
Final CEQA MITIGATED NEGATIVE DECLARATION/INITIAL STUDY

Prepared For

**Sonoma County
Public Infrastructure**

Todd Road and Standish Avenue Intersection Improvements Project

Publication Date: September 2025
Sch. No. 2025091118

Prepared by

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Project Title: Todd Road and Standish Avenue Intersection Improvements Project

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Project Location: Todd Road at Standish Avenue

APN: 134-102-070, 134-102-071, 134-102-084, 134-102-014, 134-171-052, 134-171-049, 134-171-050, 134-171-051

Zoning: M2: Heavy Industrial District, M3: Limited Rural Industrial District, and RR: Rural Residential District

Project Purpose: The purpose of the proposed Todd Road and Standish Avenue Intersection Improvements Project (project) is to improve the intersection of Todd Road at Standish Avenue to meet current Sonoma County standards and signalize the intersection to facilitate current and projected traffic movements including large truck traffic.

This Initial Study is required by the California Environmental Quality Act (CEQA) and was prepared by TYLin with supporting documentation from Rincon, Inc. and TJKM, Inc. Information on the proposed project was provided by the Project Applicant and TYLin engineers. Technical studies referenced in this document are available for review at Sonoma County Public Infrastructure and include:

- Biological Resources Assessment, Rincon Inc., January 2021
- Supplemental Memorandum to the Biological Resources Assessment for the Todd Road/Standish Avenue Signalization Project, Rincon Inc., March 2024
- Cultural Resources Assessment, Rincon Inc., January 2021
- Construction Noise Assessment, Rincon Inc., January 2021
- Todd Road and Standish Avenue Intersection Improvement Project – Construction Noise Assessment, TYLin, February 2024
- Phase I Environmental Site Assessment, Rincon Inc., January 2021
- Todd Road and Standish Avenue Intersection Improvement Project - Phase I Environmental Site Assessment, TYLin, February 2024
- Traffic Management Technical Memorandum, TJKM Inc., February 2021
- Todd Road and Standish Avenue Intersection Improvement Project – Traffic Management Technical Memorandum, TYLin, February 2024
- Todd Road and Standish Avenue Intersection Improvement Project – Logical Termini, TYLin, December 2023

Environmental Finding: Based on the attached Initial Study, the proposed project described above will not have a substantial adverse impact on the environment, provided that the mitigation measures identified in the Initial Study are included in the Project.

Initial Study: See attached. For more information, call Olguin P. Caban, Phone: (707) 565-2857.

Mitigation Measures: Included in the attached Initial Study. The project applicant has agreed to implement all mitigation measures.

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ACRONYMS/ABBREVIATED TERMS

AB	Assembly Bill
ABAG	Association of Bay Area Governments
AC	Asphalt Concrete
ADA	Americans with Disabilities Act
ADL	Aerially Deposited Lead
APN	Assessor's Parcel Number
ASTM	American Society for Testing and Materials
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practices
BRA	Biological Resources Assessment
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CALFire	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCAP	Community Climate Action Plan
CCR	California Code of Regulations
CDC	California Department of Conservation
CDFW	California Department Fish and Wildlife
CEQA	California Environmental Quality Act
CFGC	California Fish and Game Code
CGS	California Geological Survey
CHRIS	California Historical Resources Information System
CMP	Construction Management Plan
CNPS	California Native Plant Society
CO	Carbon Dioxide
CRA	Cultural Resources Assessment
CRPR	California Rare Plant Rank
CRHR	California Register of Historical Resources
CTS	California Tiger Salamander
DPM	Diesel Particulate Matter
DOC	Department of Conservation
DOT	Department of Transportation
DTSC	California Department of Toxic Substances Control
EDR	Environmental Data Resources
EIR	Environmental Impact Report
ESA	Endangered Species Act
ESA	Environmental Site Assessment
ESL	Environmental Screening Levels
FEMA	Federal Emergency Management Agency
FTA	Federal Transit Administration
GHG	Greenhouse Gas
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
MLD	Most Likely Descendant
MRZ	Mineral Resource Zones
MT	Metric Ton
MTC	Metropolitan Transportation Commission
NAAQS	National Ambient Air Quality Standards

NAHC	Native American Heritage Commission
NM	Noise Measurement
NO _x	Nitrogen Oxides
NO ₂	Nitrogen Dioxide
NPDES	National Pollutant Discharge Elimination System
NRCS	National Resources Conservation Service
NWPT	Northwestern Pond Turtle
O ₃	Ozone
OEHHA	Office of Environmental Health Hazard Assessment
OSRC	Open Space and Resource Conservation Element
PG&E	Pacific Gas & Electric Company
PM	Particulate Matter
PPV	Peak Particle Velocity
PRC	Public Resources Code
RCNM	Roadway Construction Noise Model
RCRA	Resources Conservation and Recovery Act
REC	Recognized Environmental Conditions
ROG	Reactive Organic Gases
RR	Rural Residential
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SFBAAB	San Francisco Bay Area Air Basin
SLF	Sacred Lands File
SMP	Soil Management Plan
SO ₂	Sulfur Dioxide
SR	State Route
SWPPP	Stormwater Pollution Prevention Plan
TAC	Toxic Air Contaminant
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	Underground Storage Tank
VMT	Vehicle Miles Traveled

PROJECT DESCRIPTION

Sonoma County is proposing to upgrade the intersection at Todd Road and Standish Avenue with the installation of a traffic signal, storm drain inlets and sidewalk improvements. The Todd Road/Standish Avenue Signalization Project (project) is identified in the County of Sonoma and Sonoma Water Five Year Capital Improvement Plan 2020-2025.

Project Purpose

The purpose of the proposed project is to improve the intersection of Todd Road at Standish Avenue to meet current Sonoma County standards and signalize the intersection to facilitate current and projected traffic movements including large truck traffic.

Project Location and Existing Conditions

The proposed project is located south of the City of Santa Rosa in an urbanized area within the southern portion of unincorporated Sonoma County (Figure 1: Vicinity Map). Project limits and conceptual design are shown on Figure 2 (Project Limits and Conceptual Design). The existing intersection of Todd Road and Standish Avenue is a three-legged intersection with Standish Avenue under stop control. Todd Road is a two-lane east-west major collector that includes 150-foot long left turn lanes in each direction at the intersection with Standish Avenue. Standish Avenue is a two-lane north-south rural major collector and it is stop controlled at the intersection with Todd Road. A private property owner, Ghilotti Construction Inc., will align their private road, referred to as Ghilotti Avenue, directly opposite Standish Avenue. The Ghilotti Avenue roadway realignment is not part of this Project. Ghilotti Avenue is also stop controlled at Todd Road. Only the northeast quadrant of this intersection contains a sidewalk, however it is substandard and has an overhead power line pole and fire hydrant located within the sidewalk, reducing effective passage. There are no pedestrian crosswalks at this intersection. The Todd Road and Standish Avenue intersection is located approximately 1,900 feet west of the Highway 101 and approximately 600 feet west of the railroad tracks upon which the Sonoma-Marin Area Rail Transit runs regular passenger train service.

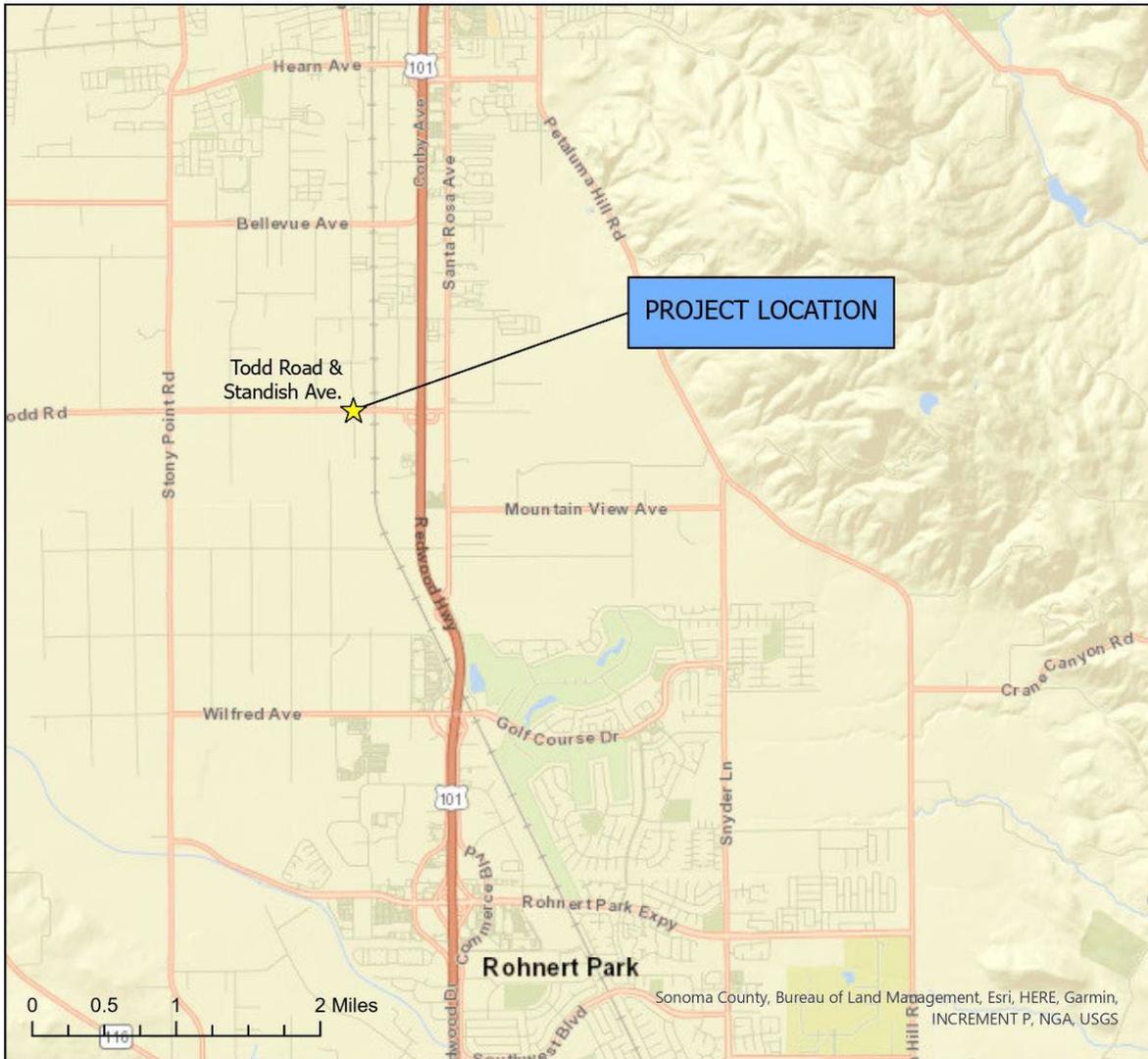
The proposed project would be constructed within an approximate 2.66-acre area and primarily within existing Sonoma County road rights-of-way. Existing land uses adjacent to the project site include light manufacturing and industrial use in the northwest corner and warehouse land use to the southeast corner with rural residential properties located at both the northeast and southwest corners. The broader project area includes a mixture of residential land uses to the east and rural residential and agricultural lands to the south and west.

Along the west side of Standish Avenue, a business sign, minor landscaping, and a few small diameter trees are present. A substantially larger tree along with moderate landscaping are present along the south side of Todd Avenue. Above ground power utility lines run parallel to the north side of Todd Road and west side of Standish Avenue. Other underground utilities within this intersection include water, gas, sanitary sewer, and storm drain systems.

Proposed Project Elements

The intersection improvements would include a traffic signal, standard curb radii improvement with sidewalk improvements and ADA compliant curb ramps at each leg of the intersection, including the connection to the privately developed road at Ghilotti Avenue. Additional crossing improvements include intersection crossing striping and push button crossings at each of the four new crossings, as well as Class II bicycle lanes and signage provided on both sides of Todd Road within the project limits. The proposed project has been designed in accordance with American Association of State Highways and Transportation Officials (AASHTO) standards using Caltrans Highway Design Manual (Caltrans, 2020) as directed by Circulation and Transit Element of the Sonoma County General Plan 2020. Todd Road's functional classification is a major collector and includes the right-of-way to accommodate future bicycle lanes

Figure 1. Vicinity Map

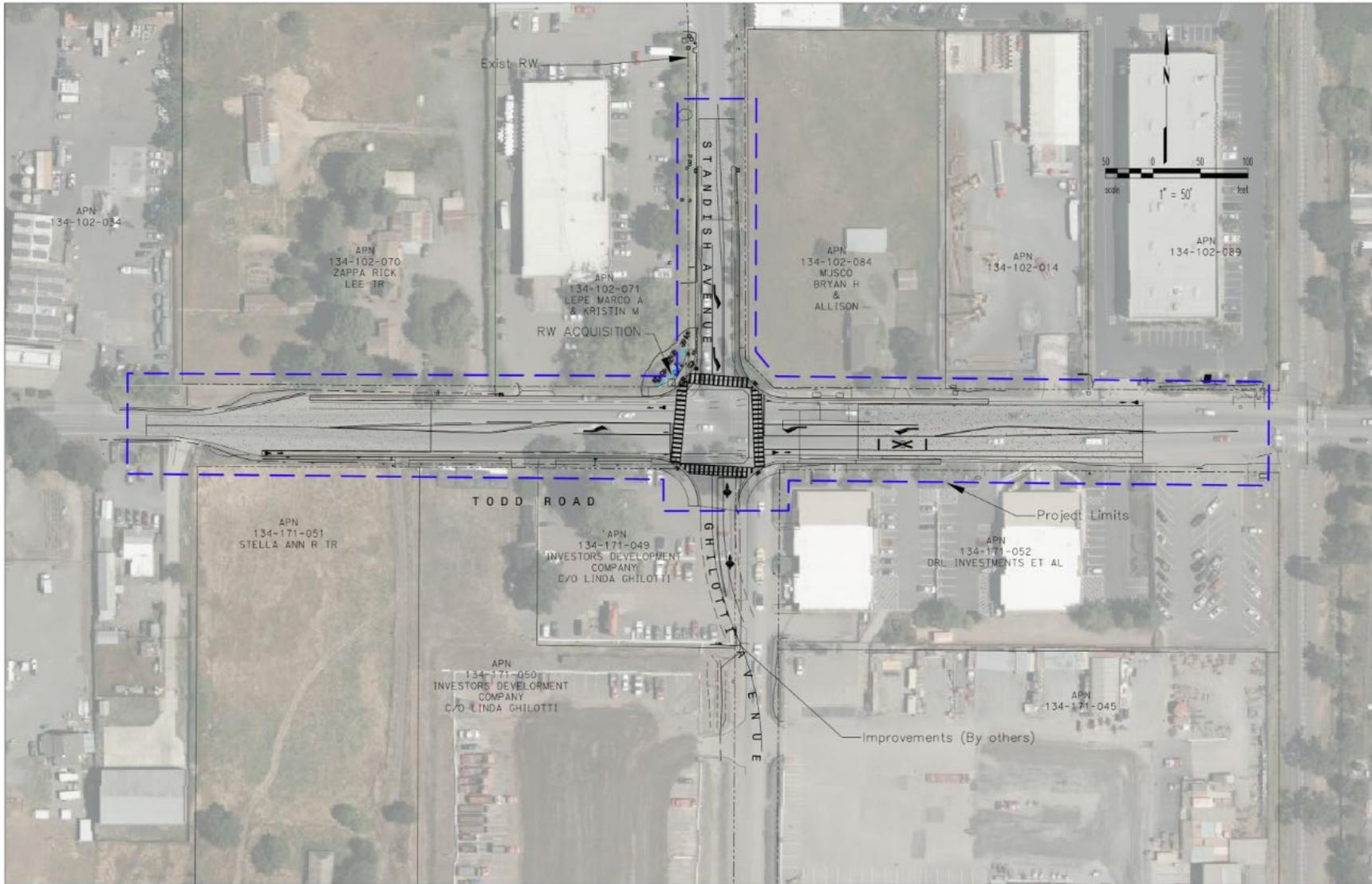


Todd Road at Standish Avenue
Signalization Project

★ Project Location



Figure 2. Project Limits and Conceptual Design



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consistent with Chapter 1000 of the Caltrans Highway Design Manual for a Class II Bikeway, as identified in the 2010 Sonoma County Bicycle and Pedestrian Plan and the Circulation and Transit Element of the Sonoma County General Plan 2020. The existing sidewalk in the northeast quadrant would be upgraded to Sonoma County standards for approximately 85 feet east of the intersection and can be widened while still allowing the utility pole to remain in place. The fire hydrant would be relocated to the back of the sidewalk. All curb ramp improvements would meet Americans with Disabilities Act (ADA) standards. The Class II bicycle lanes would be located on both sides of Todd Road between the western and eastern project limits (Figure 2). The bicycle lanes would extend approximately 450 feet west of the Todd Road/Standish Avenue intersection and approximately 550 feet east to the Sonoma Marin Area Rail Transit right-of-way for a total distance of approximately 1,000 feet. The intersection would include video detection to facilitate efficient signal controls including bicycle detection. The majority of improvements would be within existing Sonoma County right-of-way, with the exception of a small area to install the curb ramp at the northwest Todd Road/Standish Way intersection quadrant. The partial acquisition would equal a total of less than one-tenth of an acre of land.

The proposed project would involve roadway excavation at the intersection to connect power to the new traffic signal mast arms and new drainage inlets to connect with the existing and/or relocated storm drain lines. The depth of excavation would be approximately 10 feet for the signal mast arms and between 4 to 5 feet for the drainage improvements. The drainage improvements would occur within the existing right-of-way and the project improvement limits shown in Figure 2. No construction activities would occur within the drainage ditches along Todd Road. Vegetation removal is expected to include the removal of five trees along the south side of Todd Road and to the northeast curb return. A business sign on the northwest corner of the intersection is located within existing right-of-way and would also be relocated in cooperation with the property owner. The intersection pavement would be excavated within the project limits and new asphalt would be laid to conform to the four legs of the intersection to complete the construction process. The Project does not require future construction to fully utilize the design capabilities.

Project Construction

The conceptual construction plan would maintain traffic operations through the Todd Road and Standish Avenue intersection, including the private roadway Ghilotti Avenue, at all times with the assistance of flaggers as necessary to facilitate movements through narrowed lanes. Turn lanes would be temporarily eliminated to make room for two lanes of traffic. This may result in longer delays for turning movements during construction. Construction phasing would identify quadrants or one-half of each travel way and shift traffic onto the opposite side. The proposed project is expected to require approximately 40 – 50 working days to complete, dependent on variables such as weather and availability of needed materials. Due to heavy daytime traffic, the Contractor may be permitted to conduct nighttime construction activities or construction activities on Saturdays to reduce construction duration. A Construction Management Plan (CMP) would be prepared consistent with Caltrans Standards Specifications and Standard Plans with some exceptions to meet Sonoma County modifications. The CMP would be submitted to and approved by Sonoma County Public Infrastructure in advance of the notice to proceed with construction. The CMP would include construction sequence, traffic management plan, public outreach and notification plan and details on compliance with necessary permits.

Property access would be maintained during construction. The existing Sonoma County Transit bus stop for Route 42 (Santa Rosa, Industry West Business Park) on the north side of Todd Road and east of Standish Avenue, would need to be temporarily relocated east of the construction area during construction. The bus stop on the south side of Todd Road is outside of the project site and would not be affected by construction activities. Similarly, the SMART railway, which lies approximately 600 feet east of the Todd Road/Standish Avenue intersection, would not result in delays on traffic to and from the construction site. Traffic circulation would be maintained and not result in queues reaching the track and the trains passing over Todd Road are not more frequent than two per hour and less than a minute in duration.

The following provides a brief overview of anticipated construction practice to construct the intersection improvements.

Advanced notification of construction would be provided to property owners via signage postings a minimum of two weeks in advance of starting construction. Coordination with Sonoma County Transit in advance of construction would also occur to coordinate the temporary relocation of the bus stop as well as providing advance notice to transit users by placing signage at the bus stop. Prior to mobilization, erosion control best management practices would be installed. Construction would occur within a dry season (from late spring through early fall). Construction staging for the proposed project would be minimal and remain within the project site (Figure 2) and within the existing right-of-way.

Table 1 outlines the anticipated construction activities, duration and associated construction equipment needed for each task. Preparing the road right-of-way or construction area is referred to as clearing and grubbing. During the clearing phase, trees are felled. Grubbing refers to the clearing and removal of stumps and organic debris. Following removal of vegetative matter, the subgrade would be excavated, underground utilities would be exposed and relocated and/or adjusted to grade, and extension of the storm drainage lines and inlets would be installed. Water would be used to reduce dust. During this time, power and foundations for traffic signal masts would be installed. Once utilities are tested, concrete curbs, gutters, sidewalks and driveways curb cuts would be installed. The existing electrical power poles would be protected in place.

Next, fill can be compacted, and road base material installed. The Contractor may choose to switch travel lanes onto roadbed material or install a base layer of asphalt. Typically, grade asphalt layer is installed for the entire roadway in one to two days, with traffic shifting with the assistance of flaggers. Exposed soil areas within the construction area would be seeded with native-grass/ herb seeds. Final activity includes striping, testing signal operation, and transitioning traffic flow to a fully functional roadway.

Table 1. Anticipated Construction Sequence Activity, Duration, and Equipment

Construction Sequence of Activities	Duration (Days)	Associated Equipment
Underground service alert to identify utilities	1-2	None
Construction area Signs	1	None
Fence Environmentally Sensitive Areas	1	Hand tools
Reconfigure lanes (if needed)	1	portable grinder, Paint over existing paint
Clear & Grubbing	1-2	1-Backhoe, 2- 10-yard trucks
Sawcut existing pavement	1-2	Gas operated AC saw, wet vacuums
Place temporary barrier rails to delineate traffic	1	2-semi trailers, Backhoe/forklift
Remove existing drainage facilities	2	Backhoe/excavator, 2-10-yard trucks
Excavate drainage (Reinforced Concrete Pipes)	2	Backhoe/excavator
Install drainage pipes and backfill	1	Backhoe, compactor, water trailer tank
Electrical conduit and boxes	5	Small excavator/ditch witch, flatbed truck
Signal pole foundations excavate	1	Truck-mount auger, loader, 10-yardtruck
Signals foundation cages and template	1	Backhoe, flatbed
Signal pole foundation concrete	1	concrete truck
Drainage boxes	5	Backhoe, concrete truck
Place and compact base	3	Backhoe, compactor, water trailer tank
Grade and form curb and gutter	4	Backhoe, flatbed truck
Place concrete curb and gutter	1-2	concrete trucks
Remove temporary rail	1	Backhoe/forklift, semi-truck
Finish roadway	2	Backhoe, 10-yard truck, compactor
Repair existing pavement	1-2	Jackhammer, backhoe, 2-10-yard trucks, compactor
Asphalt Concrete overlay	1-2	Paver, 2-drum rollers, 3 semi-trucks, sweeper
After 21 days of curing, install poles	1-2	Truck-mount crane, flatbed

Construction Sequence of Activities	Duration (Days)	Associated Equipment
Install signals	2-3	Truck-mount crane/ bucket-truck, flatbed
Adjust manhole covers and survey monuments	3-5	Jackhammer, plate compactor, flatbed truck
Install roadway/bicycle lane striping	1	Striping rig

Construction Best Management Practices

Best management practices (BMPs) would be implemented as part of construction to minimize and/or avoid potential impacts during construction. BMPs would include, but not limited to, the following:

- Minimize the potential for erosion including the use of silt fencing.
- Prepare and implement an approved Stormwater Pollution Prevention Plan (SWPPP).
- Exposed soil areas within the construction area would be seeded with native-grass/ herb seeds.
- Ensure proper storage and disposal of hazardous materials.
- Fugitive dust control BMPs during site preparation and grading activities that would be implemented, as recommended by the Bay Area Air Quality Management District (BAAQMD) include:
 - All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times daily.
 - All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
 - All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
 - All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
 - All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.
 - 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.
 - All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
 - A publicly visible sign with the telephone number and person to contact at the Sonoma County regarding dust complaints shall be posted. This person shall respond and take corrective action within 48 hours. The BAAQMD’s phone number shall also be visible to ensure compliance with applicable regulations.

Possible Required Permits and Approvals

State and local agencies may potentially have jurisdiction regarding the development of the Project. Sonoma County Public Infrastructure will comply with all applicable regulations.

Table 2. Possible Permits and Approvals for the Proposed Project

Agency	Permit/Approval
Sonoma County Public Infrastructure	Property Easements
Sonoma County Permit Sonoma	Tree Protection and Replacement Ordinance No. 4014
North Coast Regional Water Quality Control Board	Construction National Pollutant Discharge Elimination System (NPDES) Construction General Permit
Regional Water Quality Control Board	Waste Discharge Requirements

Initial Study Checklist

Provided on the following pages is an Environment Checklist, based on Appendix G of the State CEQA 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 add incrementally 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 project applicant may choose to modify the project to avoid the impacts.
- **Less than Significant Impact with Mitigation:** 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.
- **Significant and Unavoidable Impact:** The project would have the impact described, and the impact could be significant and unavoidable. The impact cannot be reduced to less than significant by incorporating mitigation measures. An environmental impact report must be prepared for this project.

Each question on the checklist was answered by evaluating the project as proposed, that is, without considering the effect of added mitigation measures. The checklist includes a discussion of the impacts and mitigation measures that have been identified.

The Project Applicant, Sonoma County Public Infrastructure, has agreed to accept all mitigation measures listed in this checklist as conditions of approval of the proposed project and to obtain all necessary permits.

Native American Consultation

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code (PRC) section 21080.3.1? Yes No

If yes, ensure that consultation and heritage resource confidentiality follow PRC sections 21080.3.1 and 21080.3.2 and California Government Code 65352.4

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project could not have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

- I find that although the proposed project COULD have a significant effect on the environment, there WILL NOT be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

Sonoma County

Sonoma County Public Infrastructure,
Assistant Engineer

Title

Olguin P. Caban

Printed Name

9/23/2025

Date

1.1 AESTHETICS

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

Setting

The project site is within an urbanized area of unincorporated Sonoma County south of the City of Santa Rosa. The visual landscape is largely rural in nature with larger parcels of light industrial. The project site is located at an existing intersection with development at each of the four corners. Todd Road has a sidewalk on the northeast corner, but otherwise no sidewalks exist. Overhead utilities lines are positioned primarily along the north side of Todd Road. At the northwest side of the intersection, one streetlight is mounted on a utility pole. The terrain is flat with interspersed trees and vegetation consisting primarily of landscaping. The visual landscape includes a mixture of rural residences, agricultural lands and light industrial buildings. The west horizon provides views of the coastal mountains and the eastern views of the Sonoma Mountain range.

The project site is relatively flat and the surrounding area is undeveloped allowing for unobstructed views of the surrounding landscape of distant mountains. Visible elements of the proposed project would include the new signal lights on poles and mast arms and removed vegetation. Project elements would be at-grade and are, therefore, not expected to impair surrounding views.

Impact Analysis

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

No Impact. There are no designated scenic vistas in the project area. Based on the information on the locations of scenic landscape units identified on Figure OSRC-1, Scenic Resource Areas, in the Open Space and Resource Conservation Element of the Sonoma County General Plan (Sonoma County 2020), the project site is not located within an area designated as a Scenic Landscape Unit or Scenic Corridor. The proposed project is located within a developed area of unincorporated

Sonoma County with largely industrial related development adjacent to the project site. No impacts would occur.

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

No Impact. The project site is not located within or near a State Scenic Highway (Caltrans 2019) and does not contain scenic resources such as trees of scenic value rock outcroppings, or historic buildings. No impact would occur.

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

Less than Significant Impact. The proposed project is located within an urbanized portion of unincorporated Sonoma County in an area where the land uses are associated with primarily industrial related uses and is zoned for industrial related uses. There are no publicly accessible vantage points located within the project site. The proposed project is within the existing transportation right-of-way and does not result in a change the overall setting since the project remains primarily within the existing right-of-way. Because the proposed project does not result in a change to the overall setting and there are no scenic resources or vistas, a visual assessment consistent with Sonoma County Visual Assessment Guidelines (Sonoma 2019) was not conducted. Impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. The proposed project is located in an area of light industrial development and residences on larger parcels. Vehicle headlights and taillights and lighting associated with private residences and local businesses are primary existing sources of light and glare. Construction activities would not result in a new source of substantial light or glare, because construction activities would occur primarily during daylight hours. If nighttime construction is required given the overall short duration of construction impacts would be limited. Impacts during construction would be less than significant, and no mitigation is required.

During operation, the lighting within the project site would be the same as existing conditions and does not create a new source of substantial light or glare. The proposed project would replace the existing roadway intersection with a new signalized intersection, which would not cast light onto adjacent uses. No light standards would be installed, and no other light sources would be included, therefore, the proposed project would not create a new source of light or glare, which would adversely affect day or nighttime views. There would be no impacts during operation.

1.2 AGRICULTURE AND FOREST RESOURCES

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

Setting

The project site consists of developed areas including the existing roadway, industrial uses, and one residential building. Areas to the west of the project site are associated with agricultural uses. The project site is not mapped by the California Department of Conservation's Farmland Mapping and Monitoring Program as containing Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (CDC 2020). The project site is identified primarily as "Urban and Built-Up Land" and a small area "Farmland of Local Importance" is located in the southwest section (CDC 2020).

Impact Analysis

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

No Impact. There are no areas identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the project site. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance to a non-agricultural use. No impact would occur.

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

No Impact. The project site is zoned M2: Heavy Industrial District, M3: Limited Rural Industrial District, and RR: Rural Residential District and none of the parcels within the project site are under a Williamson Act contract (Sonoma County 2020). The proposed project would not conflict with existing zoning or a Williamson Act contract. No impact would occur.

c) *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources*

Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The project site contains no forest or timberland and is not zoned for forest land, timberland, or timberland production. As described above under b), the project site is zoned for M2: Heavy Industrial District, M3: Limited Rural Industrial District, and RR: Rural Residential District and none of the surrounding properties are zoned for forestry or timberland uses. The proposed project has no potential to conflict with existing zoning or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). No impact would occur.

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

No Impact. As noted in response c), the project site is not located on or near forest land. The proposed project would not result in the loss of forest land or convert forest land to a non-forest use. No impact would occur.

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

No Impact. The proposed project improves an existing unsignalized intersection with a signalized intersection. The proposed project does not impact farmland or forest land and would not involve other changes in the existing environment. No impact would occur.

1.3 AIR QUALITY

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

Methods

Emissions for construction of the intersection improvements were estimated using CalEEMod Version 2022.1.1.24. The modeling outputs are included in Appendix A of this document.

The proposed project would comply with applicable regulatory standards and best management practices as outlined in Bay Area Air Quality Management District (BAAQMD) guidance. This would include watering twice daily, a 12 percent unpaved road moisture content, and a 15-mph speed limit on unpaved roads. In addition, construction equipment would be required to meet at a minimum Tier 2 off road diesel engine standards as defined by the U.S. Environmental Protection Agency (USEPA) (USEPA 2016).

The proposed project would not result in the generation of new vehicle trips and therefore would not result in an increase in operational emissions. Therefore, no impacts from project operation would occur.

Setting

The project site is located just south of the City of Santa Rosa in central Sonoma County, which is a subregion of the San Francisco Bay Area Air Basin (SFBAAB) that is under the jurisdiction of BAAQMD.

As the local air quality management agency, the BAAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet them. The BAAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, as well as many other activities.

Depending on whether or not standards are met or exceeded, a local air basin is classified as in “attainment” or “non-attainment.” The BAAQMD is in non-attainment for the national standards for ozone (O₃) and particulate matter smaller than 2.5 microns in diameter (PM_{2.5}) and in non-attainment for the state standard for O₃, PM_{2.5}, and particulate matter smaller than 10 microns in diameter (PM₁₀) (CARB 2024).

Air Quality Management

The most recently adopted air quality plan in the SFBAAB is the 2017 Clean Air Plan. The 2017 Clean Air Plan is a roadmap showing how the San Francisco Bay Area will achieve compliance with the State one-

hour ozone standard as expeditiously as practicable, and how the region will reduce transport of O₃ and O₃ precursors to neighboring air basins.

The 2017 Clean Air Plan provides a regional strategy to protect public health and the climate. Consistent with the greenhouse gas (GHG) reduction targets adopted by the state, the 2017 Clean Air Plan lays the groundwork for a long-term effort to reduce Bay Area GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. To fulfill state O₃ planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of O₃ precursors—reactive organic gases (ROG) and nitrogen oxides (NO_x)—and reduce transport of ozone and its precursors to neighboring air basins. In addition, the 2017 Clean Air Plan builds upon and enhances the BAAQMD’s efforts to reduce emissions of fine particulate matter and toxic air contaminants (BAAQMD 2017a).

Air Emission Thresholds

Table 3 presents the BAAQMD CEQA significance thresholds for construction/demolition-related criteria air pollutant and precursor emissions used for the purposes of this analysis. These represent the levels at which a project’s individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAAB’s existing air quality conditions. For the purposes of this analysis, the proposed project would result in a significant impact if construction emissions would exceed one or more of the thresholds shown in Table 3.

Table 3. Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds
	Average Daily Emissions (lbs./day)
ROG	54
NO _x	54
PM ₁₀	82 (exhaust)
PM _{2.5}	54 (exhaust)
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices

Source: BAAQMD 2017a

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient to protect public health and welfare, with a margin of safety. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14, the elderly over 65, persons engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases. Therefore, most of the sensitive receptor locations are schools, hospitals, senior living centers, and residences. The nearest sensitive receptor is one residence located within the project site on northeast corner of Todd Road and Standish Avenue. There are other residences located about 500 feet from the project site and other sensitive receptors including schools, hospitals, and senior centers are located about 0.5 mile from the project site.

The USEPA is charged with implementing national air quality programs. USEPA’s air quality mandates are drawn primarily from the federal Clean Air Act (CAA), passed in 1963 by the U.S. Congress and amended several times. The federal CAA requires USEPA to establish primary and secondary National Ambient Air Quality Standards (NAAQS) for several criteria air pollutants. The air pollutants for which standards have been established are considered the most prevalent air pollutants known to be hazardous to human health. NAAQS have been established for ozone, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, and Pb.

The California CAA, signed into law in 1988, requires all areas of the State to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practical date. The CARB is the State air

pollution control agency and is a part of California Environmental Protection Agency or CalEPA. The CARB is the agency responsible for coordination and oversight of State and local air pollution control programs in California, and for implementing the requirements of the California CAA. The CARB oversees local district compliance with federal and California laws, approves local air quality plans, submits the State implementation plans to the USEPA, monitors air quality, determines and updates area designations and maps, and sets emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

California Ambient Air Quality Standards

The California CAA requires CARB to establish ambient air quality standards for California, known as CAAQS. Similar to the NAAQS, CAAQS have been established for criteria pollutants and standards are established for vinyl chloride, hydrogen sulfide, sulfates, and visibility-reducing particulates. In general, the CAAQS are more stringent than the NAAQS on criteria pollutants. The California CAA requires all local air districts to endeavor to achieve and maintain the CAAQS by the earliest practical date. The California CAA specifies that local air districts focus attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.

Impact Analysis

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

Less than Significant Impact. Under BAAQMD's methodology stated above in Methodology, a determination of consistency with CEQA Guidelines thresholds should demonstrate that a project:

1. Supports the primary goals of the 2017 Clean Air Plan,
2. Includes applicable control measures from the 2017 Clean Air Plan, and
3. Does not disrupt or hinder implementation of any 2017 Clean Air Plan control measures.

The following includes a discussion of consistency with these criteria. The primary goals of the 2017 Clean Air Plan are to:

1. Protect air quality and health at the regional and local scale; and
2. Protect the climate.

A project that would not support these goals would not be considered consistent with the 2017 Clean Air Plan. On an individual project basis, consistency with BAAQMD quantitative thresholds is interpreted as demonstrating support for the 2017 Clean Air Plan goals. As shown in the response to impact *b* and *c*, with implementation of BMPs the proposed project would not result in exceedances of BAAQMD 2017 thresholds for criteria air pollutants and thus would not conflict with the 2017 Plan's goal to attain air quality standards.

Therefore, consistent with the BAAQMD's CEQA thresholds, the proposed project would not conflict with or obstruct the implementation of the 2017 Clean Air Plan. Impacts would be less than significant, and no mitigation would be required.

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

Less than Significant Impact. Project construction would generate criteria air pollutant emissions. The construction activities listed in Table 1 in the Project Description were combined into four main construction activities: site preparation, grading, trenching, and paving. These phases were modeled for the proposed project and would have the potential to generate fugitive dust (PM_{2.5} and PM₁₀) through the exposure of soils to wind erosion and dust entrainment. Exhaust emissions associated with heavy construction equipment would also occur. Equipment as listed in Table 1 under the Project Description was entered into the CalEEMod model to estimate project construction emissions.

As shown in Table 4, the proposed project would not exceed BAAQMD thresholds for criteria pollutants. Therefore, construction impacts related to criteria air pollutant emissions would be less than significant, and no mitigation is required.

Table 4. Estimated Project's Daily Construction Emissions

	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Average Daily Construction Emissions (lbs./day)	0.39	3.4	3.6	<1	<1	<1
BAAQMD Thresholds	54	54	N/A	N/A	82	54
Threshold Exceeded?	No	No	N/A	N/A	No	No

ROG = reactive organic gases, NO_x = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter or less, PM_{2.5} = particulate matter 2.5 microns or less in diameter; lbs./day = pounds per day, BAAQMD = Bay Area Air Quality Management District

N/A = Not available. The BAAQMD has not established recommended quantitative thresholds for CO and SO₂.

Notes: All emissions modeling was completed using CalEEMod in accordance with applicant-provided information and data. See Appendix A for model output results.

The 2017 Clean Air Plan control strategy includes mobile-source control measures to be implemented through incentive programs and other activities; and transportation control measures to be implemented through transportation programs in cooperation with the Metropolitan Transportation Commission (MTC), local governments, transit agencies, and others. The 2017 Clean Air Plan also represents the Bay Area's most recent triennial assessment of the region's strategy to attain the state one-hour ozone standard.

Fugitive Dust

Site preparation and grading may cause wind-blown dust that could contribute particulate matter to the local atmosphere. The BAAQMD has not established a quantitative threshold for fugitive dust emissions but rather states that projects that incorporate best management practices (BMP) for fugitive dust control during construction, such as watering exposed surfaces and limiting vehicle speeds to 15 miles per hour, would have a less than significant impact related to fugitive dust emissions.

The Project Description commits the County and the contractor to fulfill the BAAQMD's proposed BMPs during construction phase. The dust control BMPs committed to in the project description will be incorporated into the project CMP.

Implementation of the construction BMPs for fugitive dust control identified in the project description would reduce air quality impacts to a less than significant level. Impacts are less than significant, and no mitigation would be required.

c) *Expose sensitive receptors to substantial pollutant concentrations?*

Less than Significant Impact. As described above, the nearest sensitive receptor is one single-family residence in the northeast corner of the project site. The next closest residences are over 500 feet from the project site and other sensitive receptors (schools, healthcare facilities, parks, etc.) are located about 0.5 mile from the project site.

Carbon Monoxide Hotspots

Less than Significant Impact. As identified in the BAAQMD 2017 CEQA Guidelines, a project would result in a less than significant impact related to CO concentrations if it is consistent with an applicable congestion management program; would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; and would not increase traffic volumes at

affected intersections more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

The busiest intersection identified in the surrounding area is the Santa Rosa Avenue and Todd Road intersection about 2,600 feet to the east of the project site. Based on information in the Traffic Management Technical Memorandum (TJKM 2020), traffic volumes scenario at the Santa Rosa Avenue and Todd Road would be 3,053 vehicles in 2021 traveling through the intersection in the p.m. peak hour (4:00 to 6:00) (which represents a higher volume of traffic than at the Todd Road and Standish Avenue intersection (1,205 in the p.m. peak hour). Even as such, this traffic volume is substantially below the 44,000 vehicle per hour threshold described above; in addition, the proposed project does not add capacity nor would it provide new access that may result in generating new vehicle trips. Therefore, the proposed project would not result in individually or cumulatively significant impacts from CO emissions, and impacts would be less than significant, and no mitigation is required.

Toxic Air Contaminants

Less than Significant Impact. A toxic air contaminant (TAC) is defined by California law as an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. Certain population groups, such as children, older adults, and people with health problems, are particularly sensitive to air pollution. Construction-related activities would result in short-term emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation (e.g., excavation, grading, and clearing) and paving. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM, as discussed below, outweighs the potential non-cancer¹ health impacts (CARB 2020).

Generation of DPM from construction typically occurs in a single area for a short period. Construction of the project would occur over approximately 40 to 50 days and would cease when construction is completed. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the development (OEHHA 2015).

The maximum PM_{2.5} emissions, which is used to represent DPM emissions for this analysis, would occur during site preparation and grading activities. While site preparation and grading emissions represent the worst-case condition, such activities would only occur for 40 to 50 days. A construction period of this length would represent a small percentage of the typical health risk calculation periods. Therefore, DPM generated by construction of the project would not create conditions where the probability that the maximally exposed individual would contract cancer is greater than 10 in one million or to generate ground-level concentrations of noncarcinogenic TACs that exceed a hazard index greater than one for the maximally exposed individual. Impacts would be less than significant, and no mitigation required.

¹ Non-cancer risks include premature death, hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function (CARB 2020).

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

Less Than Significant Impact. During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust both during normal use and when idling. However, these odors would be temporary and transitory and would cease upon completion. BAAQMD lists odor screening distances for land uses with the potential to generate substantial odor complaints. Those land uses include wastewater treatment plants, landfills or transfer stations, refineries, composting facilities, confined animal facilities, food manufacturing, smelting plants, and chemical plants, none of which are part of this project. The proposed project would not generate objectionable odors affecting a substantial number of people during operation. Project impacts are less than significant.

1.4 BIOLOGICAL RESOURCES

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

Methods

The biological resources section is based upon the Biological Resources Assessment (BRA) prepared for the proposed project by Rincon (Rincon 2021a, 2024). The BRA was prepared consistent with applicable federal, state, and local statutes and guidelines. The BRA included a review of relevant literature and background information followed by a reconnaissance-level biological resource site visit on December 1, 2020 to document site conditions and evaluate the potential for special-status species and other sensitive biological resources to occur on the project site.

Special-status species have been identified for the analysis as those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS under the ESA; those listed or candidates for listing as Rare, Threatened, or Endangered under the CESA or Native Plant Protection Act; those identified as Fully Protected by the California Fish and Game Code (Sections 3511, 4700, 5050, and 5515); those identified as Species of Special Concern or Watch List species by the CDFW; and plants occurring on lists 1 and 2 of the California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) system.

Setting

Vegetation and Other Land Cover Types

A majority of the 2.66 acre project site is developed (approximately 1.67 acre of developed land and approximately 0.61 acre of landscaped areas); the rest (approximately 0.38 acre) is natural vegetation or part of the designated ditch. Scattered trees, such as coast live and valley oak and other ornamental trees are growing along the roadside. Drainage ditches at the western end of the project site are bordered by ruderal vegetation. Trees also occur throughout the project site, individually or in low density, including coast live oak, valley oak, and red willow. The agricultural fields adjacent to the project site show evidence of mowing or disking.

Topography and Soils

The site's elevation ranges from approximately 99 to 105 feet (30 to 32 meters) above mean sea level and the topography of the site and its immediate surroundings are generally flat. Adjacent land uses include rural residential, industrial, commercial and undeveloped lands. The site is located on the Santa Rosa Plain valley floor. Based on the most recent Natural Resources Conservation Service soil survey for Sonoma County (USDA 2020a), the study area contains one soil map unit: Wright loam, shallow, wet, 0 to 2 percent slopes: a deep, somewhat poorly drained soil that occurs on gently undulating or hummocky low terraces. It is formed in alluvium from mixed sources. A typical soil profile consists of loam to 15 inches, sandy clay loam to 25 inches, and clay to 98 inches. with several layers of clay loam and sandy clay loam from 5 to 55 inches, and gravelly clay from 55 to 60 inches. Soil layers vary from neutral to medium acidity. This soil type is well drained and is included on the hydric soils list (USDA 2020b).

Impact Analysis

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

Less than Significant Impact with Mitigation. The species evaluation completed by Rincon concluded that one special-status plant species, three special-status wildlife species, and birds of prey and migratory birds protected under the Migratory Bird Treaty Act (MBTA) have the potential (very low) to occur within the project site. Appendix B includes the complete listing of special status plants and wildlife and the determination of the potential for each to occur in the study area. The findings concerning the special-status plants and wildlife in the project site are summarized below.

Special-Status Plants

Less than Significant Impact with Mitigation. The project site provides marginal habitat for congested-headed hayfield tarplant (*Hemizonia congesta* ssp. *congesta*). Congested-headed hayfield tarplant is not federal or state listed but has a CNPS CRPR of 1B.2. Congested-headed hayfield tarplant is known to inhabit valley and foothill grassland habitats and has been recorded along roadsides in this habitat type. Approximately 0.38 acre of the project site is occupied by ruderal habitat dominated by non-native annual grasses including wild oat (*Avena* sp.), barley (*Hordeum* sp.), brome grass (*Bromus* sp.), and other weedy herbaceous species (Rincon 2021). There are two historic occurrence of congested-headed hayfield tarplant within 5 miles of the project site (Rincon 2021). The 2020 reconnaissance survey of the project site was conducted outside the evident and identifiable period of congested-headed hayfield tarplant. The proposed project has potential to result in direct impacts to congested-headed hayfield tarplant if present in the disturbance footprint due to removal of individuals or crushing by heavy equipment. Removal of congested-headed hayfield tarplant would be considered a significant impact. Implementation of mitigation measure BIO-1 will reduce potential impacts to less than significant.

Mitigation Measure

BIO-1 Congested-headed hayfield tarplant

- A properly timed survey for special status plant including congested-headed hayfield tarplant will be conducted prior to initial construction activities. The survey will be conducted in accordance with standard survey protocols (CDFW 2018; CNPS 2001), as applicable.
- If no sensitive plant species are detected during the botanical survey, no further avoidance and minimization efforts are required.
- If special status plant species are identified, they will be included in an Environmentally Sensitive Area non-disturbance buffer, which will be determined by a qualified botanist. The plant(s) will be clearly delineated using high-visibility orange fencing, which will be installed prior to initial vegetation clearing. Vehicles will not be allowed to park in, nor will equipment be stored in, the Environmentally Sensitive Area, nor will oil, gasoline, or other substances storage be permitted. No vegetation removal or ground-disturbing activities will be permitted in the Environmentally Sensitive Area. The Environmentally Sensitive Area fencing will remain in place throughout the duration of project construction and will be regularly inspected and fully maintained.
- If rare plant populations cannot be protected in place, the County or its designee will prepare a transplantation/propagation plan for the relocation of the rare plant(s). Rare plant relocation will occur in a suitable area of the project area. The transplantation/propagation plan will be sent to CDFW.

Special-Status Wildlife

Special-status wildlife species evaluated in this document include California tiger salamander (*Ambystoma californiense*, CTS), northwestern pond turtle (*Actinemys marmorata*, NWPT), monarch butterfly (*Danaus plexippus*), Cooper's hawk (*Accipiter cooperii*), and birds of prey and migratory birds protected under the MBTA. Potential impacts for these species and native birds with potential to occur within the project site are discussed below.

California Tiger Salamander

Less than Significant Impact. The Sonoma County distinct population segment of CTS is federal listed as endangered with designated critical habitat and is a California state listed threatened species. The Project area does not provide suitable breeding habitat for this species. It is possible this species could move through the drainage ditches within the project site during migration from breeding areas to estivation areas outside the project limits or during dispersal.

The 2005 Santa Rosa Plain Conservation Strategy (Strategy) created a long-term conservation program to mitigate potential adverse effects on listed species including CTS. The Strategy provides avoidance, minimization, and mitigation options to facilitate project approval/ completions and protection of CTS. Figure 3 (Santa Rosa Plain Conservation Strategy Map) of the Strategy indicates that the parcels immediately north and west of Todd Road are identified as areas of future development or as already developed 'no potential for impact'. Per Figure 3 (Strategy Map) the parcels south of Todd Road in the project limits are identified as future development, already developed 'no potential for impact' or as CTS conservation area. Several of the parcels in the project limits are identified on Figure 3 (Strategy Map) as areas within 1.3 miles of known breeding (for CTS).

Per Strategy section 5.3.3.4 (Mitigation for Linear Projects) '*Certain projects are not expected to impact CTS and would not be required to mitigate, as long as the direct and indirect activities do not impact CTS. Examples of these projects could include repaving and other in-kind replacement of hardscape, paving of existing compacted road shoulders for pedestrian use, and installation or*

replacement of underground utilities where those utilities are under existing hardscape. These projects will not include construction of curbs or other barriers to CTS dispersal.’ Per Strategy section 5.3.3.4.1 (Roads) ‘Road projects that would not impact existing CTS or listed plant habitat (i.e., signage, signalization without widening, vertical and horizontal curve adjustments without widening or disturbance to the hydrology of the surrounding area) would not be required to mitigate.’

The proposed project would involve roadway excavation at the intersection to connect power to the new traffic signal mast arms and new drainage inlets to connect with the existing and/or relocated storm drain lines. The Project does not include pavement widening activities and will not alter the exiting drainage ditches within the project site.

There are three locations in the project footprint where project construction would occur in unpaved areas. Two locations are north of Todd Road, and one is south of Todd Road. Approximately 85 linear feet of sidewalk will be installed in the in the previously disturbed/compacted area immediately west of the northeast quadrant of the intersection. In the second area, located at the northwest quadrant of the intersection, the existing curb ramp will be replaced to meet current standards. This area is currently covered in concrete and landscaping plants (dense English ivy) and boulders. The third location is along the south side of Todd Road where the shifted Ghilotii Avenue will enter the intersection. Project improvements would impact the dirt/gravel road shoulder at this location.

The project is the signalization of an existing intersection without pavement widening and would not impact CTS habitat. In accordance with the Strategy projects that would not impact existing CTS would not be required to mitigate.

The Project has committed to implementing best management practices (BMPs) as part of construction to minimize and/or avoid potential impacts during construction. The installation of silt fencing between the construction footprint and drainage ditches will prevent construction impacts to ditches and adjacent uplands. The BMPs committed to in the project description will be incorporated into the project CMP. Implementation of the construction BMPs identified in the project description would further reduce potential impacts. Project impacts are less than significant.

Northwestern Pond Turtle

Less Than Significant Impact. NWPT is a federal proposed threatened species and is a state species of special-concern. NWPT is found in ponds, rivers, streams, and irrigation ditches with aquatic vegetation; and within suitable adjacent grasslands for egg laying within 0.33 mile of water. The closest CNDDDB record for this species was from 2004, and occurs 1.65 miles southwest of the project site, on the east side of Highway 101. The closest body of water that may provide marginally suitable aquatic habitat is the canal that runs north-south, 400 feet (0.12 km) to the east of the project boundary. This canal has steep sides reinforced with rock to the north of Todd road and vertical concrete sides to the south of Todd Road. SMART rail tracks run parallel to the canal to its west, creating a barrier to movement, thus it is unlikely that pond turtles will cross the tracks from this canal and enter the project site. Aerial maps show recently constructed ponds (between 2019 and 2020) 0.25-mile to the northwest of the study area in undeveloped grasslands. It cannot be definitively determined if these ponds constitute a permanent waterbody, if they do, it may increase the likelihood for western pond turtles to occur in the vicinity. Although suitable habitat is not present within the site, ruderal fields to the south and west of the project site may provide suitable upland habitat for egg laying. Due to the presence of suitable grassland and potential pond habitat adjacent to the study area, there is a very low potential for western pond turtle to occur within the project site. It is possible that NWPT may move through the drainage ditches within the project site.

The project does not alter the exiting drainage ditches within the project site. The project has

committed to implementing best management practices (BMPs) as part of construction to minimize and/or avoid potential impacts during construction. The installation of silt fencing between the construction footprint and drainage ditches will prevent construction impacts to ditches and adjacent uplands. The BMPs committed to in the project description will be incorporated into the project CMP. Implementation of the other construction BMPs identified in the project description would further reduce potential impacts. Project impacts are less than significant.

Monarch Butterfly

Less than Significant Impact with Mitigation. The monarch butterfly is a candidate for federal listing and is not State listed. Monarch habitat includes breeding, migratory, and overwintering habitats. Breeding habitat essentially features native milkweeds to provide food for larvae and other flowers to provide nectar for adults but may also include trees or shrubs for shading and roosting (Western Association of Fish and Wildlife Agencies 2019). Western monarchs overwinter at sites primarily along 620 miles of the Pacific coast from Mendocino County, California to Baja California, Mexico. Most of the California coastal overwintering sites are within 1.5 miles of the Pacific Ocean or San Francisco Bay (Xerces Society et al. 2024a). Monarch butterfly is found throughout most of California in open habitats that support milkweed (*Asclepias* spp.) and nectar plants, including grasslands, fields, meadows, chaparral, coastal scrub, weedy areas, marshes, and roadsides. Adult monarch butterflies during breeding and migration require a diversity of blooming nectar resources, which they feed on throughout their migration routes and breeding grounds (spring through fall). Monarchs need milkweed (primarily *Asclepias* spp.) for both oviposition and larval feeding, embedded within this diverse nectaring habitat (USFWS 2020). Adult females lay eggs singly on milkweed species which the caterpillars rely upon for energy and protective toxins called cardenolides. Milkweeds are critical for successful development of the caterpillar into an adult butterfly (Xerces Society et al. 2024a).

A query of the Western Monarch Milkweed Mapper database was conducted to determine known observations of monarch in the Project vicinity (Xerces Society et al. 2024b). There are no records for breeding monarch butterfly within 4 miles of the Project area. There is one record from 2017 of an adult monarch (non-breeding) sited approximately 1.36 miles southeast of the Project area (Xerces Society et al. 2024b).

Overwintering habitat does not occur in the Project area. The ruderal habitat in the project site would not be expected to support substantial amounts of milkweed plants to serve as breeding habitat. Some plants observed in the Project area may provide nectaring opportunities for migrating monarchs (if present). While unlikely, it is possible milkweed species suitable as breeding habitat for monarch butterfly could colonize the Project area prior to the start of construction.

Given that the majority of the project activities will occur in paved areas, limited clearing and grubbing of vegetation to prepare the site for construction would temporarily disturb nectaring habitat. As noted in the project description, all disturbed areas that would result in exposed soil would be revegetated with native grass/ herb species. If present, individuals could be harassed, injured, or killed by collision with construction equipment or the removal of milkweed plants if occupied by monarch butterfly eggs. Take of monarch butterfly would be a significant impact. With the implementation of Mitigation Measure BIO-2, impacts will be reduced to less than significant.

Mitigation Measure

BIO-2 Monarch butterfly

- A qualified biologist will conduct a survey for milkweed species (monarch breeding host plant) in areas to be used for construction and staging as well as a 20 ft buffer (if accessible). If no milkweed species are detected, then no further avoidance or minimization is needed.

- If milkweed weed species are identified they will be mapped and inspected for the presence of monarch butterfly eggs, larvae, and chrysalides (pupa, protective covering). If no monarch butterfly eggs, larvae, or chrysalides are found on the milkweed, then no further avoidance or minimization is needed.
- If monarch butterfly eggs, larvae, and chrysalides are found a minimum 10 foot radius avoidance buffer will be established around the occupied plant with flagging and or temporary fencing. The avoidance buffer will remain in place until such time as the qualified biologist determines that eggs, larvae, and or chrysalides are no longer occupying the plant(s) of USFWS has provide further direction.

Cooper's hawk & Nesting Birds and Raptors

Less than Significant Impact with Mitigation. Trees in the project limits provide potential nesting habitat for special-status raptors such as the Cooper's hawk, and other native birds protected by the Migratory Bird Treaty Act (MBTA) and CFGC Section 3503. Impacts would occur through removal of trees and vegetation if active nests are present. Impacts would also occur if active nests are present in undeveloped and landscaped areas adjacent to active construction or staging through disturbance and nest abandonment. With the implementation of Mitigation Measure BIO-3, impacts to nesting birds would be reduced to less than significant level.

Mitigation Measure

BIO-3 Cooper's hawk & Nesting Birds and Raptors

To avoid disturbance of nesting and special-status birds including raptorial species protected by the MBTA and Sections 3503, 3503.5, and 3513 of the CFGC, activities related to the proposed project, including, but not limited to, vegetation removal, ground disturbance, and construction shall occur outside of the bird breeding season. For construction activities occurring during the nesting season (generally February 1 to August 31), surveys for nesting birds covered by the MBTA and CFGC shall be conducted by a qualified biologist no more than 14 days prior to initiation of construction activities for the intersection improvements, including construction staging and vegetation removal. The surveys shall include the entire disturbance areas plus a 200-foot buffer around any disturbance areas. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The biologist shall have full discretion for establishing a suitable buffer. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed, and young have fledged the nest prior to removal of the buffer.

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

No Impact. There are no CDFW-listed sensitive natural communities or riparian habitats present within the project site. Therefore, no impacts to sensitive natural communities would occur. Critical habitat for CTS overlaps within the larger study area; however, with implementation of Sonoma County construction BMPs committed to in the project description impacts to CTS would be avoided, as discussed above under a). No impact would occur.

- 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?*

No Impact. The drainage ditches drain from upland (higher ground) areas and are not adjacent to

flow into a body of water such as into a river, canal or lake; therefore, these features are unlikely to be under USACE or CDFW jurisdiction. The drainage ditches may be considered waters of the State and fall under the jurisdiction of the Regional Water Quality Control Board (RWQCB) under the Porter-Cologne Act. This would result in impacts requiring a Waste Discharge Requirements permit. No construction activities would occur within the drainage ditches consistent with NPDES general permit by the State of California, and silt fencing would be installed at the project boundary perimeters as part of the BMPs committed to in the project description and implemented as part of the proposed project to avoid impacts to the ditches. No impact would occur.

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

Less than Significant Impact. No significant wildlife movement corridors or habitat linkages are present in the study area. Due to the relatively small size of the project footprint, and its location in existing development, the proposed project would not interfere substantially with the movement of wildlife species. Project impacts would be less than significant and not mitigation is required. occur.

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

No Impact. The project site is located in Sonoma County and is subject to the Sonoma County General Plan and County Ordinances. Chapter 26D of the Sonoma County Code, Sonoma County Heritage or Landmark Tree Ordinance, identifies policies for protected tree species in Sonoma County. Valley Oak trees are planted along the roadside within the project site. No removal of these trees is expected to occur. However, if any of the trees proposed for removal have been designated as heritage and/or landmark trees, a tree permit would be required to be obtained prior to removal. The project site is also covered under the Santa Rosa Conservation Strategy's CTS Conservation Area. The project limits, where construction would occur, does not support CTS habitat; therefore, no impacts to CTS and no conflicts with local policies or ordinances protecting biological resources would occur.

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

No Impact. The Santa Rosa Conservation Strategy requires mitigation for projects within 1.3 miles of known CTS breeding sites. The study area used for the biological resources analysis is within 1.3 miles of known breeding sites; however, the project limits, where construction would occur, does not support CTS. Therefore, no conflicts with State, regional, or local habitat conservation plans. No impact would occur.

1.5 CULTURAL RESOURCES

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

Setting

The project site is located in a low-density industrial, light manufacturing, and residential use area in an unincorporated portion of Sonoma County. The project site is centered on the intersection of Todd Road at Standish Avenue and a small portion of a private driveway known as Ghilotti Avenue. The project site is surrounded by a meat and food service distributor to the northwest, a residential property to the northeast, and a construction contractor and vacant land to the south.

A Cultural Resources Assessment (CRA) prepared by Rincon Consultants, Inc. included a cultural resources records search, Sacred Lands File (SLF) search, and field survey for the proposed project (Rincon 2021b). Rincon Consultants, Inc. conducted a pedestrian field survey of the project site for cultural resources. Areas of exposed ground were inspected for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), ecofacts (marine shell and bone), soil discoloration that might indicate the presence of a cultural midden, soil depressions, and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations) or historic debris (e.g., metal, glass, ceramics) (Rincon 2021b). No cultural resources were observed in the project area during the pedestrian field survey (Rincon 2021b).

The properties at the northwest and southeast corners of the intersection of Todd Road and Standish Avenue are less than 45 years old. The property at the northeast corner of the intersection contains a residential building constructed in 1927; however, no physical alterations are proposed to the property or to the building, and no acquisition of property would occur as part of the project. Therefore, evaluation of the building is not warranted.

Impact Analysis

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

No Impact. The California Historical Resources Information System (CHRIS) records search conducted for the proposed project identified three built environment resources recorded within a 0.5-mile radius, none of which are directly in the project site. Construction on the project site would occur on three properties located on the south side of Todd Road and at the northwest corner of the intersection, but none of these properties are over 45 years of age. The property at the northeast corner of the intersection contains a residential building over 45 years of age; however, no physical alterations are proposed to the property as part of the project. In addition, no other properties were formally recorded or evaluated as none of the properties within the project site are

over 45 years old. Most of the project would include primarily low-scale sidewalk, curb and drainage inlet improvements and a traffic signal; these are consistent with the existing streetscape and would not result in considerable changes in setting or cause visual or auditory impacts to adjacent properties. No impact would occur.

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

Less than Significant Impact with Mitigation. The CHRIS records search did not identify any recorded archaeological sites within 0.5 mile radius of the project site. Results of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC) did not identify any cultural resources within the project site. No cultural resources were observed in the project area during the pedestrian field survey (Rincon 2021b). However, there is the potential for previously undiscovered archaeological resources to be encountered during construction. If archaeological resources are discovered during construction the impacts would be potentially significant. If archaeological resources are identified during construction, Mitigation Measure CUL-1 would be implemented. Impacts associated with the discovery of archaeological resources would be less than significant with the implementation of Mitigation Measure CUL-1.

- c) *Disturb any human remains, including those interred outside of dedicated cemeteries?*

Less than Significant Impact with Mitigation. Although no evidence of human remains was identified there the potential for human remains to be discovered during construction. If human remains are discovered the impact would be potentially significant. If human remains are identified during construction, Mitigation Measure CUL-1 would be implemented. Impacts associated with the discovery of human remains would be less than significant with the implementation of Mitigation Measure CUL-1.

Mitigation Measures

CUL-1

In the event of discovery of archeological resources and/or human remains within the project site, adherence to the following requirements shall be implemented to avoid disturbance or damage to archeological resources or human remains. The County of Sonoma Municipal Code (Chapter 11 as amended by Ordinance No. 6338) establishes the following County requirements for the protection of archaeological resources and human remains discovered during construction grading and drainage:

All work shall be halted in the vicinity of the find, the Director of Public Infrastructure or his or her authorized representative (director) shall be notified, and the following shall occur before work may be resumed:

- **Human Remains.** If human remains or suspected human remains are discovered, the permittee shall notify the county coroner and comply with all state law requirements, including Health and Safety Code section 7050.5 and Public Resources Code section 5097.98, to ensure proper disposition of the human remains or suspected human remains, including those identified to be Native American remains.
- **Archaeological Resources.** If archaeological resources or suspected archaeological resources are discovered, the director shall notify the State Historic Preservation Officer and the Northwest Information Center at Sonoma State University, and the permittee shall retain a qualified archeologist to evaluate the find to ensure proper disposition of the archaeological resources or suspected archaeological resources. All costs associated with the evaluation and mitigation of the find shall be the responsibility of the permittee. The director shall provide notice of the find to any tribes that have been identified as having cultural ties and affiliation with the geographic area in which the archaeological resources or suspected archaeological resources were discovered if the tribe or tribes have requested notice and provided a contact person and current address to which the notice is to be sent. The director shall consult with and solicit comments from notified tribes to aid in the

evaluation, protection, and proper disposition of the archaeological resources or suspected archaeological resources. The need for confidentiality of information concerning the archaeological resources or suspected archaeological resources shall be recognized by all parties. For the purposes of this section, archaeological resources include historic or prehistoric ruins, burial grounds, pottery, arrowheads, midden, or culturally modified soil deposits. Artifacts associated with prehistoric ruins include humanly modified stone, shell, bone, or other cultural materials such as charcoal, ash, and burned rock indicative of food procurement or processing activities. Prehistoric domestic features include hearths, fire pits, or floor depressions; mortuary features are typically represented by human skeletal remains. (Ord. No. 6338, Exhibit B (12-15-2020))

If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD has 48 hours to make recommendations for the disposition of the remains. The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance.

1.6 ENERGY

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

Setting

The purpose of the proposed project is to improve the intersection of Todd Road at Standish Avenue to meet current Sonoma County standards and signalize the intersection to facilitate current and projected traffic movements including large truck traffic. This is consistent with the objective of avoiding wasteful and inefficient use of energy resources attributed to long delays at this intersection.

Impact Analysis

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

Less than Significant Impact. Construction equipment would consume energy associated with the movement of equipment and materials. The proposed project would comply with local, state, and federal regulations related to (limiting engine idle times, recycle construction debris) which would minimize wasteful or inefficient use of energy. Overall construction duration is only expected to last 40 to 50 days and energy consumption associated with construction would end after completed. Operation of the proposed project would result in avoiding wasteful and inefficient use of energy resources attributed to long delays at this intersection by improving the balance of traffic movements at this intersection. Impacts would be less than significant, and no mitigation measures are required.

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

No Impact. The Sonoma County Open Space & Resource Conservation Element of the General Plan includes goals and policies related to energy conservation and reduced energy demand, but these are not applicable to roadway projects. Regulations at the state level are intended to reduce energy use and greenhouse gas (GHG) emissions including California Code of Regulations Title 24, Part 6-Energy Code which are primarily related to the construction of buildings. The proposed project would not conflict with or obstruct a state or local plans related to renewable energy or energy efficiency because construction would comply with applicable regulations. No impact would occur.

1.7 GEOLOGY AND SOILS

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

Setting

The project site is located in southern Sonoma County in the Sonoma Valley. The Sonoma Valley runs north-south between the Sonoma Mountains on the west and the taller Mayacamas Mountains to the east. The San Pablo Bay and associated wetlands bound the County to the south. The Pacific Ocean forms the western county boundary, including an interesting assemblage of steep hills, marine terraces, beaches, and offshore sea stacks. The San Andreas Fault trends along the western margin of the County. In addition to the San Andreas Fault, the Healdsburg, Rodgers Creek, and Mayacamas faults are located within the County and are all considered active faults. The project site is not located within a State-designated Alquist-Priolo Earthquake Fault Zone (California Department of Conservation 1983).

Soil types in this region of Sonoma County and Santa Rosa sphere of influence can vary from bedrock uplands to alluvial flatlands (Santa Rosa 2009). According to the current USGS Geologic Map (Preliminary geologic map of the eastern Sonoma County and western Napa County, 1973), the project site is underlain by alluvial fan deposits bordering uplands.

Impact Analysis

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:
- i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)*
No Impact. There are no known active faults at the project site and the site is not within a designated Alquist-Priolo Earthquake Fault Zone (DOC 2021). The closest fault considered to be active is the Rodgers Creek fault zone located approximately three miles to the east. Therefore, there is no risk of fault rupture at the project site as the project site is not within a known area that is susceptible to strong seismic ground shaking. There would be no impact.
 - ii. *Strong seismic ground shaking?*
No Impact. See response above under a)i.
 - iii. *Seismic-related ground failure, including liquefaction?*
Less than Significant Impact. Liquefaction is defined as the sudden loss of soil strength due to a rapid increase in soil pore water pressure resulting from seismic ground shaking. According to Figure 2.7-3 of Association of Bay Area Governments Liquefaction Map, the project site is located in an area of Medium Liquefaction Susceptibility (ABAG 2017). Susceptibility levels of High and Very High indicate a greater chance of a project to directly or indirectly cause the risk of loss, injury, or death related to liquefaction. Therefore, impacts would be less than significant and no mitigation is required.
 - iv. *Landslides?*
No Impact. The project site is within a seismically active area in Northern California. However, the potential for a seismic-related ground failure from landslides would be low due to the relatively flat terrain of the project site and surrounding areas. No known landslides have occurred in the area as there is low potential for ground shaking. No impact.
- b) *Result in substantial soil erosion or the loss of topsoil?*
Less than Significant Impact. The project site is developed and generally level, which limits the potential for substantial soil erosion. Grading and excavation, when soils are exposed, present a potential for erosion. In accordance with the construction best management practices presented in the project description the project will prepare and implement an approved Stormwater Pollution Prevention Plan (SWPPP) and all exposed soil areas within the construction area would be seeded with native-grass/ herb seed following construction. Impacts would be less than significant, and no mitigation is required.
- 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?*
No Impact. The project site is not located within an area where the soils are unstable or could become unstable as a result of the proposed project. See responses to a) i to iv above. Construction activities would occur in areas previously affected by roadway construction. No impact would occur.
- d) *Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?*
Less than Significant Impact. Expansive soils can change dramatically in volume depending on moisture content. When wet, these soils expand; conversely, when dry, they contract or shrink. Sources of moisture that can trigger this shrink-swell phenomenon include seasonal rainfall, landscape irrigation, utility leakage, and/or perched groundwater. The proposed project would improve existing roadway infrastructure along Todd Road and Standish Avenue. All proposed

improvements would be required to be upgraded according to applicable Sonoma County Standards. The project site is located within an urban, built-up area surrounded by other industrial uses, it is not within an area prone to soil erosion or unstable soil, on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. There are two parcels on the south side of Todd Road and to the west (304 and 306 Todd Road) identified by the National Resources Conservation Service (NRCS) as having expansive soils (USDA 2021). The proposed project would not extend into these parcels. Impacts related to soil erosion, landslide, lateral spreading, subsidence, liquefaction, or collapse, or expansive soils would be less than significant and therefore no mitigation beyond the required National Pollution Discharge Elimination System (NPDES) permit is needed.

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

No Impact. The proposed project does not involve septic tanks or alternative wastewater disposal systems. No impact would occur.

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

Less than Significant Impact with Mitigation. The project site is located in an area associated with older alluvium of the Pleistocene age (USGS 2002) which has the potential for paleontological resources. However, no known paleontological resources have been identified in the project site or the surrounding area. Additionally, project construction activities would occur primarily within areas that have been previously disturbed for roadway construction and installation of utilities which would have likely unearthed or disturbed a unique paleontological resource or site or unique geologic feature. Construction would include excavation at depths up to approximately 10 feet for installation of the signal pole and 4 to 5 feet for stormwater improvements. Construction would export approximately 125 cubic yards of soil with most soils expected to be reused during construction. Given the small disturbance area, shallow depth of ground disturbance, and the previously disturbed condition of the project site, it is highly unlikely that previously unknown paleontological resources would be encountered during construction activities. However, ground disturbing activities always involve the possibility of such a discovery. Therefore, this impact is potentially significant, but with the implementation of GEO-1, the proposed project would result in a less than significant impact.

Mitigation Measures

GEO-1

In the event a previously unknown fossil is uncovered during project construction, all work shall cease until a certified paleontologist can investigate the find and make appropriate recommendations. The qualified paleontologist shall determine the significance of the discovery and identify whether additional mitigation or treatment is warranted. Measures may include testing, data recovery, reburial, archival review and/or transfer to the appropriate museum or educational institution. All testing, data recovery, reburial, archival review or transfer to research institutions related to monitoring discoveries shall be determined by the qualified paleontologist and shall be reported to the County. Work in the area of the discovery will resume once the find is properly documented and authorization is given to resume construction work.

1.8 GREENHOUSE GAS EMISSIONS

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

Methods

The analysis in this section is based in part on modeling using CalEEMod Version 2022.1.1.24; modeling outputs are included in Appendix A. In the 2017 BAAQMD *CEQA Air Quality Guidelines*, the BAAQMD outlines an approach to determine the significance of projects. For residential, commercial, industrial, and public land use development projects, the thresholds of significance for operational-related GHG emissions are as follows:

- Compliance with a qualified GHG reduction strategy
- Annual emissions less than 1,100 metric tons (MT) of carbon dioxide equivalent (CO₂e) per year (MT CO₂e/yr)
- Service person threshold of 4.6 MT CO₂e/service person/year (residents + employees)

For this analysis, the GHG emissions thresholds contained in the BAAQMD's May 2017 *CEQA Air Quality Guidelines* are the appropriate thresholds to use, specifically the annual emissions of 1,100 MT CO₂e/yr. This threshold has been reduced by 40 percent, to 660 MT CO₂e/yr, for consistency with the SB 32 goal of a 40 percent reduction in GHG emissions from 1990 levels by 2030. BAAQMD guidelines have set this threshold as a numeric emissions level below which a project's contribution to global climate change would be less than significant.

Setting

Project construction would generate greenhouse gas (GHG) emissions through the burning of fossil fuels or other emissions of GHGs, thus potentially contributing to cumulative impacts related to climate change. In response to an increase in man-made GHG concentrations over the past 150 years, California has implemented AB 32, the "California Global Warming Solutions Act of 2006." AB 32 codifies the Statewide goal of reducing emissions to 1990 levels by 2020 (essentially a 15% reduction below 2005 emission levels) and the adoption of regulations to require reporting and verification of statewide GHG emissions. Furthermore, on September 8, 2016, the governor signed Senate Bill 32 (SB 32) into law, which requires the State to further reduce GHGs to 40 percent below 1990 levels by 2030. SB 32 extends AB 32, directing the California Air Resources Board (ARB) to ensure that GHGs are reduced to 40 percent below the 1990 level by 2030.

On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with a statewide per capita goal of six metric tons (MT) CO₂e by 2030 and two MT CO₂e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects

because they include all emissions sectors in the State.

The vast majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project’s contribution towards an impact would be cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15064[h][1]).

Sonoma County Community Climate Action Plan

The Sonoma County Community Climate Action Plan (CCAP) was prepared by the Sonoma County Regional Climate Protection Authority, on behalf of the City of Sonoma, Sonoma County, and other incorporated cities and towns in the county. The CCAP provides goals and associated measures in the sectors of building energy, transportation and land use, solid waste, water and wastewater, livestock and fertilizer, and advanced climate initiatives.

Impact Analysis

- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

Less than Significant Impact. GHG emissions for the construction phase of the project were calculated using the CalEEMod Version 2022.1.1.24. The model calculates CO₂e annual maximum emissions for the project. Project construction would primarily generate GHG emissions from construction equipment operation, construction worker vehicle trips to and from the site, and from export of materials off-site. Construction input data for CalEEMod included anticipated start and finish dates of construction activity and inventories of construction equipment to be used. The analysis assessed maximum daily emissions from individual construction activities, including grubbing/land clearing, grading/excavation, drainage/utilities/sub-grade, and paving. Construction equipment estimates were provided by the project applicant. Construction activities associated with project construction would generate approximately 126 metric tons (MT) of CO₂e per year. Project GHG emissions would not exceed BAAQMD’s annual emissions significance threshold of 1,100 MT of CO₂e per year. Impacts would be less than significant, and no mitigation is required.

GHG emissions for the operational phase of the proposed project would not change as the improvements along Todd Road and Standish Avenue would not include the development of land uses such as housing or other buildings or other land uses that would increase traffic that generate additional GHGs. Impacts would be less than significant, and no mitigation is required.

- b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Less than Significant Impact. SB 32 requires GHG emissions to be reduced to 40 percent below 1990 levels by 2030. CARB’s 2017 Scoping Plan establishes goals and policies to meet this target. In 2016, the County approved a CCAP that identifies 20 goals to achieve or exceed an emissions reduction of 838,300 MT CO₂e. Table 5 provides applicable policies and an explanation of the project’s consistency with these policies.

Table 5. Consistency with Local GHG Reduction Plans

Applicable Goal, Policy, or Measure	Project Consistency
2017 Scoping Plan	
VMT Reduction Goals. Implement and support the use of VMT as the metric for determining transportation impacts under CEQA, in place of level of service (LOS).	Consistent. This IS provides an analysis of VMT in Section 1.17, <i>Transportation</i> . Since the proposed project would not result in an increase of employees or residents, there would be no change in the number of

Applicable Goal, Policy, or Measure	Project Consistency
	trips to or through the site, and no change in VMT associated with the proposed project
Sonoma County CCAP	
Goal 4: Reduce travel demand through focused growth.	Consistent. While the proposed project would modify the existing intersection, it would not result in an increase in vehicle trips or unanticipated growth.
Goal 11: Reduce Water Consumption.	Consistent. The proposed project would not include the construction or operation of water intensive uses.

As shown in Table 5, the proposed project would be consistent with the 2017 Scoping Plan and the Sonoma County CCAP adopted for the purpose of reducing GHG emissions. Impacts would be less than significant, and no mitigation is required.

1.9 HAZARDS AND HAZARDOUS MATERIALS

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

Setting

The project site is currently in use as Todd Road, Standish Avenue, and Ghilotti Avenue and portions of one northern adjoining property and two southern adjoining properties, which are developed with a parking lot and landscaped area associated with Lepe's Meat Company (APN 134-102-070), a walkway and landscaped area associated with Ghilotti Construction (APN 134-171-052), and vacant land (APN 134-171-049). Rincon Consultants, Inc. performed a reconnaissance of the project site on December 1, 2020. The purpose of the reconnaissance was to observe existing conditions and to obtain information indicating the presence of recognized environmental conditions (RECs) in connection with the project area. Information in this section is based on the Phase I Environmental Site Assessment prepared by Rincon Consultants, Inc. (Rincon 2021). Properties in the vicinity of the study area include commercial businesses, a construction storage yard, a gas station and auto repair, and single-family residences. A pole-mounted transformer was observed on the northeastern intersection of Todd Road and Standish Avenue. No RECs were observed in the vicinity of the transformer. In addition, a possible underground utility was observed on the north side of Todd Road adjacent to the east of the intersection of Todd Road and Standish Avenue. The current USGS topographic map (Santa Rosa Quadrangle, 2018) indicates that the study area is situated

at an elevation of approximately 100 feet above mean sea level with topography gently sloping down to the southwest. The adjacent areas consist of generally flat topography.

Impact Analysis

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

Less than Significant Impact. Project construction would involve the temporary transport, storage, and use of potentially hazardous materials including fuels, lubricating fluids, cleaners, and solvents. Heavy construction equipment would be used in project construction, the operation of which could result in a spill or accidental release of hazardous materials, including fuel, engine oil, engine coolant, and lubricants. If spilled, these substances could pose a risk to the environment and to human health. However, the transport, storage, use, or disposal of hazardous materials is subject to federal, state, and local regulations designed to reduce risks associated with hazardous materials, including potential risks associated with upset or accident conditions. Hazardous materials would be required to be transported under U.S. Department of Transportation (DOT) regulations (U.S. DOT Hazardous Materials Transport Act, 49 Code of Federal Regulations), which stipulate the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. In addition, the use, storage, and disposal of hazardous materials are regulated through the Resources Conservation and Recovery Act (RCRA). The California Department of Toxic Substances Control (DTSC) is responsible for implementing the RCRA program, as well as California's own hazardous waste laws. DTSC regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California. It does this primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law (California H&SC Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (Title 22, California Code of Regulations, Divisions 4 and 4.5). DTSC also oversees permitting, inspection, compliance, and corrective action programs to ensure that hazardous waste managers follow federal and State requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Compliance with existing regulations would reduce the risk of potential release of hazardous materials during construction. Therefore, potential for a hazard impact to occur during construction would be less than significant, and no mitigation is required.

The proposed project would not alter the daily use of the two roadways during operation and would not alter the existing use of the affected roads for routine transport, use, or disposal of hazardous materials or risk of upset or accident, and thereby would not result in a significant hazard to the public or the environment. There would be no impact in regard to operation of the intersection.

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

Less than Significant Impact with Mitigation. Rincon Consultants, Inc. performed a Phase I Environmental Site Assessment (ESA) in December 2020 for the project site in adherence to ASTM Practice E1527-13 (Rincon 2021). The Phase I ESA identified two recognized environmental conditions (RECs):

- Due to the age of the road (in use as early as 1916), elevated concentrations of lead may exist in the soil due to the historical use of leaded gasoline in motor vehicles from aerially deposited lead (ADL).
- The project site was historically used for agriculture. Agricultural land use is typically associated with the use of pesticides and arsenic.

Based on these conditions, project construction activities that disturb soils on-site could potentially result in the release of hazardous materials associated with agricultural chemicals and ADL into the environment. The Phase I ESA recommended that the site be further evaluated for these conditions

through taking soil samples prior to construction activities and that potential impacts for identified contaminants be mitigated through proper handling and disposal. Impacts related to the accidental release of hazardous materials into the environment would be potentially significant and mitigation is required. Implementation of HAZ-1, and if required HAZ-2 and HAZ-3, would reduce impacts to a less than significant level by requiring remediation if soil sampling levels are above State and local thresholds.

Mitigation Measures

HAZ-1 Phase II ESA

A Phase II ESA, conforming to the recommended guidelines established by the American Society for Testing and Materials in Standard E1903-11, shall be conducted prior to the start of project demolition and construction activities. The Phase II ESA shall include the collection of shallow soil samples to be analyzed for lead, organochlorine pesticides, and arsenic at the project site. The Phase II ESA shall provide recommendations to address identified hazards and indicate when to apply those recommended actions in relation to proposed project activities. As part of the Phase II ESA, analytical results will be screened against the North Coast Regional Water Quality Control Board environmental screening levels (ESL). These ESLs are risk-based screening levels for direct exposure of a construction workers.

If contaminants are detected at the project site, appropriate steps shall be undertaken to protect site workers during project construction and if necessary, the public during project operation. This would include the preparation of a Soil Management Plan (see Mitigation Measure HAZ-2).

If contaminants are detected at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24 Characteristics of Toxicity), appropriate steps shall be undertaken to protect site workers during project construction and if necessary, the public during project operation (see Mitigation Measure HAZ-3).

HAZ-2 Soil Management Plan for Impacted Soils

If impacted soils are present onsite, a Soil Management Plan (SMP) or equivalent document shall be prepared by a qualified environmental consultant to address onsite handling and management of soils and reduce hazards to construction workers and offsite receptors. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. These measures and practices may include, but not be limited to:

- Stockpile management including dust control, sampling, stormwater pollution prevention and the installation of BMPs
- Proper disposal procedures of contaminated materials
- Monitoring and reporting
- A health and safety plan for each contractor working at the site that addresses the safety and health hazards of each phase of site operations with the requirements and procedures for employee protection
- The health and safety plan will also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.

HAZ-3 Remediation

If soil present onsite contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), additional analytical testing will be required to determine the soil waste categorization. If analytical testing indicates that hazardous waste soils are present in the disturbed areas of the proposed project, the impacted soils shall be removed and disposed properly. Remediation of impacted soils may require additional delineation of impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and offsite disposal or recycling.

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

Less than Significant Impact with Mitigation. The nearest school is the New Directions School, located approximately 0.13 mile north of the project site. The proposed project would involve installation of a traffic signal, storm drain inlets, upgrade an existing sidewalk, and remove/replant trees and ornamental landscaping. As described above, construction activities may involve the use, storage, and transport of hazardous materials. However, given required compliance with the rules and regulations described above under items (a) and (b), impacts to schools would be less than significant with incorporation of mitigation measures HAZ-1 through HAZ-3. Impacts related to hazardous material use in proximity to schools would be less than significant with mitigation.

- 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?*

Less than Significant Impact with Mitigation. According to the Phase I ESA, there are no known hazardous materials within the project site. However, the nearest documented hazardous material cleanup site is on the adjacent property on the northern project boundary at 255 Todd Road. It is listed under various hazardous materials site databases (including Envirostor) according to the Phase I ESA (Rincon 2021). This site was identified as a potential REC (Rincon 2021). At 255 Todd Road, a release of hydrocarbons to a ‘well used for drinking water supply’ was reported in 2002. A domestic water well was sampled, and the case was closed in 2003. Based on the proximity of this site to the study area and the lack of information regarding the release, there is a potential for this property to be impacting the study area. Therefore, the northern adjacent release site at 255 Todd Road is considered a potential REC.

The properties at 3665 Standish Avenue and 260 Todd Road are hazardous material cleanup sites due to leaking underground storage tank sites (USTs). No other information regarding the location of the USTs was available in the Environmental Data Resources (EDR) report. No releases were reported regarding the USTs. However, an unreported release may have occurred and would impact the project area. Therefore, To reduce the impacts to workers during the construction phase of the proposed project, implementation of Mitigation Measure HAZ-1 to conduct soil sampling and remediate based on the results of a Phase II ESA would reduce impacts to a less than significant level.

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

No Impact. The project site is not located within two miles of a public airport or private airstrip or located in an airport land use plan. The nearest airport is the Santa Rosa Air Center which is located approximately 2.7 miles northwest of the project site. No safety hazard or excessive noise impacts would occur.

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

Less than Significant Impact. The proposed project would involve improvements to an existing intersection located at Todd Road and Standish Avenue in unincorporated Sonoma County near Highway 101 and Sonoma-Marin Area Rail Transit stations. The proposed project would maintain two lanes of traffic through construction to reduce the temporary construction traffic impacts. As committed to in the project description the County will prepare a Construction Management Plan (CMP) prior to construction. The CMP would be prepared consistent with Caltrans Standards Specifications and Standard Plans. The CMP would include construction sequence, traffic management plan, public outreach and notification plan and details on compliance with necessary

permits as well as avoidance, minimization, and mitigation measures. The CMP would include coordination with police and fire authorities to provide emergency vehicle and evacuation access during construction. The CMP would be submitted to and approved by Sonoma County Public Works in advance of notice to proceed construction. This plan would be consistent with the local emergency response plans by Sonoma County. In addition, the proposed project would improve overall intersection operations, including for emergency access and evacuation, after completion. Therefore, impacts to an adopted emergency response plan or emergency evacuation plan would be less than significant, and no mitigation would be required.

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

No Impact. The proposed project is located within an urbanized area of unincorporated Sonoma County and is not located within a Very High or High Severity Zone according to the CALFire California Fire Hazard Severity Zone map (CALFire 2020). In addition, the proposed project would not involve construction of new buildings or facilities that would be occupied by people. Therefore, the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. No impact would occur.

1.10 HYDROLOGY AND WATER QUALITY

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

Setting

The project site is generally flat and there are no waterbodies on or in close proximity to the project site. The nearest waterbody is a north-south canal located about 400 feet east of the project site. The canal has steep sides reinforced with rock to the north of Todd Road and vertical concrete sides to the south of Todd Road. Drainage ditches are located on the project site along portions of Todd Road and storm inlets and catch basins are located within both Todd Road and Standish Avenue that drains to the storm drain system. There are no 303(d) waterbodies located in the project site and the nearest is about 0.5 mile to the southeast (State Water Resources Control Board 2012).

Impact Analysis

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

Less than Significant Impact. The majority of the project site currently consists of impervious surfaces associated with the existing roadways. The proposed project includes the preparation of a SWPPP that includes measures to be implemented during construction related to erosion control, sediment control, non-stormwater management, and housekeeping BMPs to prevent substantial sediment and pollution movement from the project site and not violate water quality standards. There are no construction activities within the drainage ditches located within the project site on

Todd Road and construction would occur in the dry season. Construction would require excavation depths up to 10 feet for the installation of the signal mast and up to 5 feet for installation of stormwater elements. With the implementation of BMPs during construction no violations of water quality standards or water discharge requirements are anticipated. Impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. The proposed project would require water during construction for dust suppression. Water would originate from public service utility providers and not from a local well. The amount of water needed during construction would be minimal and water use would end once construction is complete, therefore the proposed project would not result in substantial decreases in groundwater supplies during construction. During operation, the proposed project would not interfere with groundwater recharge since the project site already consists largely of impervious surfaces and minor increase in impervious surfaces (approximately 0.1 acre) would be negligible compared to the overall size of the groundwater basin. Groundwater supplies and groundwater recharge would not be substantially impacted by construction and operation of the proposed project. Impacts would be less than significant, and no mitigation is required.

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

- i) *Result in substantial on- or offsite erosion or siltation;*

No Impact. The project site is relatively flat which minimizes the potential for erosion. The proposed project includes clearing and grubbing, excavation, and soil compaction. Stormwater BMPs would be implemented as part of the SWPPP to be prepared, as committed to in the project description. With implementation of stormwater BMPs construction activities would not result in substantial on- or offsite erosion or siltation. Operation of the proposed project would not result in changes over existing conditions and the existing project site is already largely impervious surfaces. No substantial on- or offsite erosion or siltation impacts would occur.

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

No Impact. The proposed project would result in a minor increase in impervious surfaces and relocation of stormwater facilities but does not result in a change in the existing drainage pattern of the project site. Stormwater flows would continue to be directed to the existing drainage ditches and the existing stormwater system. No substantial increases in the rate or amount of surface runoff impacts would occur.

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

No Impact. The proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. See responses to c) i and ii above. No impact would occur.

- iv) *Impede or redirect flood flows?*

No Impact. The project does not include structures that would impede or redirect flood flows. The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FEMA 2024) for project site and area around the project site are identified as Zone X, Area of Minimal Flood Hazard. No impact would occur.

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

No Impact. The proposed project would not result in the risk release of pollutants due to project inundation because the project site is not located within a flood hazard, tsunami, or seiche zone. As noted above, the project site is within an area identified by FEMA as an Area of Minimal Flood Hazard and there are no large waterbodies within or in close proximity to the project site. No impact would occur.

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

No Impact. The proposed project is primarily within existing transportation right-of-way and improves an existing intersection resulting in minor increase in impervious surfaces. Construction and operation would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impact would occur.

1.11 LAND USE AND PLANNING

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The project site is located within an urbanized area of unincorporated Sonoma County. Existing land uses within the project site include transportation related uses, industrial development, agricultural related uses, and one residential parcel. The project site is zoned for industrial and rural residential related uses.

Impact Analysis

a) *Physically divide an established community?*

No Impact. The proposed project is located primarily within existing transportation right of way and does not include elements that divide an established community. Construction would be short in duration and access would be maintained during construction. The purpose of the proposed project is to improve the intersection of Todd Road at Standish Avenue to meet current Sonoma County standards and signalize the intersection to facilitate current and projected traffic movements including large truck traffic. No impact would occur.

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

No Impact. The proposed project does not result in impacts due to a conflict with land use plans, policies or regulations. There would be no changes to existing zoning and no conflicts with existing Sonoma County plans, policies, or regulations. Information on consistency with the Sonoma General Plan are also addressed in Aesthetics (section 1.1), Biological Resources (section 1.4), Energy (section 1.6), Noise (section 1.13), and Transportation (section 1.17).

1.12 MINERAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The project site is located within an urbanized area of unincorporated Sonoma County. There are no Mineral Resource Zones (MRZ) identified by the California Department of Conservation, Division of Mines and Geology (CGS 2005) and there are no mineral extraction operations in or adjacent to the project site.

Impact Analysis

- 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?*

No Impact. The project site is not within areas identified as MRZs and would not result in the loss of availability of known mineral resource. No impact would occur.

- 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?*

No Impact. The project site is not within areas identified as MRZs and Sonoma County does not designate lands for mineral recovery in or adjacent to the project site. The proposed project would not result in the loss of availability of a locally important mineral resource recovery site. No impact would occur.

1.13 NOISE

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

Methods

A Construction Noise Assessment was prepared by Rincon Consultants, Inc. to determine the potential for construction noise and vibration impacts (Rincon 2021c). Sonoma County does not provide quantitative thresholds for construction noise sources. Therefore, to provide an analysis of potential construction noise impacts, Caltrans' quantitative standards are used for the analysis. Caltrans requirements relative to the allowable noise emission of construction equipment will be applied for this project. Caltrans Standard Specifications Section 14-8, "Noise and Vibration," sets construction noise thresholds to be applied at noise sensitive receivers. The Project will conform to Caltrans Standard Specification Sub-section 14-8.02 that states '*Do not exceed 86 dBA Lmax at 50 feet from the job site from 9:00 p.m. to 6:00 a.m.*' (Caltrans 2023).

The County's Guidelines for the Preparation of Noise Analysis outlines the methods and recommendations to use when preparing an acoustical analysis in Sonoma County (Sonoma County 2019). The guidelines build off the Sonoma County General Plan 2020 Noise Element and outlines the noise analysis process, criteria for requiring a noise analysis, noise analysis protocol, and noise management methodology. This analysis has been prepared in accordance with these guidelines. The guidelines state that temporary construction noise generally needs to be evaluated at a qualitative level, given its temporary nature; however, construction noise may be considered significant if it occurs in the early morning or evening hours and would then require a quantitative analysis.

To determine if construction activities would result in vibration impacts, construction vibration estimates are based on vibration levels reported by Caltrans and the Federal Transit Administration (FTA). Vibration limits used in this analysis to determine a potential impact to local land uses from construction activities, such as blasting, pile-driving, vibratory compaction, demolition, drilling, or excavation, are based on information contained in Caltrans' *Transportation and Construction Vibration Guidance Manual* and the Federal Transit Administration and the FTA *Transit Noise and Vibration Impact Assessment Manual* (Caltrans 2013b; FTA 2018).

The proposed project would not result in the generation of new vehicle trips or long-term operational noise and vibration sources. The proposed project involves signaling an intersection and does not include

widening of vehicle lanes or operation of on-site vibration sources, and therefore would not bring vehicles closer to residential properties than existing roadways or introduce new vibration sources to the project area. Therefore, no impacts from operational noise would occur and this issue is not analyzed further.

Setting

The most common source of noise in the project site vicinity is vehicular traffic from Todd Road, Standish Avenue, and, to a lesser extent, U.S. 101 traffic noise. Medium and heavy trucks were observed traveling on Todd Road from U.S. 101 on and off ramps accessing light industrial uses in the project vicinity while taking noise measurements. Commercial and industrial uses also contribute to the noise setting. The nearest sensitive receiver to the project site is one single-family residence located in the northeast corner of the Todd Road and Standish Avenue intersection. The single-family residential building’s facade is located about 55 feet from the existing centerline of Todd Road.

Impact Analysis

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

Less than Significant Impact with Mitigation. To characterize ambient sound levels at and near the project site, Rincon Consultants conducted three 15-minute sound level measurements on November 20, 2020 using an Extech 407780A Sound Level Meter. Noise Measurement (NM) 1 was conducted in the side yard area of the residence at 285 Todd Road and NM 1 represents the ambient noise level for the residential receiver; NM 2 was conducted south of Todd Road adjacent to the vacant property, which represents the ambient noise level for commercial receivers adjacent to the project site; and NM 3 represents the ambient noise level for the residential receiver located at 311 Todd Road. Table 6 summarizes the results of the noise measurements, and Table 7 shows the recorded traffic volumes from the noise measurements adjacent to Todd Road.

Table 6. Project Vicinity Sound Level Monitoring Results

Measurement Location	Measurement Location	Sample Times	Approximate Distance to Primary Noise Source	L _{eq} (dBA)	L _{min} (dBA)	L _{max} (dBA)
NM 1	North of Todd Road – side yard of 285 Todd Road residence	11:32 – 11:47 a.m.	Approximately 50 feet to centerline of Todd Road	72.0	52.5	85.6
NM 2	South of Todd Road – front yard of vacant property	10:52 – 11:07 a.m.	Approximately 50 feet to centerline of Todd Road	72.4	48.9	92.7
NM 3	North of Todd Road – front yard of 311 Todd Road residence	11:10 – 11:25 a.m.	Approximately 50 feet to centerline of Todd Road	72.4	42.6	91.4

Table 7. Sound Level Monitoring Traffic Counts

Measurement	Roadway	Traffic	Autos	Medium Trucks	Heavy Trucks
NM 1	Todd Road	15-minute count	157	16	17
		One-hour Equivalent	628	64	68
Percent			83%	8%	9%
NM 2	Todd Road	15-minute count	119	11	5
		One-hour Equivalent	476	44	20
Percent			88%	8%	4%
NM 3	Todd Road	15-minute count	95	7	1
		One-hour Equivalent	380	28	4
Percent			92%	7%	1%

Project construction would occur nearest to noise-sensitive uses located along Todd Road. Construction would occur adjacent to single-family residences (285 Todd Road and 311 Todd Road) and to an industrial use (246 Ghilotti Ave). Over the course of a typical construction day, construction equipment would be located as close as 25 feet to the residential properties but would typically be located at an average distance of 55 feet away due to the nature of construction equipment operating at different locations on the project site throughout the day. Construction equipment would be located as close as 100 feet to the industrial property.

Typical construction equipment associated with the loudest intersection improvements and signalization phases are modeled for a conservative analysis and are shown in Table 8. Table 8 shows the combined hourly and maximum construction noise levels attributable to each construction sequence modeled, receivers analyzed, and resulting exterior and interior noise levels.

Table 8. Construction Noise Levels at Receivers

Construction Equipment	Land Use	Distance to Receiver, Feet	Approximate Noise Level, dBA			
			Exterior		Interior	
			L _{eq}	L _{max}	L _{eq}	L _{max} ¹
Remove Existing Drainage Facilities - 2 Dump Trucks, Excavator	285 Todd Ave Residential	65	77	78	52	53
	311 Todd Ave Residential	55	78	80	53	55
	246 Ghilotti Ave Commercial	100	73	75	48	50
Signal Pole Foundations Excavating – Dump Truck, Auger Drill Rig, Loader	285 Todd Ave Residential	65	77	78	52	53
	311 Todd Ave Residential	55	78	80	53	55
	246 Ghilotti Ave Commercial	100	74	78	49	53
Repair Existing Pavement – Jackhammer, Backhoe, Dump Truck	285 Todd Ave Residential	65	81	87	56	62
	311 Todd Ave Residential	55	82	88	57	63
	246 Ghilotti Ave Commercial	100	77	83	52	58

¹Assuming an exterior to interior noise reduction of 25 dBA due to typical building standards and windows closed.
L_{eq}: one-hour equivalent noise level; L_{max}: instantaneous maximum noise level; dBA: A-weighted decibel

As shown in Table 8, project construction hourly noise would range from 77 dBA L_{eq} to 82 dBA L_{eq} at the nearest residential receivers, with maximum noise levels ranging from 78 dBA L_{max} to 88 dBA L_{max}. Modeled project construction noise levels at the adjacent commercial property would range from 73 dBA L_{eq} to 77 dBA L_{eq}, with maximum noise levels ranging from 75 dBA L_{max} to 83 dBA L_{max}. Resulting hourly interior noise levels at residential receivers would range from 52 dBA L_{eq} to 57 dBA L_{eq} during to the heaviest periods of construction phases. Ambient noise levels in the project area,

range from 72.0 to 72.4 dBA L_{eq} during daytime hours at residential receivers. The increase in existing ambient noise levels due to the operation of project construction equipment would range from 1 to 10 dBA at noise sensitive residential uses and up to 14 dBA at adjacent industrial uses, depending on the construction phase.

The proposed project would result in the generation of a substantial temporary increase in ambient noise levels in the vicinity of the proposed project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. However, these construction-related impacts would be temporary and would occur only during the construction phase of the project. If the proposed project does not adhere to Section 14-8.02 Noise Control, of the Caltrans Standard Specifications, construction noise would be significant if construction operations exceed 86 dBA at 50 feet at any time during the day. Nighttime construction work may be conducted to avoid heavy daytime traffic. Therefore, construction noise impacts could be significant if conducted during the nighttime hours. Implementation of a sound barrier and/or sound blanket as described in Mitigation Measure NOI-1 would reduce noise levels by at least 5 dBA; therefore, noise levels from project construction would not exceed 86 dBA at 50 feet at a residentially zoned property with mitigation incorporated. Therefore, impacts would be less than significant with mitigation incorporated. Mitigation Measure NOI-1 will be incorporated into project CMP described in the project description.

Mitigation Measures

NOI-1

- Commence any particularly noisy part of the construction activity (such as masonry sawing or jack hammering) after 9 a.m.;
- Locate noise-generating equipment or processes so that their impact on neighboring premises is minimized by increasing distance between source and receiver or using intervening structures/barriers;
- Shut or throttle equipment down whenever not in actual use;
- Ensure that noise reduction devices such as mufflers are fitted and operating effectively;
- Ensure that equipment is not operated if maintenance or repairs would eliminate or significantly reduce a characteristic of noise resulting from its operation that is audible at noise-affected premises;
- Where noise levels may expose residentially-zoned property to construction noise levels that exceeds 86 dBA at 50 feet, implement a temporary sound barrier and/or sound blanket that would break the line of sight between the construction equipment and the affected receiver(s); and
- Operate equipment and handle materials to minimize impact noise (such as avoiding dropping materials from height).

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

Less than Significant Impact. Construction activities known to generate excessive ground-borne vibration, such as pile driving, are not proposed as part of the Project. The greatest anticipated source of vibration during general project construction activities would be from a vibratory roller, which may be used during paving activities and may be used within 25 feet of the nearest off-site residential structure. A vibratory roller would create approximately 0.210 in./sec. PPV at 25 feet (Caltrans 2013b). This would be below a distinctly perceptible impact for humans of 0.24 in./sec. PPV, and the structural damage impact to residential structures of 0.4 in./sec. PPV. Therefore, although a vibratory roller may be perceptible to nearby human receivers, temporary impacts associated with the roller (and other potential equipment) would be less than significant. The proposed project does not include substantial vibration sources associated with operation. Impacts would be less than significant, and no mitigation is required.

c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where*

such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Santa Rosa Air Center is located approximately 2.7 miles northwest of the project site. The project site is not located within two miles of a public airport or private airstrip or located in an airport land use plan. No substantial noise exposure would occur to construction workers or users of the intersection from aircraft noise. No impact would occur.

1.14 POPULATION AND HOUSING

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

Setting

The project site is largely associated with existing transportation related uses. Adjacent properties are associated with industrial related uses, agricultural, and there is one residential property. Zoning within the project site is primarily related to industrial related uses. The purpose of the proposed project is to improve the intersection of Todd Road at Standish Avenue to meet current Sonoma County standards and signalize the intersection to facilitate current and projected traffic movements including large truck traffic.

Impact Analysis

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

No Impact. The proposed project will not induce unplanned population growth in the area directly or indirectly. The proposed project reconstructs an existing intersection to include a signal and the proposed project does not include new construction of homes or businesses or the extension of roads and other infrastructure that would have the potential to induce substantial unplanned population growth. Construction workers are assumed to be local and would not require additional housing. No impact would occur.

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

No Impact. The proposed project does not displace people or housing. The proposed project is primarily within existing transportation right-of-way. The acquisition of approximately 0.1 acre required for improvements is located on the edge of one property and does not impact the existing or zoned uses of the affected parcels. No impact would occur.

1.15 PUBLIC SERVICES

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

Setting

Fire Protection - Fire protection is provided by the Sonoma County Fire District. The nearest fire station, County Station 4, is located at 207 Todd Road about 600 feet east of the project site.

Police Protection - Police protection is provided by Sonoma County Sheriff. Todd Road is the boundary line between Zone 3 which provides service to areas to the north and Zone 5 which provides service to the areas to the south. Zones 3 and 5 operate from the Main Office located in the City of Santa Rosa.

Schools, Parks, and Other Public Facilities – there are no schools, parks, or other public facilities within the project site or in the immediate vicinity. The nearest public school, park, or other public facilities are located at least 0.5 mile from the project site.

Impact Analysis

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

No Impact. The proposed project upgrades the Todd Road/Standish Avenue intersection to meet Sonoma County standards and would not result in impacts associated with induced population growth during operation that trigger the need for new or altered government services. No impact would occur.

1.16 RECREATION

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The project site is located in an area of industrial and rural residential development. There are no parks or other recreational facilities in close proximity. The nearest park or other recreational facility is located about 0.5 mile to the north of the project site (Andy Lopez Unity Park).

Impact Analysis

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

No Impact. The proposed project does not result in the increased use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration would occur or be accelerated. No impact would occur.

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

No Impact. The proposed project does not include the construction or expansion of recreational facilities. No impact would occur.

1.17 TRANSPORTATION

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

Setting

Project site public roadways include Todd Road and Standish Avenue. Ghilotti Way is a private roadway/driveway. All roadways are two lanes and Todd Road includes two approximate 150 feet long left turn pockets at the intersection with Standish Avenue. SR 101 is located about 1,900 feet east of the Todd Road/Standish Avenue intersection. Sonoma County Transit operates one bus route (Route 42) that provides weekday service, between approximately 7:30 am to 5:30 pm, to the project site and includes a stop within the project site. There are no bicycle facilities on the project site roadways. The only pedestrian facility is a sidewalk located in the northeast corner of the intersection, and there are no marked pedestrian crossings at the intersection. On January 19, 2022, the Bicycle Pedestrian Advisory Committee voted unanimously to incorporate signs and striping for Class II bicycle lanes on both sides of the signalized intersection from the SMART railroad right-of-way to the east of Todd Road where the roadway narrows consistent with the 2010 Sonoma County Bicycle and Pedestrian Path Plan.

Impact Analysis

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

No Impact. The proposed project does not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The proposed project is consistent with the Circulation and Transit Element goals and policies from the Sonoma County General Plan (Sonoma 2020) and 2010 Sonoma County Bicycle and Pedestrian Plan (refer to Table 9).

The Sonoma County bus stop for Route 42 would be relocated outside of the construction zone to the east for the duration of the construction and returned afterwards. This would not limit or change transit accessibility nor route schedules and therefore it would not affect ridership or bus routes. Advanced notification would be provided to transit riders based on the outreach plan included in the CMP (as described in the project description). No impact would occur.

The proposed project would implement a portion of the Class II Bikeway planned on Todd Road between Santa Rosa Avenue and State Highway 116 as identified in the 2010 Sonoma County Bicycle and Pedestrian Plan and the Circulation and Transit Element of the Sonoma County General Plan 2020. Class II bike lanes are included on both sides of Todd Road as part of the proposed project and have been designed to meet the guidelines of the 2020 version of Chapter 1000 of the Caltrans Highway Design Manual, AASHTO's *Guide for the Development of Bicycle Facilities*, and the California Manual on Uniform Traffic Control Devices consistent with Policy 2.02 in the 2010 Bicycle and Pedestrian Plan.

Table 9. Sonoma County General Plan – Consistency

Applicable Goal, Policy, or Measure	Project Consistency
Circulation and Transit Element	
2.4 Public Transit and Motor Vehicle Trip Reduction	
<p>Policy CT-3a: Use the adopted Sonoma County Bicycle and Pedestrian Plan (Bikeways Plan) as the detailed planning document for existing and proposed bikeways and pedestrian facilities.</p>	<p>Consistent. The proposed project would construct a segment of the planned Class II Bikeway on Todd Road.</p>
<p>Policy CT-3c: The Sonoma County Bicycle and Pedestrian Advisory Committee (BPAC) shall be responsible for advising the Board of Supervisors, Planning Commission, Board of Zoning Adjustments, Project Review Advisory Committee, and County staff on the ongoing planning and coordination of the County's bicycle and pedestrian transportation network.</p>	<p>Consistent. The proposed project coordinated with the BPAC on including Class II bicycle lanes on Todd Road within the project limits.</p>
<p>Policy CT-3g: Design, construct, and improve bikeways consistent with the Bikeways Plan (Project Priority List). This list shall establish the priority, class, and location of Sonoma County bikeways projects.</p>	<p>Consistent. The proposed project would construct a section of Class II bicycle lanes that are part of a larger project in the Bikeways Plan to construct bicycle lanes on an approximate 5-mile section of Todd Road.</p>
<p>Policy CT-3t: Require that bikeway improvements be included as part of all road maintenance or improvement projects along road segments with existing or proposed bikeways to the maximum extent feasible.</p>	<p>Consistent. The proposed project includes the construction of Class II bicycle lanes within the project limits.</p>
<p>Policy CT-3u: Upgrade or adjust existing traffic signal detectors on County roadways to reliably detect bicycles. On streets without dedicated right turn lanes where upgrading the existing traffic signal loop detector is not feasible, install buttons to trigger the signal located such that bicyclists do not have to leave the bikeway to use the button.</p>	<p>Consistent. The proposed project includes bicycle detection for east bound bicycles turning north onto Standish Avenue as part of the signalization of the intersection (west bound left going south are not needed since it is a private driveway). In addition, push button crossings are installed at the intersection for pedestrians and bicyclists.</p>
<p>Policy CT-3vv: Provide high-visibility crosswalk marking at all intersections in Urban Service Areas, and wherever feasible countywide. Wherever possible, avoid mid-block pedestrian crossings, and where mid-block crossings are necessary, install signalization, refuge islands and signage warning vehicles to stop for pedestrians and watch for cyclists.</p>	<p>Consistent. Although not located within an Urban Service Area, the proposed project installs high-visibility crosswalk markings at the intersection and the signalization includes the installation of push button crossings.</p>
<p>Policy CT-3z: Require road construction projects to minimize their impacts on bicyclists and pedestrians through the proper placement of construction signs and equipment and by providing adequate, safe, well-marked detours. Where it is safe to do</p>	<p>Consistent. Although there is limited bicycle and pedestrian infrastructure in the project area, signage and safety cones would be set-up during construction to ensure the safe movement of pedestrians and bicyclists through the construction zone.</p>

Applicable Goal, Policy, or Measure	Project Consistency
<p>so, allow bicyclists and pedestrians to pass through construction areas in order to avoid detours. Where two-way bicycle and pedestrian travel can be safely accommodated in a one-way traffic control zone, adequate signage shall be placed to alert motorists of bicycles and pedestrians in the lane.</p>	
<p>Policy CT-3vv: Provide high-visibility crosswalk marking at all intersections in Urban Service Areas, and wherever feasible countywide. Wherever possible, avoid mid-block pedestrian crossings, and where mid-block crossings are necessary, install signalization, refuge islands and signage warning vehicles to stop for pedestrians and watch for cyclists.</p>	<p>Consistent. Although not located within an Urban Service Area, the proposed project installs high-visibility crosswalk markings at the intersection and the signalization includes the installation of push button crossings.</p>

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

No Impact. The proposed project does not conflict and is not inconsistent with 15064.3, subdivision (b). The purpose of the proposed project is to improve the intersection of Todd Road at Standish Avenue to meet current Sonoma County standards and signalize the intersection to facilitate current and projected traffic movements including large truck traffic. The proposed project does not result in new trips, changes in vehicles miles traveled, or changes to land use that would induce vehicle travel or increases in vehicle miles traveled. The proposed project improves the cyclists' and pedestrian experience in the project area and creates a better connection to SMART. The improvements would encourage the use of other modes of transportation. No impact would occur.

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

No Impact. The proposed project does not result in increased hazards due to a geometric design feature. The proposed project signalizes the intersection to facilitate current and projected traffic movements including large truck traffic. No impact would occur.

d) *Result in inadequate emergency access?*

No Impact. Todd Road and Standish Avenue would remain open during construction. Emergency access would be maintained during construction. No detours are planned. The CMP described in the project description will include a traffic management plan. The traffic management plan would be prepared and approved in coordination with fire and police protection prior to construction. The completed project does not include any components that would result in changes to or inadequate emergency access. No impact would occur.

1.18 TRIBAL CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)? 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:	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Setting

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and is:

1. 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
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

Impact Analysis

Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)?

On Friday, January 29, 2021, Sonoma County prepared and mailed an AB 52 notification letter to the following Native American Tribes and provided the opportunity to request a consultation:

- Mishewal Wappo Tribe of Alexander Valley
- Middletown Rancheria Band of Pomo Indians
- Lytton Rancheria of California
- Kashia Pomos Stewarts Point Rancheria
- Dry Creek Rancheria Band of Pomo Indians
- The Federated Indians of Graton Rancheria
- Cloverdale Rancheria Band of Pomo Indians

No requests for consultation were received.

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

- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or*
- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

Less than Significant Impact with Mitigation. Based on the responses under Cultural Resources (Section 1.5), there are no CRHR-eligible or listed resources within the project site. At this time, no specific tribal cultural resources have been identified. Therefore, for the purposes of this analysis, Sonoma County assumes that no tribal resources are present on the project site. However, because the proposed project involves ground disturbance, there is the possibility of encountering undisturbed subsurface tribal cultural resources during construction. Therefore, the proposed project could result in potentially significant impacts to tribal cultural resources and mitigation is required. Implementation of mitigation measure CUL-1 will reduce potential impacts to less than significant.

1.19 UTILITIES AND SERVICE SYSTEMS

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

Setting

The City of Santa Rosa provides wastewater and water service to properties in the project site. Stormwater drainage in the project site consists of undeveloped drainage ditches and developed drainage facilities with stormwater inlets and catch basins. PG&E provides electrical and natural gas service to the project site and has below and above grade facilities. Solid waste disposal would be disposed of at the Central Disposal Site, in Petaluma, if the materials are non-hazardous. The Central Disposal Site has approximately 9.1 million cubic yards of capacity remaining (CalRecycle 2024a) and accepts residential garbage, carpet/padding, appliances, electronics, mattresses, tires, pressure treated wood, small motor items, and boats and cabover campers. Also available is the Altamont Landfill & Resource Recovery in Livermore which has approximately 65 million cubic yards of capacity remaining and accepts friable and non-friable asbestos, Class II materials (household garbage, clean wood, green waste, construction and demolition debris), Class II materials (treated or painted wood), and contaminated soils (CalRecycle 2024b).

Impact Analysis

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

Less than Significant Impact. The proposed project requires the relocation and replacement of existing storm drain facilities and construction of new storm drain facilities. The proposed project does not result in new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, there no significant environmental effects. The proposed project does result in a small increase in impervious surfaces (approximately 4,000 square feet) but the increase does not change existing stormwater drainage patterns. Other utilities within the project site would be protected in place or not impacted. Impacts would be less than significant,

and no mitigation is required.

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

Less than Significant Impact. Construction activities would require water supplies for activities including dust control. Once construction is complete the proposed project does not require or result in changes to water supplies. The amount of water needed during construction would be minimal because the size of the project site is relatively small (about 2.66 acres) and the duration of construction would be less than two months. The proposed project does not result in changes to water supplies during operation because the proposed project would upgrade an existing intersection and does not require water supplies after construction ends. Impacts would be less than significant, and no mitigation is required.

- c) *Result in a determination by the wastewater treatment provider that 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?*

No Impact. The proposed project does not result in changes to the wastewater treatment system existing or future capacity. During construction, if portable toilets are required the waste would be transported to the appropriate facilities for disposal and treatment. Given the short duration of construction, no impacts are anticipated. Operation does not require wastewater treatment at the project site. No impact would occur.

- 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?*

Less than Significant Impact. Construction activities would generate solid waste associated with reconstruction of the roadway. The amount of solid waste generated would be minimal given the size of the project site and the type of construction required. Solid waste would be disposed of at permitted facilities including the Central Disposal Site or Altamont Landfill & Resource Recovery. Both sites have capacity to meet the needs of the proposed project and construction would not generate waste in excess of the capacity of local infrastructure. During operation there would be no generation of solid waste. Impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. Construction would not result in impact on landfill capacity and would comply with the relevant statutes and regulations relate to solid waste. Operation does not result in generation of waste. Impacts would be less than significant, and no mitigation is required.

1.20 WILDFIRE

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

Setting

The project site is located within an urbanized area of unincorporated Sonoma County within a Local Responsibility Area. The Sonoma County Fire Protection District would respond to calls and the nearest station is located about 600 feet to the east on Todd Road.

Impact Analysis

Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?

No Impact. The project site is not located in or near state responsibility areas or lands classified as high fire hazard severity zones. The nearest state responsibility area and high fire hazard severity zone is about 2 miles east of the project site (CalFire 2020). No impact would occur.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a) *Substantially impair an adopted emergency response plan or emergency evacuation plan?*
- b) *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- c) *Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- d) *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

1.21 MANDATORY FINDINGS OF SIGNIFICANCE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

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

Less than Significant Impact with Mitigation. As discussed in Section 1.4, *Biological Resources*, project construction could affect special status plant and wildlife species if they are present within the project site. The project site is located within an urbanized area of unincorporated Sonoma County. Given the small size of the project site, about 2.66 acres, and the proposed project is predominantly within the existing roadway, and the development that surrounds the project site, the potential for the special status species identified to occur is low. BMPs implemented as part of construction (e.g., silt fences) would further reduce the potential impacts on special status species, if they are present within the project site. With the implementation of Mitigation Measures BIO-1, BIO-2, and BIO-3 the impacts would be reduced to a less than significant impact.

Based on information in Section 1.5, *Cultural Resources*, and Section 1.18, *Tribal and Cultural Resources*, there were no historical resources that would be impacted by the proposed project. In addition, there were no archaeological resources identified; however, there is the potential for unanticipated discoveries during construction. Because resources could be uncovered during construction there is the potential for significant impacts. With the implementation of Mitigation Measure CUL-1 the impacts would be reduced to a less than significant impact.

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

effects of probable future projects.)

Less than Significant Impact. Based up on the analysis conducted for this Initial Study, most of the resources would either result in no impact or the impact would be less than significant for construction and operation. For Biological Resources, Cultural Resources, Geology and Soils, and Hazardous Materials, the impacts during construction would be less than significant with the implementation of mitigation measures and there are no impacts associated with operation. If the contractor elects to implement construction at night, noise impacts to the sensitive receptor would be less than significant if NOI-1 is implemented. The proposed project would not induce population growth or result in the development of new housing or employment and would not result in cumulative impacts related to the increase in demand for public services, recreation facilities, and utilities.

The proposed project would result in impacts that are individually limited and not cumulatively considerable. Impacts would be less than significant.

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

Less than Significant Impact. The proposed project does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly. The proposed project improves the existing intersection of Todd Road at Standish Avenue to meet current Sonoma County standards and signalize the intersection to facilitate current and projected traffic movements including large truck traffic. Effects would be limited to construction which has a short duration of between 40 to 50 days and once construction is complete impacts would cease. Compliance with existing regulations would reduce the risk of potential release of hazardous materials during construction and not result in substantial adverse effects on human beings. The proposed project would not alter the daily use of the two roadways during operation and would not alter the existing use of the affected roads for routine transport, use, or disposal of hazardous materials or risk of upset or accident, and thereby would not result in a significant hazard to the public or the environment. The proposed project would result in benefits associated with the new traffic signal by reducing the potential conflicts between pedestrians and vehicles and promotes multiple modes of transportation. As noted above under a), the proposed project would have mostly no impact or a less than significant impact on most of the resources and for others with the implementation of mitigation the impacts would be less than significant. Impacts on human beings would be less than significant.

REFERENCES

- Association of Bay Area Governments (ABAG). 2017. Plan Bay Area 2040. Adopted July 2017. <http://files.mtc.ca.gov/library/pub/29823.pdf>
- Bay Area Air Quality Management District (BAAQMD). 2017a. Final 2017 Clean Air Plan. Adopted April 18, 2017. http://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en
- _____. 2017b. CEQA Air Quality Guidelines. May 2017. http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en
- _____. 2020. Air Quality Standards and Attainment Status. <http://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status>
- California Air Resources Board (CARB). 2017. The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target. Sacramento, CA. January 20, 2017.
- _____. 2018. CA-Greet 3.0. Released August 13, 2018. Effective January 4, 2019. <https://www.arb.ca.gov/fuels/lcfs/ca-greet/ca-greet.htm>
- _____. 2013. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. (CT-HWANP-RT-13-069.25.2) September. http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf
- _____. 2020. Transportation and Construction Vibration Guidance Manual. Available at: <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf>
- _____. 2024. Maps of State and Federal Area Designations. Available at: <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>. Accessed: June 2024
- California Department of Conservation (DOC). 2021. EQ Zapp: California Earthquake Hazards Zone Application – Earthquake Zones of Required Investigation. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>
- California Department of Conservation (CDC). 2020. California Important Farmland Finder. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>.
- California Department of Fish and Wildlife. 2024. CNDDDB RareFind Version 5.3.0. Last accessed: 13 June 2024
- California Department of Forestry and Fire Protection (CAL FIRE). 2008. Sonoma County: Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. https://osfm.fire.ca.gov/media/6820/fhszl_map49.pdf
- California Department of Forestry and Fire Protection (CAL FIRE). 2020. Sonoma County: Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. <https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414>
- California Department of Fire and Forestry Protection (CAL FIRE). 2020. *California Fire Hazard Severity Zones*. Available at: <https://hub-calfire-forestry.hub.arcgis.com/datasets/california-fire-hazard-severity-zones-fhsz?geometry=-124.122%2C38.031%2C-121.260%2C38.784>.
- California Department of Toxic Substances Control (DTSC). 2020. Envirostor Data Management System.
- California Department of Transportation (Caltrans). 2020. Caltrans Highway Design Manual, Chapter 1000. Available at: <https://dot.ca.gov/-/media/dot-media/programs/design/documents/chp1000-a11y.pdf>
- California Department of Transportation (Caltrans). 2019. *Scenic Highways Systems List*. Available at: <https://dot.ca.gov/-/media/dot-media/programs/design/documents/od-county-scenic-hwys-2015-a11y.pdf>.

- California Department of Transportation (Caltrans). 2023. Standard Specifications, 2023 edition. Available at: <https://dot.ca.gov/programs/design/july-2023-ccs-standard-plans-and-standard-specifications>.
- California Geological Survey. 2005. *Mineral Land Classification of Aggregate Materials in Sonoma County, California*. Available at: <https://maps.conservation.ca.gov/mineralresources/#datalist>.
- California Native Plant Society (CNPS). 2024. CNPS Rare Plant Inventory quire for *Eastwoodiella californica*. Available at: <https://rareplants.cnps.org/Plants/Details/264>. Last Accessed: 12 June 2024
- CalRecycle. 2019a. SWIS Facility/Site Activity Details – Central Disposal Site. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/3621>.
- CalRecycle. 2019b. *SWIS Facility/Site Activity Details – Altamont Landfill & Resource Recovery*. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/7>.
- California State Water Resources Control Board (SWRCB). 2020. GeoTracker Data Management System.
- FEMA. 2022. National Flood Hazard Layer FIRMette. *Panel 06097C0738G, Effective date: 7/19/2022*. Available at: <https://msc.fema.gov/portal/search?AddressQuery=Santa%20Roas%20CA>.
- Rincon. 26 January 2021a. Biological Resources Assessment for the Todd Road/Standish Avenue Signalization Project in Sonoma County, California.
- Rincon. January 2021b. Cultural Resources Assessment for the Todd Road/Standish Avenue Signalization Project in Sonoma County, California.
- Rincon. 26 January 2021c. Phase I Environmental Site Assessment for the Todd Road/Standish Avenue Signalization Project in Sonoma County, California.
- Rincon. January 2021d. Construction Noise Assessment for the Todd Road/Standish Avenue Signalization Project in Sonoma County, California.
- Rincon. 12 March 2024. Supplemental Memorandum to the Biological Resources Assessment for the Todd Road/Standish Avenue Signalization Project in Sonoma County, California.
- State Water Resources Control Board. 2012. Impaired Waterbodies. Available at: https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2012.shtml. Last accessed January 26, 2021.
- Santa Rosa, City of. 2009. City of Santa Rosa General Plan. Santa Rosa, CA. <https://srcity.org/DocumentCenter/View/24327/Santa-Rosa-General-Plan-2035-PDF---July-2019>.
- Sonoma, County of. 2010. Sonoma County Bicycle and Pedestrian Plan, Available at: <https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Bicycle-and-Pedestrian-Plan/>
- Sonoma, County of. 2016. Circulation and Transit Element of the Sonoma County General Plan 2020. Available at: <https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/General-Plan/Circulation-and-Transit/>
- Sonoma, County of. 2016. Erosion Prevention and Sediment Control Notes. Sonoma County, <https://sonomacounty.ca.gov/PRMD/Eng-and-Constr/Grading-and-Storm-Water/Erosion-Prevention-and-Sediment-Control/>
- Sonoma, County of. 2019. Visual Assessment Guidelines. Available at: <https://sonomacounty.ca.gov/PRMD/Regulations/Environmental-Review-Guidelines/Visual-Assessment-Guidelines/>.
- Sonoma, County of. 2020. Open Space Scenic Resource Areas. Available at: <https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/General-Plan/Open-Space-Scenic-Resource-Areas/>.
- Sonoma, County of. 2020. Parcel Search - Zoning and Parcel Report. Available at: <https://sonomacounty.ca.gov/PRMD/Services/Parcel-Search/>.

TJKM Inc. 5 February 2021. Traffic Management Technical Memorandum for Todd Road and Standish Avenue intersection Realignment in Sonoma County, CA.

TYLin. 7 February 2024. Todd Road and Standish Avenue Intersection Improvement Project – Construction Noise Assessment.

TYLin. 7 February 2024. Todd Road and Standish Avenue Intersection Improvement Project – Phase I Environmental Site Assessment.

TYLin. 7 February 2024. Todd Road and Standish Avenue Intersection Improvement Project – Traffic Management Technical Memorandum.

TYLin. 14 December 2023. Todd Road and Standish Avenue Intersection Improvement Project – Logical Termini Memorandum.

United States Department of Agriculture (USDA). Natural Resources Conservation Services (NRCS). Web Soil Survey. 2021. <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

United States Environmental Protection Agency (USEPA). 2016. Nonroad Compression-Ignition Engines: Exhaust Emission Standards. <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100OA05.pdf>

United States Fish and Wildlife Service (USFWS). September 2020. Monarch (*Danaus plexippus*) Species Status Assessment Report, V2.1. 96 pp+ appendices.

Western Association of Fish and Wildlife Agencies (WAFWA). 2019. Western Monarch Butterfly Conservation Plan, 2019-2069. Western Monarch Working Group.

Xerces Society, Idaho Department of Fish and Game, Washington Department of Fish and Wildlife, National Fish and Wildlife Foundation, and United States Fish and Wildlife Service. 2024a. Western Monarch Milkweed Mapper, Western Monarch Biology (online). Available: <https://www.monarchmilkweedmapper.org/western-monarch-biology/>. Accessed: June 2024.

Xerces Society, Idaho Department of Fish and Game, Washington Department of Fish and Wildlife, National Fish and Wildlife Foundation, and United States Fish and Wildlife Service. 2024b). Western Monarch Milkweed Mapper, Mapper (online). Available: [monarchmilkweedmapper.org/app/#/combined/map](https://www.monarchmilkweedmapper.org/app/#/combined/map). Accessed: June 2024.

Xerces Society. 2024c. Priority Action Zones in California for Recovering Western Monarchs. Available: <https://xerces.org/publications/fact-sheets/priority-action-zones-in-california-for-recovering-western-monarchs>. Accessed: June 2024.

Appendix A

Air Quality Modeling Outputs

Todd Road / Standish Ave. Signalization Project Custom Report, 6/6/2024

1. Basic Project Information

Land Use Subtype	Size	Unit	Lot Acreage
Road Construction	0.26	Mile	1.90

2. Emissions Summary

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max) (unmitigated)	3.60	31.5	32.4	0.06	1.42	3.51	4.93	1.31	0.42	1.73	—	6,901	6,901	0.28	0.08	6,933
Daily, Winter (Max) (unmitigated)	3.10	28.3	28.4	0.06	1.13	2.98	4.10	1.04	0.36	1.40	—	6,355	6,355	0.27	0.07	6,383
Average Daily (Max) (unmitigated)	0.39	3.44	3.59	0.01	0.15	0.36	0.51	0.14	0.04	0.18	—	756	756	0.03	0.01	760
Annual (Max) (unmitigated)	0.07	0.63	0.66	< 0.005	0.03	0.07	0.09	0.03	0.01	0.03	—	125	125	0.01	< 0.005	126
Exceeds (Daily Max) Threshold	54.0	54.0	—	—	—	—	82.0	—	—	54.0	—	—	—	—	—	—
(Unmitigated)	No	No	—	—	—	—	No	—	—	No	—	—	—	—	—	—
Exceeds (Average Daily) Threshold	54.0	54.0	—	—	—	—	82.0	—	—	54.0	—	—	—	—	—	—
(Unmitigated)	No	No	—	—	—	—	No	—	—	No	—	—	—	—	—	—

Appendix B

Special Status Species Tables

Special-Status Plant Species in the Regional Vicinity (Nine Quad) of the Study Area

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
<i>Allium peninsulare</i> var. <i>franciscanum</i> Franciscan onion	None/None G5T2/S2 1B.2	Cismontane woodland, Valley and foothill grassland. clay, volcanic, often serpentinite. 52 - 305 m. perennial bulbiferous herb. Blooms (Apr)May-Jun	Not Expected	Suitable elevation is not present.
<i>Alopecurus aequalis</i> var. <i>sonomensis</i> Sonoma alopecurus	FE/None G5T1/S1 1B.1	Marshes and swamps (freshwater), Riparian scrub. 5 - 365 m. perennial herb. Blooms May-Jul	Not Expected	Marshes, swamps, and riparian scrub are not present.
<i>Amorpha californica</i> var. <i>napensis</i> Napa false indigo	None/None G4T2/S2 1B.2	Broadleafed upland forest (openings), Chaparral, Cismontane woodland. 50 - 2000 m. perennial deciduous shrub. Blooms Apr-Jul	Not Expected	Suitable habitat and elevation are not present.
<i>Amsinckia lunaris</i> bent-flowered fiddleneck	None/None G3/S3 1B.2	Coastal bluff scrub, Cismontane woodland, Valley and foothill grassland. 3 - 500 m. annual herb. Blooms Mar- Jun	Not Expected	Native grasslands are not present. One historic occurrence (1940) has been reported 3.8 miles to the north (Rincon 2021)
<i>Arctostaphylos densiflora</i> Vine Hill manzanita	None/SCE G1/S1 1B.1	Chaparral (acid marine sand). 50 - 120 m. perennial evergreen shrub. Blooms Feb-Apr	Not Expected	Suitable habitat and elevation are not present.
<i>Arctostaphylos stanfordiana</i> ssp. <i>decumbens</i> Rincon Ridge manzanita	None/None G3T1/S1 1B.1	Chaparral (rhyolitic), Cismontane woodland. 75 - 370 m. perennial evergreen shrub. Blooms Feb-Apr(May)	Not Expected	Suitable habitat and elevation are not present.
<i>Astragalus claranus</i> Clara Hunt's milk-vetch	FE/SCT G1/S1 1B.1	Chaparral (openings), Cismontane woodland, Valley and foothill grassland. serpentinite or volcanic, rocky, clay. 75 - 275 m. annual herb. Blooms Mar-May	Not Expected	Suitable habitat and elevation are not present.
<i>Balsamorhiza macrolepis</i> big-scale balsamroot	None/None G2/S2 1B.2	Chaparral, Cismontane woodland, Valley and foothill grassland. sometimes serpentinite. 45 - 1555 m. perennial herb. Blooms Mar-Jun	Not Expected	Suitable habitat and elevation are not present.
<i>Blennosperma bakeri</i> Sonoma sunshine	FE/SCE G1/S1 1B.1	Valley and foothill grassland (mesic), Vernal pools. 10 - 110 m. annual herb. Blooms Mar-May	Not Expected	Ruderal grasslands within the project site are heavily disturbed and vernal pools are not present within the site. Eleven (11) occurrences, three (3) of which are historic, have been reported within 5 miles in undeveloped areas with seasonal wetlands and vernal pools (Rincon 2021).

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
<i>Brodiaea leptandra</i> narrow-anthered brodiaea	None/None G3?/S3? 1B.2	Broadleafed upland forest, Chaparral, Cismontane woodland, Lower montane coniferous forest, Valley and foothill grassland. volcanic. 110 - 915 m. perennial bulbiferous herb. Blooms May-Jul	Not Expected	Suitable habitat and elevation are not present.
<i>Calamagrostis crassiglumis</i> Thurber's reed grass	None/None G3Q/S2 2B.1	Coastal scrub (mesic), Marshes and swamps (freshwater). 10 - 60 m. perennial rhizomatous herb. Blooms May-Aug	Not Expected	Suitable habitat is not present.
<i>Campanula californica</i> swamp harebell	None/None 1B.2	Perennial rhizomatous herb that occurs in mesic area of bogs and fens, closed-cone coniferous forest, coastal prairie, meadows and seeps, marshes and swamps (freshwater), and north coast coniferous forest from 5 to 1330 feet elevation. Blooms June-October (CNPS 2024)	Not Expected	Suitable habitat is not present.
<i>Castilleja uliginosa</i> Pitkin Marsh paintbrush	None/SCE GXQ/SX 1A	Marshes and swamps (freshwater). 240 - 240 m. perennial herb (hemiparasitic). Blooms Jun-Jul	Not Expected	Suitable habitat and elevation are not present.
<i>Carex albida</i> , white sedge	FE/ SE	Known from only one confirmed extant occurrence in the world; from Pitkin Marsh, Sonoma County. Current taxonomic treatment considers <i>Carex albida</i> as a synonym of <i>Carex lemmonii</i> , a common taxon. No longer tracked by CNDDDB	Not Expected	The project is not located at Pitkin Marsh. No habitat is present in the project area.
<i>Ceanothus confusus</i> Rincon Ridge ceanothus	None/None G1/S1 1B.1	Closed-cone coniferous forest, Chaparral, Cismontane woodland. volcanic or serpentinite. 75 - 1065 m. perennial evergreen shrub. Blooms Feb-Jun	Not Expected	Suitable habitat and elevation are not present.
<i>Ceanothus divergens</i> Calistoga ceanothus	None/None G2/S2 1B.2	Chaparral (serpentinite or volcanic, rocky). 170 - 950 m. perennial evergreen shrub. Blooms Feb-Apr	Not Expected	Suitable habitat and elevation are not present.
<i>Ceanothus foliosus</i> var. <i>vineatus</i> Vine Hill ceanothus	None/None G3T1/S1 1B.1	Chaparral. 45 - 305 m. perennial evergreen shrub. Blooms Mar-May	Not Expected	Suitable elevation and habitat are not present.
<i>Ceanothus purpureus</i> holly-leaved ceanothus	None/None G2/S2 1B.2	Chaparral, Cismontane woodland. volcanic, rocky. 120 - 640 m. perennial evergreen shrub. Blooms Feb-Jun	Not Expected	Suitable elevation and habitat are not present.
<i>Ceanothus sonomensis</i> Sonoma ceanothus	None/None G2/S2 1B.2	Chaparral (sandy, serpentinite or volcanic). 215 - 800 m. perennial evergreen shrub. Blooms Feb-Apr	Not Expected	Suitable elevation and habitat are not present.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
<i>Centromadia parryi</i> <i>ssp. parryi</i> pappose tarplant	None/None G3T2/S2 1B.2	Chaparral, Coastal prairie, Meadows and seeps, Marshes and swamps (coastal salt), Valley and foothill grassland (vernally mesic). often alkaline. 0 - 420 m. annual herb. Blooms May-Nov	Not Expected	Suitable habitat is not present.
<i>Chorizanthe valida</i> Sonoma spineflower	FE/SCE G1/S1 1B.1	Coastal prairie (sandy). 10- 305 m. annual herb. Blooms Jun-Aug	Not Expected	Suitable habitat is not present.
<i>Clarkia imbricata</i> Vine Hill clarkia	FE/SCE G1/S1 1B.1	Chaparral, Valley and foothill grassland. acidic sandy loam. 50 - 75 m. annual herb. Blooms Jun- Aug	Not Expected	Suitable elevation and habitat are not present.
<i>Cordylanthus tenuis</i> <i>ssp. capillaris</i> Pennell's bird's- beak	FE/SCR G4G5T1/S1 1B.2	Closed-cone coniferous forest, Chaparral. serpentinite. 45 - 305 m. annual herb (hemiparasitic). Blooms Jun-Sep	Not Expected	Suitable elevation and habitat are not present.
<i>Cuscuta obtusiflora</i> <i>var. glandulosa</i> Peruvian dodder	None/None G5T4?/SH 2B.2	Marshes and swamps (freshwater). 15 - 280 m. annual vine (parasitic). Blooms Jul-Oct	Not Expected	Suitable habitat is not present.
<i>Delphinium luteum</i> golden larkspur	FE/SCR G1/S1 1B.1	Chaparral, Coastal prairie, Coastal scrub. rocky. 0 - 100 m. perennial herb. Blooms Mar-May	Not Expected	Suitable habitat is not present.
<i>Downingia pusilla</i> dwarf downingia	None/None GU/S2 2B.2	Valley and foothill grassland (mesic), Vernal pools. 1 - 445 m. annual herb. Blooms Mar-May	Not Expected	Ruderal grasslands within the project site are heavily disturbed and vernal pools are not present within the site. Two (2) occurrences have been reported within 5 miles in undeveloped areas with vernal pools and swales (Rincon 2021)
<i>Erigeron greenei</i> Greene's narrow-leaved daisy	None/None 1B.2	Perennial herb found in chaparral with volcanic/ serpentinite soils from 80 to 1,005 meters. Blooms May through September (CNPS 2024).	Not Expected	Suitable habitat not present.
<i>Erigeron serpentinus</i> serpentine daisy	None/None G2/S2 1B.3	Chaparral (serpentinite, seeps). 60 - 670 m. perennial herb. Blooms May-Aug	Not Expected	Suitable elevation and habitat are not present.
<i>Eryngium constancei</i> Loch Lomond button-celery	FE/SCE G1/S1 1B.1	Vernal pools. 460 - 855 m. annual / perennial herb. Blooms Apr-Jun	Not Expected	Suitable elevation and habitat are not present.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
<i>Fritillaria liliacea</i> fragrant fritillary	None/None G2/S2 1B.2	Cismontane woodland, Coastal prairie, Coastal scrub, Valley and foothill grassland. Often serpentine. 3 - 410 m. perennial bulbiferous herb. Blooms Feb-Apr	Not Expected	Ruderal grasslands within the project site are heavily disturbed, and no native grasslands are present. Six (6) occurrences, four (4) of which are historic, have been reported within 5 miles. Non-historic occurrences are in undeveloped, protected open-space areas (Rincon 2021).
<i>Gilia capitata</i> ssp. <i>tomentosa</i> woolly-headed gilia	None/None G5T1/S1 1B.1	Coastal bluff scrub, Valley and foothill grassland. Serpentine, rocky, outcrops. 10 - 220 m. annual herb. Blooms May-Jul	Not Expected	Suitable habitat is not present.
<i>Gratiola heterosepala</i> Boggs Lake hedge- hyssop	None/SCE G2/S2 1B.2	Marshes and swamps (lake margins), Vernal pools. clay. 10 - 2375 m. annual herb. Blooms Apr- Aug	Not Expected	Suitable habitat is not present.
<i>Hemizonia congesta</i> ssp. <i>congesta</i> congested-headed hayfield tarplant	None/None G5T2/S2 1B.2	Valley and foothill grassland. sometimes roadsides. 20 - 560 m. annual herb. Blooms Apr- Nov	Low	Ruderal grasslands along roadsides are present within the site. Two (2) historic occurrences have been reported within 5 miles (Rincon 2021).
<i>Horkelia tenuiloba</i> thin-lobed horkelia	None/None G2/S2 1B.2	Broadleafed upland forest, Chaparral, Valley and foothill grassland. mesic openings, sandy. 50 - 500 m. perennial herb. Blooms May-Jul(Aug)	Not Expected	Suitable elevation and habitat are not present.
<i>Lasthenia burkei</i> Burke's goldfields	FE/SCE G1/S1 1B.1	Meadows and seeps (mesic), Vernal pools. 15 - 600 m. annual herb. Blooms Apr-Jun	Not Expected	Ruderal grasslands within the project site are heavily disturbed and vernal pools are not present within the site. Seven (7) occurrences presumed to be extant have been reported within 5 miles in undeveloped areas with vernal pools or wetland basins (Rincon 2021).
<i>Lasthenia californica</i> ssp. <i>bakeri</i> Baker's goldfields	None/None G3T1/S1 1B.2	Closed-cone coniferous forest (openings), Coastal scrub, Meadows and seeps, Marshes and swamps. 60 - 520 m. perennial herb. Blooms Apr-Oct	Not Expected	Suitable elevation and habitat are not present.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
<i>Lasthenia conjugens</i> Contra Costa goldfields	FE/None G1/S1 1B.1	Cismontane woodland, Playas (alkaline), Valley and foothill grassland, Vernal pools. mesic. 0 - 470 m. annual herb. Blooms Mar-Jun	Not Expected	No native grasslands or vernal pools are present. No occurrences have been reported within 5 miles (Rincon 2021).
<i>Layia septentrionalis</i> Colusa layia	None/None G2/S2 1B.2	Chaparral, Cismontane woodland, Valley and foothill grassland. sandy, serpentine. 100 - 1095 m. annual herb. Blooms Apr-May	Not Expected	Suitable elevation and habitat are not present.
<i>Legenere limosa</i> legenere	None/None G2/S2 1B.1	Vernal pools. 1 - 880 m. annual herb. Blooms Apr- Jun	Not Expected	Suitable habitat is not present.
<i>Leptosiphon jepsonii</i> Jepson's leptosiphon	None/None G2G3/S2S3 1B.2	Chaparral, Cismontane woodland, Valley and foothill grassland. usually volcanic. 100 - 500 m. annual herb. Blooms Mar- May	Not Expected	Suitable elevation and habitat are not present.
<i>Lilium pardalinum</i> ssp. <i>pitkinense</i> Pitkin Marsh lily	FE/SCE G5T1/S1 1B.1	Cismontane woodland, Meadows and seeps, Marshes and swamps (freshwater). mesic, sandy. 35 - 65 m. perennial bulbiferous herb. Blooms Jun-Jul	Not Expected	Suitable habitat and soils are not present, and site is just below expected elevation range.
<i>Limnanthes vinculans</i> Sebastopol meadowfoam	FE/SCE G1/S1 1B.1	Meadows and seeps, Valley and foothill grassland, Vernal pools. vernally mesic. 15 - 305 m. annual herb. Blooms Apr-May	Not Expected	Native grasslands and vernal pools are not present. Thirty (30) occurrences have been reported within 5 miles in vernal pools and wet meadows in undeveloped areas (Rincon 2021).
<i>Lupinus sericatus</i> Cobb Mountain lupine	None/None G2/S2? 1B.2	Broadleaved upland forest, Chaparral, Cismontane woodland, Lower montane coniferous forest. 275 - 1525 m. perennial herb. Blooms Mar-Jun	Not Expected	Suitable habitat and elevation are not present.
<i>Microseris paludosa</i> marsh microseris	None/None G2/S2 1B.2	Closed-cone coniferous forest, Cismontane woodland, Coastal scrub, Valley and foothill grassland. 5 - 355 m. perennial herb. Blooms Apr-Jun(Jul)	Not Expected	Native grasslands are not present. One historic occurrence has been reported within 5 miles (Rincon 2021).
<i>Navarretia leucocephala</i> ssp. <i>bakeri</i> Baker's navarretia	None/None G4T2/S2 1B.1	Cismontane woodland, Lower montane coniferous forest, Meadows and seeps, Valley and foothill grassland, Vernal pools. Mesic. 5 - 1740 m. annual herb. Blooms Apr-Jul	Not Expected	Native grasslands and vernal pools are not present. Five (5) occurrences, three (3) of which are historic, have been reported within 5 miles (Rincon 2021).

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
<i>Navarretia leucocephala</i> ssp. <i>plieantha</i> many-flowered navarretia	FE/SCE G4T1/S1 1B.2	Vernal pools (volcanic ash flow). 30 - 950 m. annual herb. Blooms May-Jun	Not Expected	Vernal pools and suitable soils are not present.
<i>Penstemon newberryi</i> var. <i>sonomensis</i> Sonoma beardtongue	None/None G4T2/S2 1B.3	Chaparral (rocky). 700 - 1370 m. perennial herb. Blooms Apr-Aug	Not Expected	Suitable habitat and elevation are not present.
<i>Plagiobothrys strictus</i> Calistoga popcornflower	FE/SCT G1/S1 1B.1	Meadows and seeps, Valley and foothill grassland, Vernal pools. alkaline areas near thermal springs. 90 - 160 m. annual herb. Blooms Mar-Jun	Not Expected	Suitable habitat and elevation are not present.
<i>Pleuropogon hooverianus</i> North Coast semaphore grass	None/SCT G2/S2 1B.1	Broadleafed upland forest, Meadows and seeps, North Coast coniferous forest. open areas, mesic. 10 - 671 m. perennial rhizomatous herb. Blooms Apr-Jun	Not Expected	Suitable habitat is not present.
<i>Poa napensis</i> Napa blue grass	FE/SCE G1/S1 1B.1	Meadows and seeps, Valley and foothill grassland. alkaline, near thermal springs. 100 - 200 m. perennial herb. Blooms May-Aug	Not Expected	Suitable habitat and elevation are not present.
<i>Potentilla uliginosa</i> Cunningham Marsh cinquefoil	None/None GH/SH 1A	Marshes and swamps. Freshwater, permanent oligotrophic wetlands. 30 - 40 m. perennial herb. Blooms May-Aug	Not Expected	Suitable habitat is not present.
<i>Puccinellia simplex</i> California alkali grass	None/None G3/S2 1B.2BLM_S-Sensitive	Chenopod scrub, Meadows and seeps, Valley and foothill grassland, Vernal pools. Alkaline, vernal mesic; sinks, flats, and lake margins. 2 - 930 m. annual herb. Blooms Mar-May	Not Expected	Suitable habitat and alkaline soils are not present. No occurrences have been reported within 5 miles (Rincon 2021).
<i>Rhynchospora alba</i> white beaked-rush	None/None G5/S2 2B.2	Bogs and fens, Meadows and seeps, Marshes and swamps (freshwater). 60 - 2040 m. perennial rhizomatous herb. Blooms Jun-Aug	Not Expected	Suitable habitat and elevation are not present.
<i>Rhynchospora californica</i> California beaked- rush	None/None G1/S1 1B.1BLM_S-Sensitive	Bogs and fens, Lower montane coniferous forest, Meadows and seeps (seeps), Marshes and swamps (freshwater). 45 - 1010 m. perennial rhizomatous herb. Blooms May-Jul	Not Expected	Suitable habitat and elevation are not present.
<i>Rhynchospora capitellata</i> brownish beaked- rush	None/None G5/S1 2B.2	Lower montane coniferous forest, Meadows and seeps, Marshes and swamps, Upper montane coniferous forest. mesic. 45 - 2000 m. perennial herb. Blooms Jul-Aug	Not Expected	Suitable habitat and elevation are not present.
<i>Rhynchospora globularis</i> round-headed beaked-rush	None/None G4/S1 2B.1	Marshes and swamps (freshwater). 45 - 60 m. perennial rhizomatous herb. Blooms Jul-Aug	Not Expected	Suitable habitat and elevation are not present.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
<i>Sidalcea hickmanii</i> ssp. <i>napensis</i> Napa checkerbloom	None/None G3T1/S1 1B.1	Chaparral. rhyolitic. 415 - 610 m. perennial herb. Blooms Apr-Jun	Not Expected	Suitable habitat and elevation are not present.
<i>Sidalcea oregana</i> ssp. <i>valida</i> Kenwood Marsh checkerbloom	FE/SCE G5T1/S1 1B.1	Marshes and swamps (freshwater). 115 - 150 m. perennial rhizomatous herb. Blooms Jun-Sep	Not Expected	Suitable habitat and elevation are not present.
<i>Spergularia</i> <i>macrotheca</i> var. <i>longistyla</i> long-styled sand- spurrey	None/None G5T2/S2 1B.2	Meadows and seeps, Marshes and swamps. Alkaline. 0 - 255 m. perennial herb. Blooms Feb- May(Jun)	Not Expected	Suitable habitat is not present, and no occurrences have been reported within 5 miles (Rincon 2021).
<i>Trichostema ruygtii</i> <i>Napa bluecurls</i>	None/None 1B.2	Annual herb found in chaparral, cismontane woodland, lower montane coniferous forest, valley foothill grassland, and vernal pools.	Not Expected	Suitable habitat is not present, and no occurrences have been reported within 5 miles (CDFW 2024).
<i>Trifolium amoenum</i> two-fork clover	FE/None G1/S1 1B.1	Coastal bluff scrub, Valley and foothill grassland (sometimes serpentinite). 5 - 415 m. annual herb. Blooms Apr-Jun	Not Expected	Suitable habitat is not present.
<i>Trifolium</i> <i>buckwestiorum</i> Santa Cruz clover	None/None G2/S2 1B.1	Broadleafed upland forest, Cismontane woodland, Coastal prairie. gravelly, margins. 105 - 610 m. annual herb. Blooms Apr-Oct	Not Expected	Suitable habitat and elevation are not present.
<i>Trifolium hydrophilum</i> saline clover	None/None G2/S2 1B.2	Marshes and swamps, Valley and foothill grassland (mesic, alkaline), Vernal pools. 0 - 300 m. annual herb. Blooms Apr-Jun	Not Expected	Native grasslands and vernal pools are not present. Five (5) occurrences, three (3) of which are historic, have been reported within 5 miles in vernal pools and wet meadows (Rincon 2021).
<i>Triquetrella</i> <i>californica</i> coastal triquetrella	None/None G2/S2 1B.2	Coastal bluff scrub, Coastal scrub. soil. 10 - 100 m. moss.	Not Expected	Suitable habitat is not present.
<i>Viburnum ellipticum</i> oval-leaved viburnum	None/None G4G5/S3? 2B.3	Chaparral, Cismontane woodland, Lower montane coniferous forest. 215 - 1400 m. perennial deciduous shrub. Blooms May-Jun	Not Expected	Suitable habitat and elevation are not present.

Regional Vicinity refers to within a 9-quad search radius of site.

FE = Federally Endangered FT = Federally Threatened FC = Federal Candidate Species

SE = State Endangered ST = State Threatened SC = State Candidate SR = State Rare

CRPR (CNPS California Rare Plant Rank)

1A=Presumed Extinct in California

1B=Rare, Threatened, or Endangered in California and elsewhere 2A=Plants presumed extirpated in California, but more common elsewhere

2B=Plants Rare, Threatened, or Endangered in California, but more common elsewhere

CRPR Threat Code Extension

.1=Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat), .2=Fairly endangered in California

(20-80% occurrences threatened), .3=Not very endangered in California (<20% of occurrences threatened)

Special-Status Animal Species in the Regional Vicinity (Nine Quad) of the Study Area

Scientific Name Common Name	Status Fed/State ESA/ CDFW	Habitat Requirements	Potential to Occur	Rationale
Invertebrates				
<i>Bombus crotchii</i> Crotch bumble bee	None/SCE G3G4/S1S2	Coastal California east to the Sierra- Cascade crest and south into Mexico. Food plant genera include <i>Antirrhinum</i> , <i>Phacelia</i> , <i>Clarkia</i> , <i>Dendromecon</i> , <i>Eschscholzia</i> , and <i>Eriogonum</i> .	Not Expected	Suitable host plants are available, however presence in the site is unlikely due to disturbance. No recorded occurrences within 5 miles (Rincon 2021).
<i>Bombus occidentalis</i> western bumble bee	None/SCE G2G3/S1	Once common & widespread, species has declined precipitously from central CA to southern B.C., perhaps from disease.	Not Expected	Suitable host plants are available, however presence in the site is unlikely due to disturbance. One historic occurrence is recorded within 5 miles (Rincon 2021).
<i>Syncaris pacifica</i> California freshwater shrimp	FE/SE G2/S2	Endemic to Marin, Napa, and Sonoma counties. Found in low elevation, low gradient streams where riparian cover is moderate to heavy. Shallow pools away from main streamflow. Winter: undercut banks with exposed roots. Summer: leafy branches touching water.	Not Expected	Suitable riparian habitat is not present.
Fish				
<i>Hesperoleucus venustus</i> <i>navarroensis</i> northern coastal roach	None/None SSC	Small, stout-bodied minnows (cyprinids) generally found in small streams; dense populations are frequently observed in isolated pools. Roach are most abundant in mid-elevation streams in the Sierra Nevada foothills and in lower reaches of some San Francisco Bay streams but they may also be found in the main channels of some rivers, such as the Stanislaus (CDFW 2024)	Not Expected	Suitable aquatic habitats are not present.
<i>Hysterocarpus traskii</i> <i>pomo</i> Russian River tule perch	None/None G5T4/S4 SSC	Low elevation streams of the Russian River system. Requires clear, flowing water with abundant cover. They also require deep (> 1 m) pool habitat.	Not Expected	Suitable aquatic habitats are not present.
<i>Lavinia symmetricus</i> <i>navarroensis</i> Navarro roach	None/None G4T1T2/S2S3 SSC	Habitat generalists. Found in warm, intermittent streams as well as cold, well- aerated streams.	Not Expected	Suitable aquatic habitats are not present.

Scientific Name Common Name	Status Fed/State ESA/ CDFW	Habitat Requirements	Potential to Occur	Rationale
<i>Oncorhynchus kisutch</i> pop. 4 coho salmon - central California coast ESU	FE/SE G4/S2	Federal listing = pops between Punta Gorda & San Lorenzo River. State listing = pops south of Punta Gorda. Require beds of loose, silt- free, coarse gravel for spawning. Also need cover, cool water & sufficient dissolved oxygen.	Not Expected	Suitable aquatic habitats are not present.
<i>Oncorhynchus mykiss irideus</i> pop. 8 steelhead - central California coast DPS	FT/None G5T2T3Q/S2S3	DPS includes all naturally spawned populations of steelhead (and their progeny) in streams from the Russian River to Aptos Creek, Santa Cruz County, California (inclusive). Also includes the drainages of San Francisco and San Pablo Bays.	Not Expected	Suitable aquatic habitats are not present.
Amphibians				
<i>Ambystoma californiense</i> California tiger salamander	FT/ST G2G3/S2S3 WL	Central Valley DPS federally listed as threatened. Santa Barbara and Sonoma counties DPS federally listed as endangered. Need underground refuges, especially ground squirrel burrows, and vernal pools or other seasonal water sources for breeding.	Low	The project site is located within USFWS- designated critical habitat for this species. Marginally suitable habitat is present in ruderal grasslands and drainage ditches within the project site. Adjacent ruderal fields may contain burrows. Seventy (70) occurrences recorded within 5 miles of the project (Rincon 2021).
<i>Dicamptodon ensatus</i> California giant salamander	None/None G3/S2S3 SSC	Known from wet coastal forests near streams and seeps from Mendocino County south to Monterey County, and east to Napa County. Aquatic larvae found in cold, clear streams, occasionally in lakes and ponds. Adults known from wet forests under rocks and logs near streams and lakes.	Not Expected	Suitable aquatic habitats are not present.
<i>Rana boylei</i> foothill yellow- legged frog	None/SE G3/S3 SSC	Partly-shaded, shallow streams and riffles with a rocky substrate in a variety of habitats. Needs at least some cobble-sized substrate for egg-laying. Needs at least 15 weeks to attain metamorphosis.	Not Expected	Suitable aquatic habitats are not present

Scientific Name Common Name	Status Fed/State ESA/ CDFW	Habitat Requirements	Potential to Occur	Rationale
<i>Rana draytonii</i> California red- legged frog	FT/None G2G3/S2S3 SSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	Not Expected	Suitable aquatic habitats are not present
<i>Taricha rivularis</i> red-bellied newt	None/None G4/S2 SSC	Coastal drainages from Humboldt County south to Sonoma County, inland to Lake County. Isolated population of uncertain origin in Santa Clara County. Lives in terrestrial habitats, juveniles generally underground, adults active at surface in moist environments. Will migrate over 1 km to breed, typically in streams with moderate flow and clean, rocky substrate.	Not Expected	Suitable aquatic habitats are not present
Amphibians				

Scientific Name Common Name	Status Fed/State ESA/ CDFW	Habitat Requirements	Potential to Occur	Rationale
<i>Actinemys marmorata</i> northwestern pond turtle	None/None G3G4/S3 SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	Low	Suitable habitat is not present within the site. Ruderal fields to the south of the project site may provide suitable upland habitat. The closest body of water that provides marginally suitable aquatic habitat is the canal that runs north-south, 400 feet (0.12 km) to the east of the project boundary. The SMART rail tracks occur between the steep-sided canal, which has vertical concrete sides to the south of Todd Road, creating a barrier to movement, thus it is unlikely that pond turtles will cross the tracks and enter the project site. Fifteen (15) occurrences recorded within 5 miles, all near streams or ponds without concrete banks (Rincon 2021). Closest recorded occurrence (2004) is 1.65 miles SW of project site, on the east side of Highway 101.
Birds				
<i>Accipiter cooperii</i> Cooper's hawk	None/None G5/S4 WL	Woodland, chiefly of open, interrupted or marginal type. Nest sites mainly in riparian growths of deciduous trees, as in canyon bottoms on river flood plains; also, live oaks.	Low	Trees within the study area and in the vicinity provide suitable nesting habitat, despite the lack of riparian habitat within the site. One occurrence has been recorded, 2.7 miles north of the site (Rincon 2021).

Scientific Name Common Name	Status Fed/State ESA/ CDFW	Habitat Requirements	Potential to Occur	Rationale
<i>Accipiter striatus</i> sharp-shinned hawk	None/None G5/S4 WL	Ponderosa pine, black oak, riparian deciduous, mixed conifer, and Jeffrey pine habitats. Prefers riparian areas. North-facing slopes with plucking perches are critical requirements. Nests usually within 275 ft of water.	Not Expected	Suitable nesting habitat is not present.
<i>Agelaius tricolor</i> tricolored blackbird	None/ST G2G3/S1S2 SSC	Highly colonial species, most numerous in Central Valley & vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few km of the colony.	Not Expected	Suitable nesting habitat is not present.
<i>Ammodramus savannarum</i> grasshopper sparrow	None/None G5/S3 SSC	Dense grasslands on rolling hills, lowland plains, in valleys and on hillsides on lower mountain slopes. Favors native grasslands with a mix of grasses, forbs and scattered shrubs. Loosely colonial when nesting.	Not Expected	Native grasslands and suitable nesting habitat are not present.
<i>Aquila chrysaetos</i> golden eagle	None/None G5/S3 SFP WL	Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.	Not Expected	Suitable nesting habitat is not present, and the site is too small to provide foraging habitat.
<i>Athene cunicularia</i> burrowing owl	None/None G4/S3 SSC	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Not Expected	Suitable nesting habitat and prey base are not present due to the small size and disturbed nature of ruderal areas in the project site.
<i>Buteo regalis</i> ferruginous hawk	None/None G4/S3S4 WL	Open grasslands, sagebrush flats, desert scrub, low foothills and fringes of pinyon and juniper habitats. Eats mostly lagomorphs, ground squirrels, and mice. Population trends may follow lagomorph population cycles.	Not Expected	Suitable wintering habitat is not present.
<i>Coccyzus americanus occidentalis</i> western yellow-billed cuckoo	FT/SE G5T2T3/S1 WL	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	Not Expected	Suitable nesting habitat is not present.
<i>Coturnicops noveboracensis</i> yellow rail	None/None G4/S1S2 SSC WL	Summer resident in eastern Sierra Nevada in Mono County. Freshwater marshlands.	Not Expected	Suitable habitat is not present.

Scientific Name Common Name	Status Fed/State ESA/ CDFW	Habitat Requirements	Potential to Occur	Rationale
<i>Elanus leucurus</i> white-tailed kite	None/None G5/S3S4 SFP	Rolling foothills and valley margins with scattered oaks & river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	Not Expected	Suitable nesting habitat is not present.
<i>Eremophila alpestris actia</i> California horned lark	None/None G5T4Q/S4 WL	Coastal regions, chiefly from Sonoma County to San Diego County; also main part of San Joaquin Valley and east to foothills. Short-grass prairie, bald hills, mountain meadows, open coastal plains, fallow grain fields, alkali flats.	Not Expected	Suitable nesting habitat is not present in the project site. No occurrences recorded within 5 miles (Rincon 2021).
<i>Falco peregrinus anatum</i> American peregrine falcon	FD/SD G4T4/S3S4 SS SFP	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.	Not Expected	Suitable nesting habitat is not present.
<i>Pandion haliaetus</i> osprey	None/None G5/S4 SS WL	Ocean shore, bays, freshwater lakes, and larger streams. Large nests built in tree- tops within 15 miles of a good fish- producing body of water.	Not Expected	Suitable nesting habitat is not present.
<i>Riparia</i> bank swallow	None/ST G5/S2	Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.	Not Expected	Suitable nesting habitat is not present.
Mammals				
<i>Antrozous pallidus</i> pallid bat	None/None G5/S3 SSC WBWG_H- High Priority	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	Not Expected	Suitable roost habitats are not present. No occurrences are recorded with 5 miles of the site (Rincon 2021).
<i>Corynorhinus townsendii</i> Townsend's big- eared bat	None/None G3G4/S2 SSC WBWG_H- High Priority	Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	Not Expected	Suitable roost habitats are not present. No occurrences are recorded with 5 miles of the site (Rincon 2021).

Scientific Name Common Name	Status Fed/State ESA/ CDFW	Habitat Requirements	Potential to Occur	Rationale
<i>Lasiurus blossevillii</i> western red bat	None/None G5/S3 CDFW_SSC- Species of Special Concern IUCN_LC- Least Concern WBWG_H-High Priority	Roosts primarily in trees, 2-40 ft above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	Not Expected	Suitable roost habitats are not present. No occurrences are recorded within 5 miles of the site (Rincon 2021).
<i>Taxidea taxus</i> American badger	None/None G5/S3 CDFW_SSC- Species of Special Concern IUCN_LC- Least Concern	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Not Expected	Suitable habitats are not present.

Regional Vicinity refers to within a 9-quadrant search radius of site.

FE = Federally Endangered FT = Federally Threatened FC = Federal Candidate Species FS = Federally Sensitive SE = State Endangered
ST = State Threatened SCE = State Candidate SS = State Sensitive
SSC = CDFW Species of Special Concern SFP = State Fully Protected WL = State Watch List

Appendix C

Mitigation Monitoring and Reporting Plan (MMRP)

Mitigation Monitoring and Reporting Program Todd Road and Standish Avenue Intersection Improvements Project

State Clearinghouse Number: 2025091118

CEQA Lead Agency: Sonoma County Public Infrastructure

Public Circulation: 24 September 2025 through 23 October 2025

Introduction

California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Public Resource Code (PRC) Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies “to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment.” A Mitigation Monitoring and Reporting Program (MMRP) is required for the proposed Todd Road and Standish Avenue Intersection Improvements Project because the mitigated negative declaration (MND) identifies potential significant adverse impacts related to the project implementation, and mitigation measures have been identified to reduce those impacts. Adoption of the MMRP would occur along with adoption of the Final MND and approval of the Proposed Project

Purpose of Mitigation Monitoring and Reporting Program

This MMRP has been prepared to ensure that all required mitigation measures are implemented and completed in a satisfactory manner. A table is attached to assist the responsible parties in implementing the mitigation measures. The table identifies the impact, mitigation measures, monitoring responsibility, mitigation timing, and provides space for written verification of the mitigation measures. The numbering of mitigation measures follows the numbering found in the MND. Mitigation measures that are referenced more than once in the MND are not duplicated in the MMRP table.

In addition to the environmental mitigation measures detailed in the Final MND and listed in the MMRP, a set of pertinent best management practices (BMPs) applicable to Proposed Project construction are part of the Project Description in the Final MND.

Roles and Responsibilities

Unless specified otherwise, Sonoma County Public Infrastructure is responsible for the implementation and verification of the mitigation measures under its jurisdiction.

Please direct inquiries to:

Olguin P. Caban, Assistant Engineer
Sonoma County Public Infrastructure
400 Aviation Blvd. Suite 100
Santa Rosa, CA 95403
Olguin.Caban@sonomacounty.gov

Reporting

Sonoma County shall document and describe compliance with the required mitigation measures either within the attached table or separate monitoring documentation.

Modifications

After review and approval of the final MMRP by the CEQA Lead Agency (the County), minor changes and modifications to the MMRP are permitted, but can only be made by the County. The County, in conjunction with any appropriate agencies, or departments, will determine the adequacy of any proposed change or modification. The flexibility is necessary in light of the nature of the MMRP, and the need to protect the environment with a workable program. No changes will be permitted unless the MMRP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

Mitigation Monitoring and Reporting Program Table

The MMRP table below includes the following categories:

- **Impact:** Column lists each significant impact, by resource topic, that is identified in the MND and for which mitigation measures are required.
- **Mitigation Measure:** Column provides the full text of each mitigation measure identified in the MND.
- **Implementation Responsibility:** Column identifies the party responsible for implementation of the mitigation measures.
- **Timing:** Column defines the time or project phase at which the mitigation measure will be implemented.
- **Outside Agency/ Consulting Party Coordination:** Column identifies possible outside agency or other consulting party coordination that may be needed.
- **Verification:** Column to be signed and dated by the person (either project manager or their designee) responsible for verifying implementation/ compliance with the requirements of the mitigation measure.

Impact	Mitigation Measure	Implementaion Responsibility	Timing	Potentail Outside Agency/ Consulting Party Coordination	Verification
<p>Biological Resources</p>					
<p>The proposed project has potential to result in direct impacts to congested-headed hayfield tarplant if present in the disturbance footprint. Removal of congested-headed hayfield tarplant would be considered a significant impact.</p>	<p>Mitigation Measure BIO-1: Congested-headed hayfield tarplant</p> <ul style="list-style-type: none"> • A properly timed survey for special status plant including congested-headed hayfield tarplant will be conducted prior to initial construction activities. The survey will be conducted in accordance with standard survey protocols (CDFW 2018; CNPS 2001), as applicable. • If no sensitive plant species are detected during the botanical survey, no further avoidance and minimization efforts are required. • If special status plant species are identified, they will be included in an Environmentally Sensitive Area non-disturbance buffer, which will be determined by a qualified botanist. The plant(s) will be clearly delineated using high-visibility orange fencing, which will be installed prior to initial vegetation clearing. Vehicles will not be allowed to park in, nor will equipment be stored in, the Environmentally Sensitive Area, nor will oil, gasoline, or other substances storage be permitted. No vegetation removal or ground-disturbing activities will be permitted in the Environmentally Sensitive Area. The Environmentally Sensitive Area fencing will remain in place throughout the duration of project construction and will be regularly inspected and fully maintained. • If rare plant populations cannot be protected in place, the County or its designee will prepare a transplantation/propagation plan for the relocation of the rare plant(s). Rare plant relocation will occur in a suitable 	<p>Sonoma County</p>	<p>Pre-Construction and Construction</p>	<p>CDFW if transplantation /propagation plan needed</p>	

Impact	Mitigation Measure	Implementaion Responsibility	Timing	Potentail Outside Agency/ Consulting Party Coordination	Verification
	area of the project area. The transplantation/propagation plan will be sent to CDFW.				
While unlikely, if present, individuals could be harassed, injured, or killed by collision with construction equipment or the removal of milkweed plants if occupied by monarch butterfly eggs. Take of monarch butterfly would be a significant impact.	<p>Mitigation Measure BIO-2: Monarch butterfly</p> <ul style="list-style-type: none"> • A qualified biologist will conduct a survey for milkweed species (monarch breeding host plant) in areas to be used for construction and staging as well as a 20 ft buffer (if accessible). If no milkweed species are detected, then no further avoidance or minimization is needed. • If milkweed weed species are identified they will be mapped and inspected for the presence of monarch butterfly eggs, larvae, and chrysalides (pupa, protective covering). If no monarch butterfly eggs, larvae, or chrysalides are found on the milkweed, then no further avoidance or minimization is needed. • If monarch butterfly eggs, larvae, and chrysalides are found a minimum 10 foot radius avoidance buffer will be established around the occupied plant with flagging and or temporary fencing. The avoidance buffer will remain in place until such time as the qualified biologist determines that eggs, larvae, and or chrysalides are no longer occupying the plant(s) or USFWS has provide further direction. 	Sonoma County	Pre-Construction and Construction	USFWS as provided for in the mitigation measure	
Impacts would occur through removal of trees and vegetation if active nests are present. Impacts would also occur if active nests are present in	<p>Mitigation Measure BIO-3: Cooper's hawk & Nesting Birds and Raptors</p> <ul style="list-style-type: none"> • To avoid disturbance of nesting and special-status birds including raptorial species protected by the MBTA and Sections 3503, 3503.5, and 3513 of the CFGC, activities related to the proposed project, including, but not limited to, vegetation removal, ground disturbance, and construction shall occur outside of the bird breeding season. For construction activities occurring during the nesting season 	Sonoma County	Pre-Construction and Construction	None	

Impact	Mitigation Measure	Implementaion Responsibility	Timing	Potentail Outside Agency/ Consulting Party Coordination	Verification
undeveloped and landscaped areas adjacent to active construction or staging through disturbance and nest abandonment.	(generally February 1 to August 31), surveys for nesting birds covered by the MBTA and CFGC shall be conducted by a qualified biologist no more than 14 days prior to initiation of construction activities for the intersection improvements, including construction staging and vegetation removal. The surveys shall include the entire disturbance areas plus a 200-foot buffer around any disturbance areas. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The biologist shall have full discretion for establishing a suitable buffer. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed, and young have fledged the nest prior to removal of the buffer.				
Cultural Resources					
If human remains are discovered the impact would be potentially significant.	<p>Mitigation Measure CUL-1</p> <p>In the event of discovery of archeological resources and/or human remains within the project site, adherence to the following requirements shall be implemented to avoid disturbance or damage to archeological resources or human remains. The County of Sonoma Municipal Code (Chapter 11 as amended by Ordinance No. 6338) establishes the following County requirements for the protection of archaeological resources and human remains discovered during construction grading and drainage:</p> <p>All work shall be halted in the vicinity of the find, the Director of Public Infrastructure or his or her authorized representative</p>	Sonoma County	Construction	NAHC, SHPO, NW Information Center, County coroner	

Impact	Mitigation Measure	Implementaion Responsibility	Timing	Potentail Outside Agency/ Consulting Party Coordination	Verification
	<p>(director) shall be notified, and the following shall occur before work may be resumed:</p> <ul style="list-style-type: none"> • Human Remains. If human remains or suspected human remains are discovered, the permittee shall notify the county coroner and comply with all state law requirements, including Health and Safety Code section 7050.5 and Public Resources Code section 5097.98, to ensure proper disposition of the human remains or suspected human remains, including those identified to be Native American remains. • Archaeological Resources. If archaeological resources or suspected archaeological resources are discovered, the director shall notify the State Historic Preservation Officer and the Northwest Information Center at Sonoma State University, and the permittee shall retain a qualified archeologist to evaluate the find to ensure proper disposition of the archaeological resources or suspected archaeological resources. All costs associated with the evaluation and mitigation of the find shall be the responsibility of the permittee. The director shall provide notice of the find to any tribes that have been identified as having cultural ties and affiliation with the geographic area in which the archaeological resources or suspected archaeological resources were discovered if the tribe or tribes have requested notice and provided a contact person and current address to which the notice is to be sent. The director shall consult with and solicit comments from notified tribes to aid in the evaluation, protection, and proper disposition of the archaeological resources or suspected archaeological resources. The need for confidentiality of information concerning the archaeological resources or suspected archaeological resources shall be recognized by all parties. For the purposes of this section, archaeological resources include historic or prehistoric ruins, burial 				

Impact	Mitigation Measure	Implementaion Responsibility	Timing	Potentail Outside Agency/ Consulting Party Coordination	Verification
	<p>grounds, pottery, arrowheads, midden, or culturally modified soil deposits. Artifacts associated with prehistoric ruins include humanly modified stone, shell, bone, or other cultural materials such as charcoal, ash, and burned rock indicative of food procurement or processing activities. Prehistoric domestic features include hearths, fire pits, or floor depressions; mortuary features are typically represented by human skeletal remains. (Ord. No. 6338, Exhibit B (12-15-2020))</p> <p>If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD has 48 hours to make recommendations for the disposition of the remains. The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance.</p>				
Geology and Soils					
While highly unlikely, previously unknown paleontological resources could be encountered	<p>Mitigation Measure GEO-1</p> <ul style="list-style-type: none"> In the event a previously unknown fossil is uncovered during project construction, all work shall cease until a certified paleontologist can investigate the find and make appropriate recommendations. The qualified paleontologist shall determine the significance of the discovery and 	Sonoma County	Construction	Certified Paleontologist	

Impact	Mitigation Measure	Implementaion Responsibility	Timing	Potentail Outside Agency/ Consulting Party Coordination	Verification
during construction activities. This is a potentially significant impact.	identify whether additional mitigation or treatment is warranted. Measures may include testing, data recovery, reburial, archival review and/or transfer to the appropriate museum or educational institution. All testing, data recovery, reburial, archival review or transfer to research institutions related to monitoring discoveries shall be determined by the qualified paleontologist and shall be reported to the County. Work in the area of the discovery will resume once the find is properly documented and authorization is given to resume construction work.				
Hazards and Hazardous Materials					
Project construction activities that disturb soils on-site could potentially result in the release of hazardous materials associated with agricultural chemicals and ADL into the environment. These conditions could result in a potentially significant impact.	<p>Mitigation Measure HAZ-1 Phase II ESA</p> <ul style="list-style-type: none"> • A Phase II ESA, conforming to the recommended guidelines established by the American Society for Testing and Materials in Standard E1903-11, shall be conducted prior to the start of project demolition and construction activities. The Phase II ESA shall include the collection of shallow soil samples to be analyzed for lead, organochlorine pesticides, and arsenic at the project site. The Phase II ESA shall provide recommendations to address identified hazards and indicate when to apply those recommended actions in relation to proposed project activities. As part of the Phase II ESA, analytical results will be screened against the North Coast Regional Water Quality Control Board environmental screening levels (ESL). These ESLs are risk-based screening levels for direct exposure of a construction workers. • If contaminants are detected at the project site, appropriate steps shall be undertaken to protect site workers during project construction and if necessary, the public during 	Sonoma County	Pre-demolition/ Pre-construction	None	

Impact	Mitigation Measure	Implementaion Responsibility	Timing	Potentail Outside Agency/ Consulting Party Coordination	Verification
	<p>project operation. This would include the preparation of a Soil Management Plan (see Mitigation Measure HAZ-2).</p> <ul style="list-style-type: none"> • If contaminants are detected at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24 Characteristics of Toxicity), appropriate steps shall be undertaken to protect site workers during project construction and if necessary, the public during project operation (see Mitigation Measure HAZ-3). 				
<p>Project construction activities that disturb soils on-site could potentially result in the release of hazardous materials associated with agricultural chemicals and ADL into the environment. These conditions could result in a potentially significant impact.</p>	<p>Mitigation Measure HAZ-2 Soil Management Plan for Impacted Soils</p> <p>If impacted soils are present onsite, a Soil Management Plan (SMP) or equivalent document shall be prepared by a qualified environmental consultant to address onsite handling and management of soils and reduce hazards to construction workers and offsite receptors. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. These measures and practices may include, but not be limited to:</p> <ul style="list-style-type: none"> • Stockpile management including dust control, sampling, stormwater pollution prevention and the installation of BMPs • Proper disposal procedures of contaminated materials • Monitoring and reporting • A health and safety plan for each contractor working at the site that addresses the safety and health hazards of each phase of site operations with the requirements and procedures for employee protection 	<p>Sonoma County</p>	<p>Pre-demolition/ Pre-construction</p>	<p>None</p>	

Impact	Mitigation Measure	Implementaion Responsibility	Timing	Potentail Outside Agency/ Consulting Party Coordination	Verification
	<ul style="list-style-type: none"> The health and safety plan will also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction. 				
<p>Project construction activities that disturb soils on-site could potentially result in the release of hazardous materials associated with agricultural chemicals and ADL into the environment. These conditions could result in a potentially significant impact.</p>	<p>Mitigation Measure HAZ-3 Remediation</p> <ul style="list-style-type: none"> If soil present onsite contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), additional analytical testing will be required to determine the soil waste categorization. If analytical testing indicates that hazardous waste soils are present in the disturbed areas of the proposed project, the impacted soils shall be removed and disposed properly. Remediation of impacted soils may require additional delineation of impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and offsite disposal or recycling. 	Sonoma County	Pre-demolition/ Pre-construction/ Construction	None	
<p>Construction activities may involve the use, storage, and transport of hazardous materials within approximately 0.13 mile of the New Directions School. These conditions</p>	<p>Implementation of Mitigation Measure HAZ-1 (Phase II ESA) and Mitigation Measure HAZ-3 (Remediation) reduce impact to less than significant</p>	Sonoma County	Pre-demolition/ Pre-construction/ Construction	None	

Impact	Mitigation Measure	Implementaion Responsibility	Timing	Potentail Outside Agency/ Consulting Party Coordination	Verification
could result in a potentially significant impact.					
The properties at 3665 Standish Avenue and 260 Todd Road are hazardous material cleanup sites due to leaking underground storage tank sites (USTs). The onsite USTs are considered a potential recognized environmental condition.	Implementation of Mitigation Measure HAZ-1 (Phase II ESA) reduces the impact to less than significant	Sonoma County	Pre-demolition/ Pre-construction	None	
Noise					
Construction noise would be significant if construction operations exceed 86 dBA at 50 feet at any time during the day and construction noise impacts could be significant if conducted during	Mitigation Measure NOI-1 <ul style="list-style-type: none"> • Commence any particularly noisy part of the construction activity (such as masonry sawing or jack hammering) after 9 a.m.; • Locate noise-generating equipment or processes so that their impact on neighboring premises is minimized by increasing distance between source and receiver or using intervening structures/barriers; • Shut or throttle equipment down whenever not in actual use; 	Sonoma County	Construction	None	

Impact	Mitigation Measure	Implementaion Responsibility	Timing	Potentail Outside Agency/ Consulting Party Coordination	Verification
the nighttime hours.	<ul style="list-style-type: none"> • Ensure that noise reduction devices such as mufflers are fitted and operating effectively; • Ensure that equipment is not operated if maintenance or repairs would eliminate or significantly reduce a characteristic of noise resulting from its operation that is audible at noise-affected premises; • Where noise levels may expose residentially-zoned property to construction noise levels that exceeds 86 dBA at 50 feet, implement a temporary sound barrier and/or sound blanket that would break the line of sight between the construction equipment and the affected receiver(s); and • Operate equipment and handle materials to minimize impact noise (such as avoiding dropping materials from height). 				
Tribal Cultural Resources					
Because the proposed project involves ground disturbance, there is the possibility of encountering undisturbed subsurface tribal cultural resources during construction. Therefore, the proposed project could result in potentially significant impacts	Implementation of Mitigation Measure CUL-1 (Phase II ESA) reduces the impact to less than significant	Sonoma County	Construction	NAHC, SHPO, NW Information Center, County coroner	

Impact	Mitigation Measure	Implementaion Responsibility	Timing	Potentail Outside Agency/ Consulting Party Coordination	Verification
to tribal cultural resources.					

Appendix D

Response to Comments

Response to Comments

Todd Road and Standish Avenue Intersection Improvements Project

State Clearinghouse Number: 2025091118
CEQA Lead Agency: Sonoma County Public Infrastructure
Public Circulation: 24 September 2025 through 23 October 2025

List of Comments Received

One (1) comment letter was received. The table below lists the names of the individuals, organizations, and agencies that provided comments on the environmental document. The comment letter is included followed by a response to the comment(s). The individual comments in the letter have been numbered.

Comment Letter Received

Commenter
California Department of Fish & Wildlife (CDFW)

Responses to Comments

California Department of Fish & Wildlife (CDFW)



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



October 21, 2025

Olguin Caban, Assistant Engineer
Sonoma County Public Infrastructure
400 Aviation Boulevard, Suite 100
Santa Rosa, CA 95403
Olguin.Caban@sonomacounty.gov

Subject: Todd Road and Standish Avenue Intersection Improvements Project,
Mitigated Negative Declaration, SCH No. 2025091118, Sonoma County

Dear Olguin Caban:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) from Sonoma County Public Infrastructure (County) for the Todd Road and Standish Avenue Intersection Improvements Project (project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

CDFW is submitting comments on the MND to inform the County, as the Lead Agency, of our concerns regarding potentially significant impacts to biological resources associated with the project.

CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under CEQA (Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), Lake and Streambed Alteration Program, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

PROJECT DESCRIPTION SUMMARY

Proponent: Sonoma County Public Infrastructure

Objective: The project proposes to improve the intersection of Todd Road at Standish Avenue to meet current Sonoma County standards and signalize the intersection to facilitate current and projected traffic movements including large truck traffic. The project would involve roadway excavation at the intersection to connect power to the

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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new traffic signal mast arms and new drainage inlets to connect with the existing and/or relocated storm drain lines. The drainage improvements would occur within the existing right-of-way and the project improvement limits.

Location: The 2.66-acre project site is located at the intersection of Todd Road and Standish Avenue in unincorporated Sonoma County south of the City of Santa Rosa, in Sections 2, 3, 10, and 11, Township 6 North, Range 8 West as depicted on the Mount Diablo Meridian Santa Rosa U.S. Geological Survey 7.5' quadrangle map, on Assessor's Parcel Numbers 134-102-070, 134-102-071, 134-102-084, 134-102-014, 134-171052, 134-171-049, 134-171-050, 134-171, and at approximately Latitude 38.38718 °N, Longitude 122.72294 °W.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the project. **The project has the potential to result in take of California tiger salamander (*Ambystoma californiense*), which is CESA listed as threatened, and Sonoma sunshine (*Blennosperma bakeri*), Sebastopol meadowfoam (*Limnanthes vinculans*), and Burke's goldfields (*Lasthenia burkei*), which are CESA listed as endangered species, and burrowing owl (*Athene cunicularia*), which is a CESA candidate species, as further described below.** Issuance of a CESA ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the project will impact CESA listed species, early consultation is encouraged, as significant modification to the project and mitigation measures may be required in order to obtain a CESA ITP.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 15065.). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the project proponent's obligation to comply with CESA.

Raptors and Other Nesting Birds

CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding

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the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the project's avoidance of significant impacts on biological resources with implementation of mitigation measures, including those CDFW recommends below, CDFW concludes that an MND is appropriate for the project. **Attachment 1** includes CDFW's recommended mitigation measures in a Draft Mitigation Monitoring and Reporting Program.

- 1. Mandatory Findings of Significance: Does the project have the potential to substantially reduce the number or restrict the range of a rare or endangered plant or animal?***

Comment 1

COMMENT 1: Mitigated Negative Declaration Pages 25-26, California Tiger Salamander, Environmental Setting and Related Impact Shortcoming

- 1. Issue:** The MND states that the project site contains ruderal vegetation and bare ground which may represent suitable upland habitat for California tiger salamander, but that impacts to California tiger salamander would not occur because the project site does not include pavement widening activities and will not alter the existing drainages within the project site. However, the MND also states that project improvements will occur on the dirt/gravel road shoulder and previously disturbed areas. California tiger salamander may utilize previously disturbed areas containing ruderal vegetation. Based on Google Earth aerial imagery, it appears that the project site overlaps with the edges of grassland habitat which contains ruderal vegetation. The project site is also within critical habitat for California tiger salamander, as designated by the U.S. Fish and Wildlife Service (USFWS). California tiger salamander breeding habitat has been documented near the project site, including at the Zero Todd Road project (38.390407, -122.729798) approximately 700 feet west of the project site (California Natural Diversity Database [CNDDDB] Occurrence Number 78) and along Ghilotti Avenue approximately 400 feet south of the project site (CNDDDB Occurrence Number 33), which are within the 1.3-mile dispersal distance for California tiger salamander.

The 2021 Biological Resources Assessment (BRA) referenced in the MND states "... (CTS) may move through the drainage ditches within the study area during migration from breeding to estivation areas or during dispersal. The project would include installation of silt fencing at the limits of construction as indicated on the project site plans and project description to prevent construction impacts to ditches

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and adjacent uplands and prevent CTS from entering the project site. Therefore, no impacts to CTS would occur.” However, typical silt fencing is not specifically designed to exclude California tiger salamander which could enter the project site during dispersal through holes in the silt fencing or through burrows that extend under silt fencing.

In addition, California tiger salamander may breed in drainage ditches with suitable hydroperiods, which can be as short as 8 weeks (O’Brien and Helm 2025). The BRA states “it cannot be definitively determined if water remains in these areas for a sufficient amount of time.” Therefore, the drainage ditch may have a sufficient hydroperiod for California tiger salamander breeding and isolating the ditch during project construction could prevent California tiger salamander successful breeding.

Specific impacts and why they may occur and be significant: The MND is unclear as to whether the project will impact suitable California tiger salamander habitat. If the project would directly impact suitable California tiger salamander habitat, the project may result in injury to or mortality of California tiger salamander from ground-disturbing activities within potential California tiger salamander upland habitat on the project site. The project may also result in indirect impacts to potential breeding habitat, as a result of potential hydrologic modifications to the drainage ditch, and prevent successful California tiger salamander breeding if the drainage ditch has a suitable hydroperiod. California tiger salamander is a CESA listed as threatened species, and is federally listed as endangered in Sonoma County (Sonoma County Distinct Population Segment). California tiger salamander is considered threatened under CEQA pursuant to CEQA Guidelines section 15380. Therefore, if California tiger salamander are present on or directly adjacent to the project site or if indirect impacts to breeding habitat occur as a result of the project, the project may substantially reduce the number or restrict the range of this species, which would be a *mandatory finding of significance* pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommended Mitigation Measure: For an adequate environmental setting and to reduce impacts to California tiger salamander to less-than-significant and comply with CESA, CDFW recommends that the MND include: 1) a thorough analysis of the potential for California tiger salamander to occur within the project site considering the information provided above, and 2) the below mitigation measures.

MM-BIO-1. Prior to project construction, the project shall: 1) prepare a figure based on current aerial imagery clearly outlining the project impact area and where it overlaps with or is adjacent to potential CTS upland or breeding habitat, 2) provide the figure to CDFW, and 3) obtain CDFW’s written approval of the figure. If direct or indirect impacts to California tiger salamander habitat occur as a result of the project, prior to project construction, the project shall obtain a CESA ITP from CDFW and comply with the ITP. The project shall obtain authorization

Comment 1

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Comment 1

from the USFWS for impacts to California tiger salamander and comply with the authorization. The project shall also provide habitat compensation for California tiger salamander in accordance with the ITP and Santa Rosa Plain Conservation Strategy (Strategy). Please note that the CESA ITP habitat compensation requirements are often consistent the Strategy but may differ based on site specific conditions.

MM-BIO-2. If impacts adjacent to California tiger salamander habitat would occur as a result of the project, and impacts to California tiger salamander habitat would be avoided, the project shall prepare a California tiger salamander Avoidance Plan (plan) in consultation with CDFW, include CDFW's input in the plan, and implement it.

COMMENT 2: Mitigated Negative Declaration Page 24, California Endangered Species Act-listed Plants, Environmental Setting and Related Impact Shortcoming

Comment 2

Issue: The MND does not clearly state if suitable habitat for CESA-listed plants occurs within or adjacent to the project site. The project site includes drainage ditches but the MND does not specify if wetlands are present within the ditches. According to the BRA, vegetation in the drainage ditches includes broadleaf cattail (*Typha latifolia*), which occurs in wetlands. Sebastopol meadowfoam and Burke's goldfields are known to occur in drainage ditches (USFWS 2016). While the MND states that these ditches will be avoided, the MND does not address potential indirect impacts to seasonal wetlands, such as modification of hydrologic conditions, or construction related sedimentation into occupied wetland habitat, that may result in impacts to Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields. Sonoma sunshine is documented to occur 930 feet southwest of the project site (CNDDDB Occurrence Number 17). Sebastopol meadowfoam is documented to occur 1,150 feet southwest of the project site (CNDDDB Occurrence Number 14). As such, it is possible that indirect impacts as a result of the project may result in impacts to the above CESA-listed plants.

Specific impacts and why they may occur and be significant: Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields may be indirectly impacted by the project due to potential modification of hydrological conditions of the ditch which may contain occupied wetland habitat, construction related sedimentation into occupied wetland habitat, or other factors affecting any on-site or off-site occurrences of these species, resulting in unevaluated and unmitigated mortality of individuals. Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields are CESA and federally listed as endangered species. These species are considered endangered under CEQA pursuant to CEQA Guidelines section 15380. Therefore, if they are present adjacent to the project site where they would be indirectly impacted, the project may substantially reduce the number or restrict the range of these species, which would

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be a *mandatory finding of significance* pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommended Mitigation Measure: For an adequate environmental setting and to reduce impacts to Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields to less-than-significant and comply with CESA, CDFW recommends that the MND include the following mitigation measure in the MND.

MM-BIO-3. Prior to ground disturbance, the project shall submit a wetland assessment and an evaluation of potential direct and indirect impacts to any on-site or adjacent off-site wetland habitat, such as modification of hydrological conditions or construction related sedimentation into occupied wetland habitat, to CDFW for review and obtain CDFW's written acceptance of the assessment and evaluation.

If direct or indirect impacts to potentially suitable wetlands may occur, the project shall submit to CDFW two years of completed botanical survey results and obtain CDFW's written approval of the results prior to project construction. The botanical survey results should follow CDFW's 2018 Protocols for *Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities* (<https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants>) and the Santa Rosa Plain Conservation Strategy, Appendix D: *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain* (<https://www.fws.gov/library/collections/santa-rosa-plain-conservation-strategy>). If CDFW is unable to accept the survey results, the project shall conduct additional surveys prior to initiation of project activities or may assume presence of Sonoma sunshine, Burke's goldfields, and Sebastopol meadowfoam. Please be advised that for CDFW to accept the results, they should be completed in conformance with the above survey protocols and guidelines, including, but not limited to conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts such as altering off-site hydrological conditions where the above species may be present. Surveys should include the entire extent of any directly or indirectly impacted suitable wetland habitat, including portions of the wetland on adjacent parcels or not directly impacted, as impacts to part of a wetland often affects the entire wetland. Evaluation of indirect impacts may necessitate a thorough hydrological assessment that fully analyzes existing and post-project conditions to seasonal wetland habitat. Surveys conducted during drought conditions may not be acceptable. If the botanical surveys result in the detection of the above CESA listed plants that may be impacted by the project, or the presence of these species is assumed, the project shall obtain a CESA ITP from CDFW prior to construction and comply with all requirements of the ITP including, but not limited to providing habitat compensation. In addition, the project shall consult with the USFWS for any impacts to suitable habitat for plants listed under the federal

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Endangered Species Act (ESA) (e.g., wetlands) and provide compensatory habitat mitigation as required.

II. Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS?

COMMENT 3: Mitigated Negative Declaration Page 28, Burrowing Owl, Environmental Setting and Related Impact Shortcoming

Issue: The MND does appropriately evaluate potential impacts to burrowing owl, which have been documented within 2.6 miles of the project site (CNDDDB Occurrence Number 2172). The project is within the wintering range of burrowing owl and based on aerial imagery appear to be within or adjacent to potentially suitable habitat for the species.

Specific impacts and why they may occur and be significant: The project may impact wintering burrowing owl utilizing burrows or burrow surrogates on or within up to 1,640 feet of the project site. The project could result in injury or mortality of adults and permanent wintering (i.e., non-nesting) habitat loss. Burrowing owl is a candidate species for CESA listed as threatened because the species' population viability and survival are adversely affected by risk factors such as precipitous declines from habitat loss, fragmentation, and degradation; evictions from nesting sites without habitat mitigation; wind turbine mortality; human disturbance; and eradication of California ground squirrels resulting in a loss of suitable burrows required by burrowing owl for nesting, protection from predators, and shelter (Shuford and Gardali 2008; Department of Fish and Game Staff Report on Burrowing Owl Mitigation (2012); personal communication, CDFW Statewide Burrowing Owl Coordinator Esther Burkett, May 13, 2022). Information indicates a decline in burrowing owl range over time, burrowing owl has experienced population declines in regions of California and threats to burrowing owl, coupled with long-term population declines, suggest a high degree and immediacy of threat to burrowing owl in California (CDFW 2024). Based on the foregoing, if burrowing owl are wintering on or within up to 1,640 feet of the project site, project impacts to burrowing owl would be potentially significant.

Recommended Mitigation Measure: For an adequate environmental setting and to reduce potential impacts to burrowing owl to less-than-significant and comply with CESA and Fish and Game Code section 3503 et seq., CDFW recommends including the below mitigation measures in the MND.

MM-BIO-4. If the project occurs during the burrowing owl wintering season from September 1 to January 31, prior to project activities a Qualified Biologist shall conduct a burrowing owl habitat assessment within 1,640 feet of the project area

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pursuant to the California Department of Fish and Game (now CDFW) 2012 Staff Report on Burrowing Owl Mitigation (CDFW 2012 Staff Report, available here: <https://wildlife.ca.gov/Conservation/Survey-Protocols#377281284-birds>), unless otherwise approved in writing by CDFW. The Qualified Biologist shall have a minimum of two years of experience implementing the CDFW 2012 Staff Report habitat assessment and survey methodology. The habitat assessment shall focus on searching the California Natural Diversity Database and potentially other sources for any burrowing owl records on or within one mile of the project area, vegetation type and height, suitable burrows (with an opening of greater than 11 centimeters [cm] in diameter and a depth of greater than 150 cm), burrow surrogates (culverts, piles of concrete rubble, piles of soil, burrows created along soft banks of ditches and canals, pipes, and similar structures), and presence of burrowing owl sign (tracks, molted feathers, cast pellets, prey remains, egg shell fragments, owl white wash, and nest burrow decoration material), and the presence of burrowing owl individuals or pairs. If the habitat assessment does not identify suitable habitat and surveys are not conducted as described below, an additional habitat assessment shall be conducted within 14 days prior to construction and if new potentially suitable burrowing owl refugia are present surveys shall be conducted as described below, unless otherwise approved in writing by CDFW. The results of the habitat assessment shall be emailed to CDFW and the project shall obtain CDFW's written approval of the habitat assessment prior to starting project activities.

If suitable burrowing owl habitat is observed, four surveys shall be conducted to detect the presence of burrowing owl pursuant to the CDFW 2012 Staff Report. Surveys should begin August 1. The site visits shall be spread evenly throughout the non-breeding season, unless otherwise approved in writing by CDFW. The survey results shall be emailed to CDFW and the project shall obtain CDFW's written approval of the survey results prior to starting project activities. In addition, a survey shall be completed within 14 days prior to the start of construction, as described in the CDFW 2012 Staff Report. Time lapses of more than 14 days between project activities may trigger subsequent surveys including, but not limited to a final survey conducted within 24 hours prior to ground disturbance.

If burrowing owl is detected, the project shall immediately notify CDFW. The project shall avoid impacts to the burrowing owl and implement a 1,640-foot buffer area around the owl site in which no project activities shall occur, unless otherwise approved in writing by CDFW. A Qualified Biologist or Biological Monitor shall monitor any detected owl to ensure it is not disturbed.

If the surveys result in the detection of the burrowing owl that may be impacted by the project, or the presence of this species and impacts to it are assumed, the project shall obtain a CESA ITP from CDFW prior to construction and comply with

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all requirements of the ITP including, but not limited to providing habitat compensation.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during project surveys to CNDDDB. The CNDDDB field survey form can be filled out and submitted online at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:

<https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

The project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist the County in identifying and mitigating project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Nick Wagner, Senior Environmental Scientist (Specialist), at (707) 428-2075 or Nicholas.wagner@wildlife.ca.gov; or Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or Melanie.Day@wildlife.ca.gov.

Sincerely,

DocuSigned by:

B77E9A6211EF486...
Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1: Draft Mitigation Monitoring and Reporting Program

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ec: Office of Land Use and Climate Innovation (SCH No. 2025091118)
Vincent Griego, US Fish and Wildlife Service- Vincent_Griego@fws.gov

REFERENCES

California Department of Fish and Wildlife (CDFW, formerly California Department of Fish and Game). 2012. Staff Report on Burrowing Owl Mitigation. Available online at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline>

CDFW. 2024. Petition Evaluation for Western Burrowing Owl (*Athene cunicularia hypugaea*). Report to the Fish and Game Commission. California Department of Fish and Wildlife, P.O. Box 944209, Sacramento, CA.

Klute, D. S., L. W. Ayers, M. T. Green, W. H. Howe, S. L. Jones, J. A. Shaffer, S. R. Sheffield, and T. S. Zimmerman. 2003. Status Assessment and Conservation Plan for the Western Burrowing Owl in the United States. U.S. Department of Interior, Fish and Wildlife Service, Biological Technical Publication FWS/BTPR6001-2003, Washington, D.C.

O'Brien, S.M. and Helm, B.P. Minimum hydroperiod for metamorphosis in the California Tiger Salamander, *Ambystoma californiense*, *Herpetology Notes*, Volume 18: 613–616 (published online on 12 July 2025)

Shuford, W. D., and Gardali, T., editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento.

US Fish and Wildlife Service. 2016. Recovery Plan for the Santa Rosa Plain. Available online at: https://ecos.fws.gov/docs/recovery_plan/06012016_Final%20Santa%20Rosa_RP_signed_1.pdf

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ATTACHMENT 1

Draft Mitigation Monitoring and Reporting Program

Biological Resources (BIO)		
Mitigation Measure (MM) Description	Implementation Schedule	Responsible Party
<p>MM-BIO-1. Prior to project construction, the project shall: 1) prepare a figure based on current aerial imagery clearly outlining the project impact area and where it overlaps with or is adjacent to potential CTS upland or breeding habitat, 2) provide the figure to CDFW, and 3) obtain CDFW's written approval of the figure. If direct or indirect impacts to CTS habitat occur as a result of the project, prior to project construction, the project shall obtain a CESA ITP from CDFW and comply with the ITP. The project shall obtain authorization from the USFWS for impacts to CTS and comply with the authorization. The project shall also provide habitat compensation for CTS in accordance with the ITP and Santa Rosa Plain Conservation Strategy (Strategy). Please note that the CESA ITP habitat compensation requirements are often consistent the Strategy but may differ based on site specific conditions.</p>	<p>Prior to and during ground disturbance</p>	<p>Project Applicant</p>
<p>MM-BIO-2. If impacts adjacent to CTS habitat would occur as a result of the project, and impacts to CTS habitat would be avoided, the project shall prepare a CTS Avoidance Plan (plan) in consultation with CDFW, include CDFW's input in the plan, and implement it.</p>	<p>Prior to and during ground disturbance</p>	<p>Project Applicant</p>
<p>MM-BIO-3. Prior to ground disturbance, the project shall submit a wetland assessment and an evaluation of potential direct and indirect impacts to any on-site or adjacent off-site wetland habitat, such as modification of hydrological conditions or construction related sedimentation into occupied wetland habitat, to CDFW for review and obtain CDFW's written acceptance of the assessment and evaluation.</p> <p>If direct or indirect impacts to potentially suitable wetlands may occur, the project shall submit to CDFW two years of completed botanical survey results and obtain CDFW's written approval of the results prior to project construction. The botanical survey results should follow CDFW's 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants) and the Santa Rosa Plain Conservation Strategy, Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain (https://www.fws.gov/library/collections/santa-rosa-plain-conservation-strategy). If CDFW is unable to accept the survey results, the project shall conduct additional surveys prior to initiation of project activities or may assume presence of Sonoma sunshine, Burke's</p>	<p>Prior to and during ground disturbance</p>	<p>Project Applicant</p>

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<p>goldfields, and Sebastopol meadowfoam. Please be advised that for CDFW to accept the results, they should be completed in conformance with the above survey protocols and guidelines, including, but not limited to conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts such as altering off-site hydrological conditions where the above species may be present. Surveys should include the entire extent of any directly or indirectly impacted suitable wetland habitat, including portions of the wetland on adjacent parcels or not directly impacted, as impacts to part of a wetland often affects the entire wetland. Evaluation of indirect impacts may necessitate a thorough hydrological assessment that fully analyzes existing and post-project conditions to seasonal wetland habitat. Surveys conducted during drought conditions may not be acceptable. If the botanical surveys result in the detection of the above CESA listed plants that may be impacted by the project, or the presence of these species is assumed, the project shall obtain a CESA ITP from CDFW prior to construction and comply with all requirements of the ITP including, but not limited to providing habitat compensation. In addition, the project shall consult with the USFWS for any impacts to suitable habitat for plants listed under the federal ESA (e.g., wetlands) and provide compensatory habitat mitigation as required.</p>		
<p>MM-BIO-4. If the project occurs during the burrowing owl wintering season from September 1 to January 31, prior to project activities a Qualified Biologist shall conduct a burrowing owl habitat assessment within 1,640 feet of the project area pursuant to the California Department of Fish and Game (now CDFW) 2012 Staff Report on Burrowing Owl Mitigation (CDFW 2012 Staff Report, available here: https://wildlife.ca.gov/Conservation/Survey-Protocols#377281284-birds), unless otherwise approved in writing by CDFW. The Qualified Biologist shall have a minimum of two years of experience implementing the CDFW 2012 Staff Report habitat assessment and survey methodology. The habitat assessment shall focus on searching the California Natural Diversity Database and potentially other sources for any burrowing owl records on or within one mile of the project area, vegetation type and height, suitable burrows (with an opening of greater than 11 cm in diameter and a depth of greater than 150 cm), burrow surrogates (culverts, piles of concrete rubble, piles of soil, burrows created along soft banks of ditches and canals, pipes, and similar structures), and presence of burrowing owl sign (tracks, molted feathers, cast pellets, prey remains, egg shell fragments, owl white wash, and nest burrow decoration material), and the presence of burrowing owl individuals or pairs. If the habitat assessment does not identify suitable habitat and surveys are not conducted as described below, an additional habitat assessment shall be conducted within 14 days prior to construction and if new potentially suitable burrowing owl refugia are present surveys shall be conducted as described below, unless otherwise approved in writing by CDFW. The results of the habitat assessment shall be emailed to CDFW and the project shall</p>	<p>Prior to and during ground disturbance</p>	<p>Project Applicant</p>

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<p>obtain CDFW's written approval of the habitat assessment prior to starting project activities.</p> <p>If suitable burrowing owl habitat is observed, four surveys shall be conducted to detect the presence of burrowing owl pursuant to the CDFW 2012 Staff Report. Surveys should begin August 1. The site visits shall be spread evenly throughout the non-breeding season, unless otherwise approved in writing by CDFW. The survey results shall be emailed to CDFW and the project shall obtain CDFW's written approval of the survey results prior to starting project activities. In addition, a survey shall be completed within 14 days prior to the start of construction, as described in the CDFW 2012 Staff Report. Time lapses of more than 14 days between project activities may trigger subsequent surveys including, but not limited to a final survey conducted within 24 hours prior to ground disturbance.</p> <p>If burrowing owl is detected, the project shall immediately notify CDFW. The project shall avoid impacts to the burrowing owl and implement a 1,640-foot buffer area around the owl site in which no project activities shall occur, unless otherwise approved in writing by CDFW. A Qualified Biologist or Biological Monitor shall monitor any detected owl to ensure it is not disturbed.</p> <p>If the surveys result in the detection of the burrowing owl that may be impacted by the project, or the presence of this species and impacts to it are assumed, the project shall obtain a CESA ITP from CDFW prior to construction and comply with all requirements of the ITP including, but not limited to providing habitat compensation</p>		
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Response 1: CDFW

Response to CDFW Comment 1

The information in the MND regarding CTS is based on the project's Biological Resources Assessment (BRA) report. The BRA indicates that breeding and estivation habitat do not occur in the Project footprint but that it is possible that CTS may move through the drainage ditches adjacent to the Project footprint during migration from breeding to estivation areas outside the Project footprint. The proposed project does not include work directly or indirectly to the drainage ditches. The proper installation of silt fencing between the construction footprint and drainage ditches will prevent construction impacts to ditches and adjacent uplands.

While the USFWS critical habitat mapping indicates that the entirety of the Project location is designated critical habitat for CTS, it is not. The 2005 USFWS *Designation of Critical Habitat for the California Tiger Salamander, Central Population Final Rule* (50 CFR Part 17) states:

- *'We have determined that existing manmade features and structures, such as buildings, roads, railroads, airports, runways, other paved areas, lawns, and other urban landscaped areas are not likely to contain one or more of the PCEs.'* and
- *'Critical habitat does not include manmade structures (such as buildings, aqueducts, runways, roads, and other paved areas) and the land on which they are located existing within the legal boundaries on the effective date of this rule.'* and
- *'The scale of the maps prepared under the parameters for publication within the Code of Federal Regulations may not reflect the exclusion of such developed areas. Any such structures, and the land under them, that have been inadvertently left inside the critical habitat boundaries shown on the maps of this final rule, have been excluded by text in this rule, and are not designated as critical habitat. These developed and nonessential habitat areas do not contain the primary constituent elements and as such are not considered critical habitat.'*

Based on the USFWS description above nearly all the Project area is not designated CTS critical habitat.

As described in the MND the vast amount of the work will be conducted in areas that are currently paved and do not provide breeding or upland habitat for CTS. The MND addresses the three locations in the project footprint where project construction would occur in unpaved areas including two locations north of Todd Road and one to the south of Todd Road. The three non-paved areas include:

- An approximately 85 linear foot strip of repeatedly disturbed/ compacted gravel area that is also used by pedestrians,
- An area covered in concrete sidewalk, landscaping plants (dense English ivy), and boulders, and
- An area that consists of a dry compacted dirt/ gravel road shoulder.

These locations are all existing manmade features and or urban landscaped areas and do not provide breeding or upland habitat for CTS.

The proposed project would involve roadway excavation at the intersection to connect power to the new traffic signal mast arms and new drainage inlets to connect with the existing and/or relocated storm drain system. The Project does not include pavement widening activities and would not alter or work on or in the existing drainage ditches within the project site and the County believes would not have a significant impact CTS habitat.

Response to CDFW Comment 2

The first paragraph under Impact Analysis item 'a' on page 24 of the MND includes the following:

'Appendix B includes the complete listing of special status plants and wildlife and the determination of the potential for each to occur in the study area. The findings concerning the special-status plants

and wildlife in the project site are summarized below.'

MND Appendix B (Special Status Species Tables) was originally prepared for and included in the Projects BRA report. Appendix B was assembled using data from a CNDDDB RareFind, USFWS IPaC, CNPS online Inventory of Rare and Endangered Plants and other CDFW lists (special plants, special animals, etc.). During preparation of MND Biological Resources section recent database searches of CNDDDB RareFind, USFWS IPaC, and CNPS were run and the results incorporated in MND Appendix B. The 'Potential to Occur' column for special-status species in MND Appendix B was based on a field survey designed to assess habitat suitability and potential for occurrence.

The 'Special Status Species Tables' in MND Appendix B evaluated 65 special-status plant species and determined that the Project area provides marginal habitat for congested-headed hayfield tarplant (*Hemizonia congesta* ssp. *congesta*). The remaining 64 species were determined to not have suitable habitat present in the Project area. The Project MND, Appendix B provides a complete listing of the plant species evaluated and also provides a rationale regarding the species potential to occur in the Project area.

Several locations in the MND include statements like '*No construction activities would occur within the drainage ditches along Todd Road.*', '*The project does not alter the exiting drainage ditches within the project site.*', and '*The installation of silt fencing between the construction footprint and drainage ditches will prevent construction impacts to ditches and adjacent uplands.*' The Project description includes a construction BMP requiring the use of silt fence. The Project avoids impacts to the exiting drainage ditches in the project area.

The MND includes an evaluation of 65 special-status plant species and an analysis of the one species identified as having marginal habitat present. The MND concludes that '*Removal of congested-headed hayfield tarplant would be considered a significant impact. Implementation of mitigation measure BIO-1 will reduce potential impacts to less than significant.*' Mitigation measure BIO-1 requires a properly timed survey for special status plant including congested-headed hayfield tarplant to be conducted prior to initial construction activities. Mitigation measure BIO-1 also includes a range of actions to provide mitigation for special-status plant species if found in the Project area during preconstruction survey(s). Mitigation measure BIO-1 includes actions to be implemented to avoid impacts to special-status plant species if found in the Project area. Mitigation measure BIO-1 also includes actions to mitigate impacts to special-status plant species if the Project cannot avoid them by preparing a relocation/ propagation plan and relocating the special-status plant species to a location within the existing Project limits. The County believes that potential impacts to special status plants were properly evaluated and addressed in the MND.

Response to CDFW Comment 3

The first paragraph under Impact Analysis item 'a' on page 24 of the MND includes the following:

'Appendix B includes the complete listing of special status plants and wildlife and the determination of the potential for each to occur in the study area. The findings concerning the special-status plants and wildlife in the project site are summarized below.'

MND Appendix B includes an evaluation of burrowing owl and identifies that it is 'Not Expected' to occur and provides the following rationale '*Suitable nesting habitat and prey base are not present due to the small size and disturbed nature of ruderal areas in the project site.*' Because suitable habitat for burrowing owl was not identified during the preparation of Appendix B (Special Status Species Tables) and the subsequent field survey designed to assess habitat suitability and potential for occurrence burrowing owl was not evaluated further and mitigation not proposed