conflict with applicable County goals and policies protecting biological resources. The potential impact is considered significant. However, with implementation of Mitigation Measures BIO-1 through BIO-7, the impact would be reduced to a less-than-significant level.

Following construction, operation of the proposed project would not require ground disturbance or other activities that would conflict with policies or ordinances protecting biological resources. Therefore, no operational impact would result.

Significance Level: Less than Significant with Mitigation Incorporated

Mitigation:

Implement Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, and BIO-7.

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

Comment:

Construction and Operation

No adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other habitat conservation plans cover the proposed project area. No impact would result.

Significance Level: No Impact

5. CULTURAL RESOURCES:

Would the project:

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

Comments:

Construction and Operation

The CEQA Guidelines define a historical resource as: (1) a resource listed in the California Register of Historical Resources; (2) a resource included in a local register of historical resources, as defined in the California Public Resources Code (PRC) Section 5020.1(k), or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (3) any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

An archival and records search of the California Historical Resources Information Center (CHRIS) was conducted at the Northwest Information Center (NWIC), which is administered by the State of California Office of Historic Preservation (OHP) as the official state repository for records and reports on historical resources. The records search examined:

- NWIC maps (USGS 7.5-minute topographic maps with NWIC annotations), to identify recorded archaeological sites, recorded archaeological surveys, and recorded historic-era resources of the built environment (buildings, structures, and objects).
- Site records and study reports on file at the NWIC corresponding to those marked on the NWIC maps.
- The California Department of Parks and Recreation's California Inventory of Historic Resources and the OHP's Historic Properties Directory and Built Environment Resource Directory to identify California Historical Landmarks, California Points of Historic Interest, and California historic properties that are listed in, or determined eligible for listing in, the National Register of Historic Places or the California Register of Historical Resources.
- Historic-era maps (General Land Office maps, and 19th- and early-20th-century USGS 15- and 7.5-minute topographic maps), to identify additional historic-era buildings, structures, objects, and areas of archaeological sensitivity.
- Online resources including historical map collections, the United States Department of Agriculture Web Soil Survey website, United States Geological Survey online map and geological information, websites of local historical museums and societies, Tribal websites, and subject-specific search results.

The records search identified no cultural resources within the area of potential effect or within a 0.25-mile buffer of the project area.

The proposed project is anticipated to require three permanent easements and two temporary construction easements from properties adjacent to River Road. Permanent and temporary construction easements would be limited to areas immediately adjacent to River Road. No properties along River Road in the project area are listed in the National Register of Historic Places or the California Register of Historical Resources.

Based on the review, the proposed project would not result in a substantial adverse change in the significance of a historical resource. The impact would be less than significant. The potential for historic-period archaeological resources is evaluated in impact "b" below.

Significance Level: Less than Significant

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

Comment:

Construction and Operation

An Archaeological Resources Survey was prepared for the proposed project (ESA 2023 [Appendix D]), which evaluated the potential for surficial and/or buried archaeological and historical resources in the project area. The study included four main parts:

- Records and literature search at the NWIC.
- Literature review of publications, files, and maps at ASC and online for ethnographic, historic-era, and prehistoric resources and background information.
- Communication with the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File and contact information for the appropriate Tribal communities, who were then contacted regarding the project.
- Pedestrian archaeological survey of the project area.

The study area comprised an Area of Potential Effect (APE), which was deemed sufficient to capture any recorded resources likely to be affected by the project, to provide contextual background, and to indicate the potential for unknown resources. The records search found no previously recorded cultural resources in the project area, and the pedestrian archaeological survey did not identify archaeological resources. The project area was determined to have low sensitivity for buried pre-contact and historic-era archaeological resources, as well as for unrecognized surficial archaeological resources for pre-contact and historic-era archaeological resources.

Construction of the project involves ground-disturbing activities including excavation and fill along the Russian River and adjacent vineyard. Although the Archaeological Resources Survey found no recorded archaeological sites in the project area, as mentioned, the proposed project includes excavation, and previously unrecorded surficial or subsurface archaeological resources may potentially be uncovered during construction. Pre-contact and historic-era resources may be obscured by colluvium, alluvium, vegetation, or other factors. If a previously unrecorded archaeological resource is identified during ground-disturbing construction activities and is found to qualify as an historical resource, as per CEQA Guidelines § 15064.5, or a unique archaeological resource, as defined in PRC § 21083.2(g), any impacts to the resource resulting from the project could be potentially significant. Implementation of Mitigation Measure CR-1 would reduce the potential impact to a less-than-significant level by outlining procedures to be taken in the event of inadvertent discovery of unrecorded resources consistent with appropriate laws and requirements.

Significance Level: Potentially Significant Unless Mitigated

Mitigation:

Mitigation Measure CR-1: Protect Archaeological Resources and Tribal Cultural Resources if Encountered during Construction. To limit potential impacts on archaeological resources, the project specifications shall require the contractor to comply with the following measures regarding the discovery of cultural resources, including Native American Tribal Cultural Resources and items of historical and archaeological interest:

- The County's Construction Inspector and construction personnel shall be notified of the possibility of encountering cultural resources during project construction prior to the start of ground-disturbing activities.
- The County shall notify the Tribal Historic Preservation Officers (THPOs) of the appropriate Native American Tribes in writing at least five days prior to the start of the project's ground-disturbing activities that work will commence.

- Prior to initiation of ground-disturbing activities, the County shall arrange for construction personnel to receive training about the kinds of cultural materials that could be present at the project site and protocols to be followed should any such materials be uncovered during construction. An archaeologist who meets the U.S. Secretary of Interior's professional standards (48 CFR Parts 44738-44739 and Appendix A to 36 CFR 61) shall provide the appropriate archaeological training, including the purpose of the training to increase awareness and appropriate protocols in the event of an inadvertent discovery.
- The project specifications will provide that if discovery is made of items of historical, archaeological, or cultural interest, the contractor will immediately cease all work activities in the area of discovery. Historical, archaeological, and cultural indicators may include, but are not limited to, dwelling sites, locally darkened soils, stone implements or other artifacts, fragments of glass or ceramics, animal bones, and human bones. After cessation of ground-disturbing activities, the contractor will immediately contact the County's Construction Inspector and the THPOs. The contractor will not resume work until authorization is received from the Construction Inspector.
- Should an archaeological deposit be encountered during ground disturbance in the project area, all ground-disturbing activities within 25 feet shall be stopped. The County Construction Inspector shall notify a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology contacted to assess the situation and make recommendations for the treatment of the discovery. If the deposit is found to be significant (i.e., eligible for listing in the NRHP) and an adverse effect would occur, the County in consultation with the SHPO and THPOs, shall identify appropriate treatments for the discovery.

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

Comment:

Construction and Operation

No information has been identified suggesting the presence of human remains within the project area. Although human remains are not anticipated to be encountered, the potential still exists. If such resources were encountered, a potentially significant impact could result. Implementation of Mitigation Measure CR-2 would reduce the potential impact to previously undiscovered human remains to a less-than-significant level by outlining procedures to be taken in the event of inadvertent discovery consistent with appropriate laws and requirements.

Following construction, no earthwork would occur. No operational impact would result.

Significance Level: Potentially Significant Unless Mitigated

Mitigation:

Mitigation Measure CR-2: Protect Human Remains if Encountered during Construction. To limit potential impacts on human remains, the County shall implement the following measures:

- In the event that human remains are identified during project construction, these remains must be treated in accordance with Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the Public Resources Code, as appropriate.
- Section 7050.5 of the California Health and Safety Code states that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will

- identify a Native American Most Likely Descendent (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.
- Section 5097.98 of the Public Resources Code states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify those persons (i.e., the MLD) it believes to be descended from the deceased. With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

6. ENERGY:

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

Comment:

Construction

Temporary energy use in connection with project construction would include consumption of diesel fuel and gasoline by construction equipment and transport of materials, supplies, and construction personnel to and from the project site. Project construction activity would not require a large amount of fuel or energy usage because of the limited extent and nature of the proposed improvements and the minimal number of construction vehicles that would be required for a project of this scale. Impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure. The construction-related impact would be less than significant.

Operation

No operational impact would result as after the five years of maintenance and monitoring of the revegetation, no activities are expected at the site.

Significance Level: Less than Significant

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

Comment:

Construction and Operation

The project would not conflict with or obstruct implementation of a state plan for energy efficiency, such as the State Energy Action Plan or the State Alternative Fuels Plan that have been adopted by the California Energy Commission and the California Public Utilities Commission. Project construction activities would not require a large amount of fuel or energy usage because of the limited extent and nature of the proposed improvements. No conflict with strategies for renewable energy or energy efficiency would result. No impact would result.

Significance Level: No Impact

7. GEOLOGY AND SOILS:

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

Would the project:

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

Comment:

Construction and Operation

The proposed project is not located within a designated Alquist-Priolo Earthquake Fault Zone, and no other active or potentially active faults have been mapped passing through the project area. The nearest active fault is the Maacama Fault Zone located two miles northeast from the project site. The project would not expose people or structures to potential substantial adverse effects, including risk of loss, injury, or death, involving rupture of a known earthquake fault. No impact would result.

Significance Level: No Impact

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

Comment:

Construction and Operation

The proposed project is located in a region that would be subject to strong seismic ground shaking resulting from potential earthquakes along the Healdsburg Fault, Maacama Fault, San Andreas Fault, and other active regional faults. The nearest active fault is the Maacama Fault Zone located two miles northeast from the project site. Design and construction of the project is subject to engineering standards of Caltrans, the California Building Code and local and state standards that consider soil properties and seismic ground shaking. By applying required geotechnical evaluation techniques and appropriate engineering practices, potential injury and damage from seismic activity would be diminished, thereby exposing fewer people and less property to the effects of a major damaging earthquake. The impact would be less than significant.

Significance Level: Less than Significant

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

Comment:

Construction and Operation

According to the Sonoma County Hazard Mitigation Plan Major Earthquake Fault Zones & Areas of Liquefaction Map (Permit Sonoma 2001) that is adopted from California Geological Survey mapping, the proposed project is located in "moderate" liquefaction susceptibility areas. The design and construction of the project would be subject to engineering standards of Caltrans, the California Building Code and local and state standards and specifications that consider soil properties, including liquefaction. By applying required geotechnical evaluation techniques and appropriate engineering practices during design and construction, potential injury and damage from seismically-induced liquefaction and ground failure would be reduced. The impact would be less than significant.

Significance Level: Less than Significant

iv. Landslides?

Comment:

Construction and Operation

According to USGS mapping, the proposed project is located primarily in areas designated as “flat land” with isolated areas designated as “few landslides.” No steep hillsides or geologic structures known to be at risk of landslide have been identified adjacent to the project corridor. Therefore, the potential impact from landslides is considered less than significant.

Significance Level: Less than Significant

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

Comment:

Construction and Operation

Soils in the project area *have a low to high erosion potential*; however, the project would be designed to meet current standards, is an erosion reduction and bank stability project, and would include erosion control BMPs to reduce the potential for erosion. Areas along the Russian River the within project corridor that would be disturbed during construction consist predominantly of alluvial deposits, rock, and previously disturbed and underlying soils highly altered from their original natural state. As a result, the project would result in little disturbance to native topsoil.

Grading and earthwork activities during construction would expose soils to potential short-term erosion by wind and water. However, erosion and sediment control provisions of the County Construction Grading and Drainage Ordinance (Zoning Code Chapter 11) and Storm Water Quality Ordinance (Zoning Code Chapter 11A) require implementation of best management practices to reduce runoff and erosion. In addition, because the project would disturb more than one acre, a Storm Water Pollution Prevention Plan (SWPPP) would be developed in accordance with the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities. The SWPPP would identify best management practices to be implemented to prevent soil erosion during construction and to stabilize the site at the end of construction. Additionally, stormwater, spill prevention, and general pollution prevention BMPs referenced in Mitigation Measure BIO-7 would be implemented to reduce erosion to areas adjacent to construction activities. These requirements would ensure that potential project impacts on soil erosion would be less than significant.

Significance Level: 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?

Comment:

Construction and Operation

The design and construction of the project would be subject to engineering standards of Caltrans, the California Building Code and local and state standards that consider soil properties. By applying required geotechnical evaluation techniques and appropriate engineering practices, potential impacts from unstable soils would be diminished. The impact would be less than significant.

Significance Level: Less than Significant

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

Comment:

Construction and Operation

Soils in the project area have a low to moderate potential to shrink and swell; however, the project would not include the construction of any new property development and result in substantial direct or indirect risks to life or property. The impact would be less than significant.

Significance Level: 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?**

Comment:

Construction and Operation

The proposed project does not involve installation or use of septic tanks or alternative wastewater disposal systems. No impact would result.

Significance Level: No Impact

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

Comment:

Construction and Operation

Construction of the project involves ground-disturbing activities including excavation and fill. Paleontological resources are generally found in geologic deposits of sedimentary rock (e.g., sandstone, siltstone, mudstone, claystone, or shale) that are typically buried under surficial soil deposits. The project area has a high sensitivity for paleontological resources; therefore, construction activities could potential impact unique paleontological resources. Implementation of Mitigation Measure GEO-1 below would reduce the potential impact to undiscovered paleontological resources to a less-than-significant level by addressing discovery of unanticipated buried resources and preserving and/or recording those resources consistent with appropriate laws and requirements.

Following construction, no earthwork would occur. No operational impact would result.

Significance Level: Potentially Significant Unless Mitigated

Mitigation:

Mitigation Measure GEO-1: Protect Paleontological Resources if Encountered during Construction. If fossils are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), construction activities shall be diverted away from the discovery within 50 feet of the find, and a professional paleontologist shall be notified to document the discovery as needed, to evaluate the potential resource, and to assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the material, if it is determined that the find cannot be avoided. The paleontologist shall make recommendations for necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permanent scientific institution where they would be properly curated and preserved.

8. GREENHOUSE GAS EMISSIONS:

Would the project:

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

Comment:

Climate change is not caused by any individual emission source but by a large number of sources around the world emitting greenhouse gases (GHGs) that collectively create a significant cumulative impact. The principal GHGs contributing to global climate change are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated compounds. These gases allow visible and ultraviolet light from the sun to pass through the atmosphere, but they prevent heat from escaping back into space.

Emissions from the construction of the Project would be generated primarily from heavy equipment, such as excavators and graders, and haul truck trips. Emissions would be temporary and short-term, with construction lasting approximately 7 months. Estimated emissions during the construction year were found to be approximately 231 metric tons of carbon dioxide equivalents (MT CO₂e) (Appendix A).

Best management practices (BMPs) are applied to projects of the County during the construction phase to reduce GHG emissions. These construction phase BMPs include:

- A. Minimize idling times either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes;
- B. Maintain and properly tune equipment in accordance with the manufacturer's specifications;
- C. Recycle demolition materials to the extent feasible; and
- D. Use alternative fueled (e.g., biodiesel, electric) construction vehicles/equipment to the extent feasible.

The temporary impact from construction-related GHG emissions would be less than significant.

Once completed, the Project would require minimal maintenance activities such as inspections, monitoring or revegetation on the bank. These activities would only be required on an intermittent basis and may result in a minor increase in motor vehicle trips with negligible emissions from workers travelling to and from the Project site.

For these reasons, GHG emissions from the proposed project are not considered cumulatively considerable, and the impact would be less than significant.

Significance Level: Less than Significant

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

Comment:

The applicable plans adopted for the purpose of reducing GHG emissions are the CARB 2022 Scoping Plan Update and AB 32. There are no local climate action plans (CAP) that would apply to the proposed project. The 2022 Scoping Plan Update contains one measure focused on emissions from construction and requires that 25 percent of energy demand from all construction equipment be electrified by 2030 and 75 percent by 2045. However, construction of the Project would be complete before 2030 and therefore would align with the state-level targets. Additionally, the NSCAPCD does not have any current adopted targets or goals that address construction emissions. Any electrical power required during construction will be supplied from Pacific Gas & Electric, which is required to comply with SB 100 and the Renewable Portfolio Standards (RPS). SB 100 requires that the

proportion of electricity from renewable sources be 60 percent by 2030 and 100 percent renewable power by 2045.

Once completed, the Project would require minimal maintenance activities such as inspections, monitoring or revegetation on the bank. These activities would only be required on an intermittent basis and may result in a minor increase in motor vehicle trips with negligible emissions from workers travelling to and from the Project site.

The Project would be consistent with all applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions and would therefore impacts would be less than significant.

Significance Level: Less than Significant

9. 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?**

Comment:

Construction

Construction activities would involve the use of fuels, lubricants, paints, and other similar materials. Such materials are commonly used during construction, are not acutely hazardous, and would be used in small quantities. During construction, hazardous materials used, stored, or transported would be required to follow standard safety protocols (as determined by the U.S. EPA, California Department of Health and Safety, and Sonoma County). Soil management and disposal procedures would be implemented in accordance with applicable local, state and federal regulations. As discussed in Impact (d) below, the potential for construction activities to encounter residual soil or groundwater contamination associated with a hazardous materials clean-up site is considered low. The construction-related impact would be less than significant.

Significance Level: Less than Significant

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

Comment:

The proposed project would not involve any materials or conditions that would result in risk of upset or accident that would release hazardous materials into the environment. Examples of project types that may involve such risk could include refineries, fuel storage, or tanker transportation, where accidents could result in catastrophic environmental or human consequences. The proposed project would not involve such risk or circumstances.

Proper use of materials in accordance with local, state, and federal requirements, and as required in the construction documents, would minimize the potential for accidental releases or emissions from hazardous materials during construction. Caltrans and the California Highway Patrol regulate the transportation of hazardous materials and wastes, including container types and packaging requirements, as well as licensing and training for truck operators, chemical handlers, and hazardous waste haulers. The California Division of Occupational Safety and Health (Cal-OSHA) enforces hazard communication program regulations which contain worker safety training and hazard information requirements, such as procedures for identifying and labeling hazardous substances, communicating hazard information related to hazardous substances and their handling, and preparation of health and safety plans to protect workers and employees. Because contractors would be required to comply with existing and future hazardous materials laws and regulations addressing the transport, storage, use, and disposal of hazardous materials, the potential to create a significant hazard from accidental conditions during construction would be less than significant.

Operation of the proposed project would not result in the use of hazardous materials. Long-term operation and maintenance of River Road and the storm drain system would be performed by existing County staff as part of ongoing routine maintenance. No long-term operational impact would result.

Significance Level: 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?

Comment:

There are no schools located or proposed within a mile of the project area. Therefore, the project would not be expected to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.

Construction would include the use of fuels, lubricants, degreasers, paints, solvents and similar materials, all of which are common to construction, are not acutely hazardous, and would be used in small quantities. Numerous laws regulate transportation, use, storage, and disposal of hazardous materials (see Impact a & b above). Although construction activities could result in the inadvertent release of small quantities of construction chemicals, there are no schools within one-quarter mile of the proposed project. In any case, a spill or release within the proposed project area is not expected to endanger individuals at a nearby school given the nature of the materials and the small quantities that would be used. Contractors would be required to comply with existing and future hazardous materials laws and regulations covering the transport, use, and disposal of hazardous materials, and based on the nature and quantity of the hazardous materials to be potentially used by the project, the impact related to the use of hazardous materials during construction within one-quarter mile of a school would be less than significant.

Significance Level: Less than Significant.

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

Comment:

Construction and Operation

The provisions in Government Code Section 65962.5 are commonly referred to as the "Cortese List." A search of the Cortese List was completed to determine if any known hazardous waste sites have been recorded on or adjacent to the project corridor. These include:

- Department of Toxic Substances Control EnviroStor database;
- List of Leaking Underground Storage Tank Sites from the Water Board GeoTracker database;
- List of solid waste disposal sites identified by the Water Board with waste constituents above hazardous waste levels;
- List of "active" Cease and Desist Orders and Cleanup and Abatement Orders from the Water Board; and
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.

The review of these databases indicates that there are no active sites within or adjacent to the project area. Therefore, the project would not create a significant hazard to the public or the environment related to hazardous materials.

Significance Level: No Impact

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

Comment:

Construction and Operation

The proposed project is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport is Healdsburg Municipal Airport, located approximately four miles south of the proposed project. No impact would result.

Significance Level: No Impact

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

Comment:

Construction

River Road is a primary emergency evacuation route for adjacent land uses in the project vicinity. During construction, the normal functionality of River Road would be temporarily delayed by construction equipment and traffic to accommodate construction activities, which could have a potentially significant impact on emergency evacuation. Implementation of Mitigation Measure HAZ-1 would ensure adequate traffic access for the public and emergency responders during construction and during a potential evacuation scenario, reducing the impact to less than significant. After construction of the proposed project, River Road would be restored and fully functional as an evacuation route.

Operation

Operation and maintenance activities associated with the proposed project would not impair or interfere with the County's emergency response plan or established evacuation travel routes. No operational impact would result.

Significance Level: Potentially Significant Unless Mitigated

Mitigation:

Mitigation Measure HAZ-1: Minimize Emergency Evacuation Impacts during Construction.

During construction, the County and its contractor shall implement traffic controls to ensure River Road remains a viable emergency evacuation route, including:

- During construction, at least one lane in each direction of River Road shall be kept open at all times. Through traffic shall be maintained through temporary signals, flaggers or other means.
- Construction shall be coordinated with emergency service providers and administrators of land uses that may be more affected by traffic impacts, such as fire stations, schools, hospitals, and ambulance providers. As construction progresses, emergency providers, and other land uses as mentioned above, shall be notified in advance of construction of the timing, location, and duration of construction activities and the locations and durations of any temporary detours and/or lane closures.
- The contractor shall be required to have ready the means necessary to accommodate access by emergency vehicles, such as plating over any excavations, flaggers or other means. This includes opening the road to two-way traffic in the event of an emergency evacuation in the area.

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

Comment:

River Road in Geyserville is situated with the State Responsibility Area. According to CAL FIRE'S Fire Hazard Severity Zone mapping, the State Responsibility Areas contiguous to River Road have been designated as a moderate to high fire hazard severity zone.

Construction

If construction activity occurs during the dry season, it is possible that accidental fire ignition could occur related to use of heavy machinery and other construction vehicles. Because vegetation along the project corridor could be dry during construction, and because of the close proximity of nearby residences and other land uses, the construction-related impact is considered potentially significant. Implementation of Mitigation Measure HAZ-2 would require the use of construction techniques that would reduce the likelihood of wildland fires during construction to less than significant.

Operation

Following construction, disturbed areas would be restored and the proposed project would not increase the risk of wildland fires. No operational impact would result.

Significance Level: Potentially Significant Unless Mitigated

Mitigation:

Mitigation Measure HAZ-2: Reduce Wildland Fire Hazards. At the start of construction, the County and its contractor shall remove or clear away dry, combustible vegetation from within the area of direct impact. Grass and other vegetation less than 18 inches in height above the ground shall be maintained in the construction area where necessary to stabilize the soil and prevent erosion. Vehicles shall not be parked in areas where exhaust systems contact combustible materials. Fire extinguishers shall be available to assist in quickly extinguishing any small fires, and contractors shall have on site the direct phone number for the local fire departments.

10. HYDROLOGY AND WATER QUALITY:

Would the project:

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

Comment:

Construction and Operation

Construction materials, dust, and debris could result in temporary impacts on water quality if they were to enter the adjacent waterways and if surface water were to be present. Construction of the project is planned to occur during the spring, summer, and fall construction season, during that portion of the year outside of the rainy season when surface water within the Russian River is at its seasonal minimum. The project would be constructed in compliance with applicable water quality and dust control regulations.

The temporary river diversion system would divert the river away from the work area. If flows are higher than normal during the summer construction season, it is possible that more extensive channelization would be required. This can be accomplished in several ways depending on the flow to be channeled, including, in order of increasing flow capacity:

- Construction of clean gravel berms covered with plastic sheeting.
- Stacked K-rail with plastic sheeting
- Inflatable cofferdams

Implementation of Mitigation Measure Hydrology-1 would reduce the impact to less than significant.

Mitigation:

Mitigation Measure Hydrology-1. During construction, the County and its contractor shall implement the following:

- Equipment staging and storage areas for vehicles, equipment, material, fuels, lubricants, and solvents would be restricted to designated areas and would be a minimum of 25 feet from jurisdictional features and outside of the drip-line of adjacent native vegetation communities.
- Prior to construction, high visibility ESA protective fencing or flagging would be installed at the limits of construction to protect existing vegetation to remain, which is outside of clearing and grubbing limits, from the contractor's operations, equipment, and materials storage. ESA protection areas would be identified on the project plans to limit contractor work areas in consultation with Permit Sonoma PRMD staff.
- BMPs, such as silt fencing, fiber rolls, straw bales, or other measures would be implemented during construction to minimize dust, dirt, and construction debris from entering into jurisdictional resources and native vegetation communities, and/or leaving the construction area. No erosion control materials containing plastic monofilament netting (erosion control matting) or similar material containing netting within the project area would be used due to documented evidence of wildlife species becoming entangled or trapped in such material. Acceptable substitutes include coconut coir matting or similar.
- Appropriate hazardous material BMPs would be implemented to reduce the potential for chemical spills or contaminant releases into the jurisdictional features and native vegetation communities, including any non-stormwater discharge. Any hazardous or toxic materials that could be washed into jurisdictional features and be deleterious to aquatic life would be contained in watertight containers or removed from the construction site. In addition, spill kits would be kept on site and field personnel would be trained on how to use them appropriately.

- All equipment refueling, and maintenance would be conducted in the staging area away from jurisdictional features, outside of the top of bank of the Russian River, and outside of the drip-line of adjacent native vegetation communities. In addition, vehicles and equipment would be checked daily for fluid and fuel leaks, and drip pans would be placed under all equipment that is parked and not in operation. Any leaking vehicle or equipment would not be operated in the project area until repaired. All workers would be informed of the importance of preventing spills and the appropriate measures to take should a spill happen.
- Stationary equipment such as motors, pumps, generators, compressors, and welders located within 50 feet of the jurisdictional resources and native vegetation communities would be positioned over drip-pans, including when in operation.

Significance Level: Potentially Significant Unless Mitigated

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

Comment:

Construction and Operation

The proposed project would not prevent precipitation from infiltrating into the groundwater, nor would it result in direct additions or withdrawals of existing groundwater. Temporary surface and groundwater dewatering during construction is not anticipated, but if necessary, would involve the pumping of surface and/or groundwater in a localized area to just below the bottom of an excavation. Such temporary dewatering, if needed, would only have an effect on groundwater levels in the immediate vicinity of an excavation area, and would not result in a substantial deficit in groundwater levels or well interference. The proposed project would not impede sustainable management of the local groundwater basin. The impact would be less than significant.

Significance Level: 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 erosion or siltation on- or off-site?

Comment:

A single drainage swale that functions to direct rainfall runoff from adjacent vineyards and River Road intersects with the proposed bank reconstruction and stabilization project. The alignment and outlet of the drainage swale at the river will not be impacted and surface drainage patterns from the river terrace above the top of bank will be unaltered and not adversely impacted. In fact, the swale outlet will be integrated with the project structure to improve stability and function of the drainage.

In addition, the primary purpose of the bank reconstruction and stabilization project is specifically to re-establish a stable bank to address active erosion and bank retreat that is resulting in significant sediment delivery to the river channel. The project resets the bank profiles and geometry conforming with existing grades on the river terrace and adjacent upland areas. The bank stabilization structure including vegetated rock slope protection (rip rap) and the integral bendway weirs are pervious structures. The bank stabilization structure will be constructed primarily of large rock as well as a graded mix of gravels, sands and soil to fill voids within the structure. The bank structure materials and construction details are pervious and will support natural drainage from the river terrace as well as within and over the reconstructed bank. Diverse plantings incorporated in the project will 1) intercept and slow drainage from upland areas to the channel and 2) will support soil stability through the establishment of root systems throughout the bank. Impervious structures are not included in the design and, therefore, the design will not result in substantial erosion or siltation on- or off-site.

Construction and Operation

Soils in the project area have a low to high susceptibility of erosion. Temporary vegetation removal, grading, and excavation, including in-channel grading, could result in soil erosion; however, standard BMPs, including erosion control measures, would be incorporated into the project to comply with the RWQCB's Water Quality Control Plan. Specific measures such as silt fencing and wattles will be used throughout the construction period to manage potential sediment impacts. In addition, the vegetated rock slope protection, vegetated soil lifts and transitional slopes, key elements of the bank reconstruction and stabilization structure, are long term erosion protection measures and also incorporate a range of BMPs to avoid erosion. Areas of vegetation removal will be revegetated with a mix of native riparian plant and tree species and seeding. On-site and off-site erosion and sedimentation would be controlled to the extent practicable during the construction period. In addition, once constructed, the project will permanently stabilize the river bank and would not result in substantial erosion or siltation on- or off-site. The impact would be less than significant.

Significance Level: Less than Significant

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

Comment:

Existing surface runoff drainage areas above the top of bank will not be altered or adversely impacted. The existing drainage swale along River Road will be maintained under project conditions. Proposed improvements within the channel will not increase the amount of surface runoff. Conversely, the proposed improvements including diverse native revegetation will intercept and slow local runoff and provide an increased and improved area for ground infiltration of drainage prior to reaching the river. The proposed improvements will not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site.

Construction and Operation

The proposed project would not be expected to cause on- or off-site flooding. The bank reconstruction and stabilization project has been analyzed and designed to provide flow conveyance consistent with the current flood regime and functions within this reach of the river. Proper installation, monitoring and long-term maintenance of the project including the vegetated rock slope protection, bendway weirs and drainage swale would be conditionally required. Existing drainage patterns including runoff from the adjacent vineyards and roadway will not be significantly affected.

Significance Level: Less than Significant

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?

Comment:

The proposed improvements will not 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. The proposed improvements to the river bank are not located within the site scale catchments and will not alter the existing surface water runoff regime or capacity of existing drainage facilities and therefore, the runoff capacity will be maintained in the current condition. The majority of the proposed improvements – vegetated rock slope protection, bendway weirs and riparian benches - are located within areas of the existing river channel and banks. These features and will create restored riparian habitat. The restored riparian habitat will be comprised of imported rock, clean import soil materials, salvaged woody material (trees) and native vegetation (plants and trees). The materials used for construction will not create additional sources of polluted runoff. The proposed improvements will provide approximately three (3) acres of riparian habitat that includes frequently inundated benches to support emergent wetland plant species and dense stands of willow, cottonwood and alder trees.

Construction and Operation

As described above, the proposed project would include new vegetated riparian areas along the river bank. New vegetated low impact development treatment areas would be implemented into the design in coordination with the North Coast Water Quality Control Board (NCWQCB) Section 401 Water Quality Certification for the project, to the extent feasible, which would help increase surface water infiltration adjacent to the roadway, minimize surface water runoff, and provide water quality treatment. Cross culverts would be extended to continue to convey flows similar to existing drainages, which would have adequate conveyance capacity. The proposed project would not exceed the capacity of existing or planned stormwater drainage systems or result in substantial additional sources of untreated polluted runoff.

Significance Level: Less than Significant

iv. Impede or redirect flood flows?

Comment:

The bendway weirs within the proposed project are designed to intercept and slow water velocities and reduce shear stresses along the bank, and to redirect flows away from the east bank to reduce erosion risks and move the river flow towards the middle of the channel. Hydraulic modeling of the proposed design condition demonstrates that the redirected river flows are not anticipated to impact the channel banks immediately downstream of the bank reconstruction and stabilization project. The hydraulic model evaluated the 2-yr, 10-yr and 100-yr recurrence interval peak flows and the effects of the proposed project on the magnitude and location of flow velocities are consistent across this range of flows. The zone of peak velocity (6 to 8 feet per second) lies adjacent to the toe of the riverbank along the length of the proposed project under existing conditions and extends about 150 feet beyond the downstream end of the project site. Under proposed project conditions, the width and length of the zone of peak velocity is reduced by about one-half and does not extend beyond the downstream end of the project site. Velocities are predicted to increase somewhat (from 4-5 feet per second to 5-6 feet per second) along the central portion of the site in a band about 75 ft wide in the center of the river. These changes are not expected to have geomorphic significance on the large gravel bar opposite the project site nor downstream of the project site. (Appendix E)

Construction

The Russian River would not be dewatered during construction. Temporary water diversion structures/systems would be used to route flows within the channel around the project to establish and keep the work area dry and control turbidity.

Based on hydraulic modeling and flood analysis, the floodplain and 100-year water surface elevations (WSE) would generally remain consistent with pre-project conditions. Changes in the extent and depth of inundation are minor, with local changes in depth on the order of tenths of a foot. Flows associated with the 10-year storm event and larger (including the 100-year storm) overtop the river bank at the project site under both existing and proposed conditions. No significant changes in floodplain flows or water surface elevations during a 100-year storm event are anticipated.

Significance Level: Less than Significant

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

Comment:

The proposed project is not located within a tsunami inundation zone as mapped by the California Office of Emergency Services, nor be exposed to risks from seiche. The impact would be less than significant.

Significance Level: Less than Significant

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

Comment:

Construction and Operation

The proposed project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. Adherence to construction provisions and precautions described in required National Pollutant Discharge Elimination System permits would be upheld, and best management practices would be required to be implemented to prevent violation of water quality standards or waste discharge requirements or degradation of water quality (see Impact (a) above). Operation of the proposed project would not impede sustainable groundwater management as the project would not utilize groundwater, interfere with groundwater recharge, generate growth, or increase water demands.

Significance Level: Less than Significant

11. LAND USE AND PLANNING:

Would the project:

a) Physically divide an established community?

Comment:

Construction and Operation

The physical division of an established community typically refers to the construction of a physical feature or removal of a means of access that would impair the mobility within an existing community, or between a community and outlying areas. The proposed project would merely provide restoration and stabilization to the east bank of the Russian River near River Road. The project would not physically divide an established community. No impact would result.

Significance Level: No Impact

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

Comment:

Construction and Operation

Section 65402 of the California Government Code of Regulations requires projects to be reviewed for conformity with applicable General Plans. In a letter dated March 14, 2024, the Sonoma County Permit and Resource Management Department reviewed the proposed project and found it to be consistent with the County General Plan.

With implementation of the mitigation measures contained in this document, the proposed project is consistent with regulations and policies adopted for the purpose of avoiding or mitigating environmental effects. The impact would be less than significant.

Significance Level: Less than Significant

12. MINERAL RESOURCES:

Would the project:

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

Comment:

Construction and Operation

The proposed project is not located in an area known to contain regionally significant mineral resources such as lands classified as State mineral resource zones. Therefore, the project would not result in the loss of availability of a known mineral resource of regional value. No impact would result.

Significance Level: No Impact

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

Comment:

Construction and Operation

The proposed project is not located in an area that has been identified by the County of Sonoma as a locally important mineral resource recovery site. Therefore, the proposed project would not result in the loss of the availability of any locally important mineral recovery site. No impact would result.

Significance Level: No Impact

13. NOISE:

Would the project:

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

Comment:

Construction

The County's General Plan and municipal code do not establish construction-related noise standards. However, the County's *Guidelines for the Preparation of Noise Analysis* recommends that temporary construction noise be evaluated at a qualitative level, given its temporary and short-term nature. Construction activities would primarily require the use of excavators, backhoes, pavers, and paving equipment. Using typical construction noise levels for public works roadway projects, noise from construction would range from 84 to 88 dBA Leq at a distance of 50 feet. However, noise levels typically attenuate (or drop off) at a rate of 6 dB per doubling of distance from point sources. During construction, anticipated to take 7 months, noise would be temporary and intermittent in nature. Construction activities would be relatively minor (i.e., would not require pile driving, structure demolition, blasting or other such construction techniques) and would not produce excessive levels of noise. Based on the type and extent of work to be performed, nighttime construction is not anticipated, and would only be performed under the approval of the County's Resident Engineer. However, because construction would occur near sensitive residential receptors, the temporary increase in noise is considered potentially significant. (Appendix F) Implementation of Mitigation Measure NOI-1 would reduce the temporary construction noise impact on adjacent sensitive receptors to a less-than-significant level by requiring the implementation of noise control measures that would reduce construction-phase noise generation.

Operation

Policy NE-1b of the County General Plan establishes a standard of reducing exterior noise from traffic on public roadways to 60 to 65 dB Ldn or less in outdoor activity areas and reducing interior noise levels to 45 dB Ldn or less with windows and doors closed.

The proposed project would install scour protection and stream bank stabilization measures at the left (east) bank of the Russian River. The proposed project does not generate growth, new vehicle trips, or new stationary noise sources. Operational noise impacts would not result.

Significance Level: Potentially Significant Unless Mitigated

Mitigation:

Mitigation Measure NOI-1: Reduce Construction Noise. To reduce construction noise, the County shall require the contractor to implement the following measures:

- Limit hours of construction to avoid the early morning and evening hours (such as 7 am to 7 pm weekdays and 7 am to 5 pm weekends).
- Limit work to non-motorized equipment on Sundays and holidays.
- Use sound blankets for loud operations such as air compressors or other mechanical equipment.
- Site construction staging areas as far as practical from nearby sensitive receptors.
- Require street legal mufflers on construction equipment.



SOURCE: ESA, 2024; Google Earth, 2024

Russian River-River Road Bank Stabilization Project

Figure 9
Sensitive Receptor Locations near the Project Site

b) Result in generation of excessive groundborne vibration or noise levels?

Comment:

Construction

Construction activities can cause vibration that varies in intensity depending on several factors. The construction of the project may generate perceptible vibration when heavy equipment is used close to sensitive receptors, such as excavators, backhoes, pavers, and paving equipment. Vibration levels vary depending on soil conditions, construction methods, and equipment used. Vibration levels are highest close to the source, and then attenuate with increasing distance. Construction would not require pile driving, structure demolition, blasting or other such construction techniques.

The primary concern with construction-induced vibration is the potential to damage an adjacent structure, either cosmetically (e.g., minor cracking of building elements), or threatening the integrity of the building. The Noise Study prepared by ESA, 2024, analyzed vibration impacts, using vibration damage threshold criteria expressed in peak particle velocity (PPV) for architectural damage. The California Department of Transportation (Caltrans) recommends a vibration limit of 0.5 in/sec PPV for new residential and modern commercial/industrial structures, 0.25 in/sec PPV for older residential structures and historical buildings. The Noise Study found that these impacts would not exceed building damage thresholds for the closest structures, and therefore, the impact with regard to vibration generated by construction activities would be less than significant.

Operation

Following construction, no sources of groundborne vibration or groundborne noise would be generated by the proposed project. Therefore, the project would not result in exposure of persons to or generation of excessive groundborne vibration or noise levels. No operational impact would result.

Significance Level: 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?

Comment:

Construction and Operation

The proposed project is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport is Healdsburg Airport, located approximately four miles southwest of the proposed project. No impact would result.

Significance Level: No Impact



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SOURCE: ESA, 2024; Google Earth, 2024

Russian River-River Road Bank Stabilization Project

Figure 10
Off-Site Haul Routes



14. POPULATION AND HOUSING:

Would the project:

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

Comment:

Construction and Operation

The proposed project does not involve construction of new housing or businesses, nor extension of roads or other infrastructure. The proposed project is a bank restoration project in the Russian River near River Road. The project does not add vehicular travel lanes on River Road and would not generate population growth or new vehicle trips. No impact would result.

Significance Level: No Impact

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

Comment:

Construction and Operation

The proposed project would not result in the removal of housing or displacement of residents. The impact would be less than significant.

Significance Level: Less than Significant

15. PUBLIC SERVICES:

Would the project:

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

i. **Fire protection?**

ii. **Police?**

Comment:

Construction and Operation

The proposed project is a bank stabilization and restoration project on the Russian River near River Road. During construction, River Road would remain open to traffic during construction and control measures would be implemented per the California Manual on Uniform Traffic Control Devices. The proposed project would not reduce the width of travel lanes along River Road, which would continue to adequately accommodate fire protection and police vehicles. The project does not add vehicular travel lanes on River Road and would not generate population growth or add new vehicle trips. The project would not require expanded fire or police protection facilities to maintain acceptable service ratios, response times, or other performance objectives. No impact would result.

Significance Level: No impact

iii. **Schools?**

Comment:

Construction and Operation

The proposed project is a bank stabilization and restoration project on the Russian River near River Road and would not result in an increase in the County's student population. No new or expanded schools would be required. No impact would result.

Significance Level: No Impact

iv. **Parks?**

Comment:

Construction and Operation

The proposed project is a bank stabilization and restoration project on the Russian River near River Road. It would not cause any increased park use such that new or expanded parks would be required. No impact would result.

Significance Level: No Impact

v. Other public facilities?

Comment:

Construction and Operation

The project does not involve residential development or new employment generating land uses and would therefore not generate an increase in the County's population. No major additional public services, such as libraries, would be required to serve the proposed project. No impact would result.

Significance Level: No Impact

16. RECREATION:

Would the project:

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

Comment:

Construction and Operation

The proposed project is a bank stabilization and restoration project on the Russian River near River Road and would have no effect on any existing neighborhood, regional parks, or other recreational facilities.

No impact would result.

Significance Level: No Impact

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

Comment:

Construction and Operation

The proposed project is a bank stabilization and restoration project on the Russian River near River Road and would not directly or indirectly induce population growth in the project area. The proposed project would not materially increase the use of recreational facilities which may have an adverse physical effect on the environment. No new or expanded recreational facilities would be required. No impact would result.

Significance Level: No Impact

17. TRANSPORTATION/TRAFFIC:

Would the project:

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

Comment:

Construction and Operation

The proposed project is a river bank restoration that will have a short-term temporary impact on local traffic on River Road during construction activities. The project will not conflict with a program plan, ordinance or policy addressing transit, roadway, bicycle and pedestrian facilities.

Sonoma County Permit and Resource Management Department reviewed the proposed project and found it to be consistent with the goals, objectives, and policies of the Circulation and Transit Element of the County's General Plan. No impact would result.

Significance Level: No Impact

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

Comment:

Construction and Operation

The proposed project would not increase vehicle traffic or vehicle miles traveled because the project does not increase the vehicular capacity of River Road or result in traffic-generating land uses. The proposed project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). No impact would result.

Significance Level: No Impact

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

Comment:

Construction and Operation

The proposed project would not introduce a new use or geometry that would substantially increase a hazard in the roadway. No impact would result.

Significance Level: No Impact

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

Comment:

Construction

River Road in the project area is a primary emergency evacuation route for adjacent land uses in the area. During construction, the normal functionality of River Road may be temporarily altered with partial lane closures and traffic controls to accommodate construction activities, which is a potentially significant impact on emergency access. Implementation of Mitigation Measure HAZ-1 in Section 9 of this Initial Study would ensure adequate traffic access for emergency responders during construction, reducing the impact to less than significant.

Operation

Operation of the proposed project would have no long-term impacts on emergency access. River Road be restored and fully functional following construction. The proposed project would not reduce the width of travel lanes along River Road, which would continue to adequately accommodate fire protection and police vehicles. No operational impact would result.

Significance Level: Potentially Significant Unless Mitigated

Mitigation:

Mitigation Measure HAZ-1: Minimize Emergency Evacuation Impacts during Construction.

During construction, the County and its contractor shall implement traffic controls to ensure River Road remains a viable emergency evacuation route, including:

- During construction, through traffic shall be maintained through temporary signals, flaggers or other means.
- Access to driveways and public and private roads shall be maintained, as feasible, by using steel trench plates. If access must be restricted for brief periods (more than one hour), property owners shall be notified by the County and its contractor in advance of such closures.
- Construction shall be coordinated with emergency service providers and administrators of land uses that may be more affected by traffic impacts, such as fire stations, schools, hospitals, and ambulance providers. As construction progresses, emergency providers, and other land uses as mentioned above, shall be notified in advance of construction of the timing, location, and duration of construction activities and the locations and durations of any temporary detours and/or lane closures.
- The contractor shall be required to have ready the means necessary to accommodate access by emergency vehicles, such as plating over excavations, flaggers or other means.

18. TRIBAL CULTURAL RESOURCES

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

Comment:

Construction and Operation

Assembly Bill (AB) 52 requires CEQA lead agencies to evaluate the potential impact of a project on tribal cultural resources. Such resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources. AB 52 also gives CEQA lead agencies the discretion to determine, based on substantial evidence, whether a resource qualifies as a tribal cultural resource.

In compliance with PRC Section 21080.3.1(b), the County provided formal notification of the proposed project to California Native American tribal representatives. The County sent letters to the following Native American Tribes on March 1, 2023:

- Lytton Rancheria of California
- Federated Indians of Graton Rancheria
- Cloverdale Rancheria of Pomo Indians
- Dry Creek Rancheria Band of Pomo Indians
- Kashia Pomos Stewarts Point Rancheria
- Middletown Rancheria Band of Pomo Indians
- Mishewal Wappo Tribe of Alexander Valley
- Guidiville Indian Rancheria
- Muwekma Ohlone Tribe San Francisco Bay Area
- Pinoleville Pomo Nation
- Robinson Rancheria of Pomo

Responses were received from the Federated Indians of Graton Rancheria and Lytton Rancheria. Both Tribes were not interested in consulting on the proposed project. No other responses to the County's AB 52 notice were received.

Coordination with Native American Tribal representatives was also conducted as part of the Cultural Resources Inventory Report (ESA 2024) that was completed for the project. This included review of the Native American Heritage Commission (NAHC) Sacred Lands File relative to the project area, which did not identify any recorded resources.

Based on the County's coordination with Tribal communities, construction-related ground disturbance has the potential to inadvertently affect Native American tribal cultural resources. If such resources were encountered, a potentially significant impact could result. Implementation of Mitigation Measures

CR-1 and CR-2 would reduce the potential impact to a less-than-significant level by outlining procedures to be taken in the event of inadvertent discovery consistent with Tribal considerations and appropriate laws and requirements.

Following construction, no earthwork would occur. No operational impact would result.

Significance Level: Potentially Significant Unless Mitigated

Mitigation:

Mitigation Measure CR-1: Protect Archaeological Resources and Tribal Cultural Resources if Encountered during Construction. To limit potential impacts on archaeological resources, the project specifications shall require the contractor to comply with the following measures regarding the discovery of cultural resources, including Native American Tribal Cultural Resources and items of historical and archaeological interest:

- The County's Construction Inspector and construction personnel shall be notified of the possibility of encountering cultural resources during project construction.
- The County shall notify the Tribal Historic Preservation Officers (THPOs) of the appropriate Native American Tribes in writing at least five days prior to the start of the project's ground-disturbing activities that work will commence.
- Prior to initiation of ground-disturbing activities, the County shall arrange for construction personnel to receive training about the kinds of cultural materials that could be present at the project site and protocols to be followed should any such materials be uncovered during construction. An archaeologist who meets the U.S. Secretary of Interior's professional standards (48 CFR Parts 44738-44739 and Appendix A to 36 CFR 61) shall provide the appropriate archaeological training, including the purpose of the training to increase awareness and appropriate protocols in the event of an inadvertent discovery.
- The project specifications will provide that if discovery is made of items of historical, archaeological, or cultural interest, the contractor will immediately cease all work activities in the area of discovery. Historical, archaeological, and cultural indicators may include, but are not limited to, dwelling sites, locally darkened soils, stone implements or other artifacts, fragments of glass or ceramics, animal bones, and human bones. After cessation of excavation, the contractor will immediately contact the County's Construction Inspector and the THPOs. The contractor will not resume work until authorization is received from the Construction Inspector.
- Should an archaeological deposit be encountered during ground disturbance in the project area, all ground-disturbing activities within 25 feet shall be stopped. The County Construction Inspector shall notify a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology contacted to assess the situation and make recommendations for the treatment of the discovery. If the deposit is found to be significant (i.e., eligible for listing in the NRHP) and an adverse effect would occur, the County in consultation with the SHPO shall identify appropriate treatments for the discovery.

Mitigation Measure CR-2: Protect Human Remains if Encountered during Construction. To limit potential impacts on human remains, the County shall implement the following measures:

- In the event that human remains are identified during project construction, these remains must be treated in accordance with Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the Public Resources Code, as appropriate.
- Section 7050.5 of the California Health and Safety Code states that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority.

- If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendent (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.
- Section 5097.98 of the Public Resources Code states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify those persons (i.e., the MLD) it believes to be descended from the deceased. With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

19. UTILITIES AND SERVICE SYSTEMS:

Would the project:

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

Comment:

Construction and Operation

No additional off-site storm water facilities beyond those evaluated in this Initial Study would be necessary to serve the project. The proposed project would not generate wastewater or result in a substantial long-term increase in water demand. No new or expanded water, wastewater, storm water, or other utility facilities would become necessary to serve the project. The impact would be less than significant.

Significance Level: Less than Significant

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

Comment:

Construction and Operation

The proposed project is restoration of the east bank of the Russian River at River Road, construction activities, dust control and the establishment of new trees and landscaping, would require a minimal amount of water use. Such water use would be sufficiently accommodated by existing water supplies. The proposed project would not result in a long-term increase in water demand. No new water supplies would be required. No impact would result.

Significance Level: No Impact

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

Comment:

Construction and Operation

The proposed project would not result in the generation or discharge of wastewater. No impact on wastewater capacity would result.

Significance Level: No Impact

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

Comment:

Construction and Operation

During construction, the construction contractor would be responsible for controlling and disposing of solid waste in accordance with federal, state, and local statutes and regulations. Construction waste with no practical reuse or that cannot be salvaged or recycled would be disposed of at a local landfill. Solid waste generated during construction of the project would represent a small fraction of the daily permitted tonnage of local landfill facilities and would be sufficiently accommodated. Following

construction, the proposed project would not generate solid waste. The overall impact would be less than significant.

Significance Level: Less than Significant

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

Comment:

Construction and Operation

During construction, solid waste would be required to be disposed of in accordance with federal, state, and local statutes and regulations. Only construction waste with no practical reuse or that cannot be salvaged or recycled would be disposed of at a local landfill. Following construction, the proposed project would not generate solid waste. No impact would result.

Significance Level: No Impact

20. WILDFIRE

Would the project:

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

Comment:

Construction

As described in Section 9, impact (f), River Road in the project area is a primary emergency evacuation route for adjacent land uses in the area. During construction, the normal functionality of River Road may be temporarily altered with traffic controls to accommodate construction activities, which is a potentially significant impact on emergency response and evacuation. Implementation of Mitigation Measure HAZ-1 would ensure adequate traffic access for the public and emergency responders during construction and during a potential evacuation scenario, reducing the impact to less than significant.

Operation

Operation of the proposed project would not impair or interfere with the County's emergency response plan or established emergency evacuation travel routes. River Road would be restored and fully functional as an evacuation travel route following construction. No operational impact would result.

Significance Level: Potentially Significant Unless Mitigated

Mitigation Measure HAZ-1: Minimize Emergency Evacuation Impacts during Construction.

During construction, the County and its contractor shall implement traffic controls to ensure River Road remains a viable emergency evacuation route, including:

- During construction, through traffic shall be maintained through temporary signals, flaggers or other means.
- Access to driveways and public and private roads shall be maintained, as feasible, by using steel trench plates. If access must be restricted for brief periods (more than one hour), property owners shall be notified by the County and its contractor in advance of such closures.
- Construction shall be coordinated with emergency service providers and administrators of land uses that may be more affected by traffic impacts, such as fire stations, schools, hospitals, and ambulance providers. As construction progresses, emergency providers, and other land uses as mentioned above, shall be notified in advance of construction of the timing, location, and duration of construction activities and the locations and durations of any temporary detours and/or lane closures.
- The contractor shall be required to have ready the means necessary to accommodate access by emergency vehicles, such as plating over excavations, flaggers or other means.
- The contractor shall coordinate traffic control plans with other simultaneous construction projects along River Road, if any, to minimize impacts to congestion, emergency access, and alternative modes of transportation.

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

Comment:

Construction

River Road in the project area is situated between areas of Local Responsibility to the east and areas of State Responsibility to the west. According to CAL FIRE'S Fire Hazard Severity Zone mapping, the State Responsibility Areas contiguous to the west side of River Road have been designated as a moderate to high fire hazard severity zone. The Local Responsibility Areas contiguous to the east side of River Road have been designated as very high fire hazard severity zone. According to the Sonoma County Wildfire Hazard Index, River Road in the project area crosses an area categorized as a Moderate to high wildfire hazard area.

As described in Section 9, impact (g), if construction activity occurs during the dry season, it is possible that accidental fire ignition could occur related to use of heavy machinery. Because vegetation along the project corridor could be dry during construction, and because of the close proximity of nearby residences and other land uses, the construction-related impact is considered significant. Implementation of Mitigation Measure HAZ-2 would require the use of construction techniques that would reduce the likelihood of wildland fires during construction to less than significant.

Operation

Following construction, disturbed areas would be restored, and the project would not increase the risk of wildland fires. No operational impact would result.

Significance Level: Potentially Significant Unless Mitigated

Mitigation:

Mitigation Measure HAZ-2: Reduce Wildland Fire Hazards. At the start of construction, the County and its contractor shall remove or clear away dry, combustible vegetation from within the area of direct impact. Grass and other vegetation less than 18 inches in height above the ground shall be maintained in the construction area where necessary to stabilize the soil and prevent erosion. Vehicles shall not be parked in areas where exhaust systems contact combustible materials. Fire extinguishers shall be available to assist in quickly extinguishing any small fires, and contractors shall have on site the direct phone number for the local fire departments.

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

Comment:

Construction and Operation

The proposed project is erosion protection, bank stabilization and riparian habitat restoration as such, the proposed project would not require the installation of infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. The impact would be less than significant.

Significance Level: Less than Significant

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

Comment:

Construction and Operation

According to USGS landslide mapping, the proposed project is in an area designated primarily as “flat land”. The proposed project is erosion protection, bank stabilization and riparian habitat restoration and does not include residential or commercial developments or structures. No hillsides or geologic structures known to be at risk of landslide are located adjacent to the project corridor. The proposed project does not involve large cuts and fills or work adjacent to high fire hazard zones, and would use adequate precautions to prevent fire incidents during construction. The impact would be less than significant.

Significance Level: Less than Significant

21. 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 a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Potential project impacts to biological and cultural resources are addressed in Section 3.4, Biological Resources, Section 3.5, Cultural Resources, and Section 3.18, Tribal Cultural Resources, respectively. With implementation of the recommended mitigation measures identified in this Initial Study, the potential for project-related activities to degrade the quality of the environment, including wildlife species or their habitat, plant or animal communities, or important examples of California history or prehistory would be reduced to less-than-significant levels.

Significance Level: Potentially Significant Unless Mitigated

- 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)?**

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

Regarding what constitutes a probable future project, generally a project should be viewed as a probable future cumulative project once the environmental review process for such a future project is underway or there is evidence showing that such a project is feasible, probable or sufficiently certain to occur. Efforts to identify cumulative projects included review of County Public Infrastructure projects, including county road paving projects, road projects, bridge replacement projects, and underground utility projects, as well as development projects in the project area and projects in the unincorporated town of Geyserville.

Based on current schedules, construction of the proposed project is not anticipated to overlap with construction of cumulative projects in the immediate area and would not add appreciably to any existing or foreseeable future cumulative impact. As summarized in this Initial Study, the project would not result in impacts on mineral resources, public services, or recreation. Therefore, implementation of the project would not contribute to any related cumulative impact on those resources. The planned bank restoration of the east bank of the Russian River in the project area would not contribute to cumulative impacts, such as traffic, noise, or air quality impacts. If the temporary construction activity associated with the project overlaps with a cumulative project in the immediate area, a slight increase in dust generation and exhaust emissions, construction noise, and construction vehicles accessing the area could result. The project impacts summarized in this Initial Study would not add appreciably to a foreseeable future significant cumulative impact. The impacts of the proposed project would be mitigated to a less-than-significant level, and incremental impacts, if any, would be very small, and the cumulative impact would be less than significant.

Significance Level: Less than Significant

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

With implementation of the recommended mitigation measures identified in this Initial Study, the potential for project-related activities to cause substantial adverse effects on human beings would be reduced to less-than-significant levels.

Significance Level: Potentially Significant Unless Mitigated

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