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CEQA INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

MOORLAND NEIGHBORHOOD PARK MASTER PLAN

SONOMA COUNTY, CALIFORNIA

Prepared for:

Sonoma County Regional Parks Department
2300 County Center Drive, Suite 120A
Santa Rosa, California 95403

Prepared by:

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Project No. RHA1501

LSA

March 2016

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MITIGATED NEGATIVE DECLARATION

Project Name. Moorland Neighborhood Park Master Plan

Project Location. The proposed park site is located at the corner of Moorland Avenue and West Robles Avenue, south of the Santa Rosa city limits in unincorporated Sonoma County, California (Figure 1). The project site includes two vacant parcels (Assessor Parcel Numbers (APN) 043-280-027 and 043-280-028) totaling 4.22 acres.

Project Description. Sonoma County Regional Parks proposes to develop a new neighborhood park in the underserved Moorland neighborhood in unincorporated Sonoma County. Proposed improvements include: a small turf field for informal play and potentially limited organized soccer play, a place for neighborhood events, a play area for kids, picnic areas, an off-leash dog area, a community garden, a memorial for Andy Lopez, a small parking area, perimeter sidewalks, interior paths, a skate plaza, basketball court, restroom, shade structure to serve as an outdoor clubhouse, and a natural area to accommodate storm water runoff and provide habitat and educational values.

Findings. It is hereby determined that, based on the information contained in the attached Initial Study, the project would not have a significant adverse effect on the environment.

Mitigation measures necessary to avoid the potentially significant effects on the environment are included in the attached Initial Study, which is hereby incorporated and fully made part of this Mitigated Negative Declaration. Sonoma County Regional Parks has hereby agreed to implement each of the identified mitigation measures, which would be adopted as part of the Mitigation Monitoring and Reporting Program.

Steve Ehret

Steve Ehret, Park Planning Manager
Sonoma County Regional Parks

1/27/16

Date

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INITIAL STUDY

PROJECT INFORMATION

Project title:

Moorland Neighborhood Park Master Plan

Lead agency name and address:

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

Contact person and phone number:

Mr. Scott Wilkinson
Park Planner II
Sonoma County Regional Parks
(707) 565-2734

Project location:

The proposed park site is located at the corner of Moorland Avenue and West Robles Avenue, south of the Santa Rosa city limits in unincorporated Sonoma County, California (Figure 1). The project site includes two vacant parcels (Assessor Parcel Numbers (APN) 043-280-027 and 043-280-028) totaling 4.22 acres (Figure 2).

Project sponsor's name and address:

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

General plan designation:

UR 5 (Urban Residential)

Zoning:

R1 B7 VOH (Low Density Residential District – Valley Oak Habitat Combining District)
R1 B7 RC 100/25 VOH (Low Density Residential District – Riparian Corridor Combining Zone – Valley Oak Habitat Combining District)

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FIGURE 1

0 1000 2000
FEET

SOURCE: ESRI StreetMap North America (2012).

I:\RHA1501\GIS\Maps\Figure 1_Regional Location.mxd (12/7/2015)

Moorland Neighborhood Park

Regional Location

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FIGURE 2

N

0 150 300
FEET

SOURCE: USDA NAIP (2014).

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Moorland Neighborhood Park

Project Site

Description of project

Sonoma County Regional Parks (SCRP) proposes to develop a new neighborhood park in the underserved Moorland neighborhood in unincorporated Sonoma County. The park would provide recreation and gathering space for the Moorland neighborhood, and a memorial for Andy Lopez. Development of the Master Plan included the formation of a steering committee and a series of community workshops, resulting in a proposed draft master plan. This Initial Study evaluates the potential environmental effects of implementing the proposed draft master plan.

Project Background. The need for a public park in the Moorland neighborhood was first identified more than twenty years ago. No parks are located within a half mile of the Moorland site, which is the typical neighborhood park service area. The closest park is Southwest Community Park, more than 2 miles away. During the 1990s, the developer of the Parkview subdivision to the north had proposed a second phase of construction that was to include a small neighborhood park. The streets and utilities were built, but the neighborhood park was never developed as proposed.

Community activism and support for the proposed park were recently reinvigorated following the tragic death of 13-year old Andy Lopez on the site in October 2013. The land was acquired through tax liens by Sonoma County and purchased by SCRP in early 2015 for use as a park and Parcel A in the project area is already being informally used by the public to memorialize Andy Lopez. This park is intended to serve as a gathering place for neighborhood residents and would formally memorialize Andy Lopez who grew up playing in and around the park site.

Planning Process. The planning for the park emerged from a collaborative community process. A steering committee of community members was convened and met four times over the course of the planning process. The steering committee was consistently involved in the leadership of the project throughout the entire process and helped plan and de-brief for each community workshop. A project kick-off meeting was followed by four community workshops held over a four month period. Between each workshop, the planning team assimilated the public input into multiple design iterations for the potential park. Through this process, the public participated in: site analysis, creating a park program, creating master plan alternatives, and finally selecting a preferred draft master plan for the proposed park. The draft master plan is a direct result of the community workshop process and reflects the expressed desires of the Moorland neighborhood community.

Project Site. The project site is a 4.22-acre undeveloped property comprised of two separate parcels located in the Moorland neighborhood immediately south of the Santa Rosa city limits in unincorporated Sonoma County. The first parcel consists of a 1.04-acre undeveloped property at 3399 Moorland Avenue (APN 043-280-027) (Parcel A). The second parcel is a 3.18-acre undeveloped property across the street at the corner of Horizon Way and West Robles Avenue (APN 043-280-028) (Parcel B). This parcel is bound to the west by the planned Sonoma Marin Area Rapid Transit (SMART) line and multi-use trail.

Project Elements. The preliminary program for the park includes a number of elements connected by a pathway system (Figure 3). These elements include:

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N

0 30 60
FEET

SOURCE: RHAA 2015

FIGURE 3

Moorland Neighborhood Park

Proposed Project

P:\RHA1501 Moorland Park\g\Figure 3_Proposed Project.cdr (1/26/2016)

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- **Turf Field.** A turf field (approximately 1.25 acres) would be created in the northeast corner of the second parcel, at the corner of Horizon Way. The field would be used for informal and potentially limited organized soccer play for kids ten and younger.
- **Place for Neighborhood Events.** A kiosco with a plaza in the smaller eastern parcel (Parcel A) would provide a place for community gathering and events. The proposed turf field on the larger western parcel (Parcel B) could also be used for larger neighborhood events.
- **Playground.** A play area (approximately 3,000 square feet) for kids is proposed in the northern portion of Parcel A. The proposed playground would include an area for school-aged children between 5-12 years of age, and a Tot area for smaller children. A restroom would be installed in the northwest corner near the play area and centrally located to serve the overall park.
- **Picnic Areas.** There would be a large picnic area with twelve picnic tables next to the kiosco plaza. The space would be surrounded by trees for shade, and would accommodate a group picnic or a few small picnic parties.
- **Picnic Area/Teen Zone.** A full court basketball and a skate plaza are proposed in the teen zone. Next to these facilities, an area with a shade structure, seat walls, and round tables (outdoor clubhouse) would be developed that could be used by the youth to picnic, play games, and hang out.
- **Off-Leash Dog Area.** An off-leash dog area (approximately 9,000 square feet) would be established adjacent to the SMART tracks/path on the western edge of the proposed park site. The dog park would be surrounded by a 4-foot fence, have trees for shade, and open space for the dogs to run. The dog park would include a durable surface (e.g., decomposed granite or wood chips), benches, bag station, water station, and a trash receptacle.
- **Community Garden.** Approximately 5,000 square feet in the northernmost portion of the proposed park would be set aside for development of a community garden. The garden area would be surrounded by a 6-foot garden fence and would include decomposed granite (dg) interior paths, compost bins, approximately 25-30 garden plots, and likely a small garden shed.
- **Memorial Garden/Art Garden.** A Memorial Garden would be designed and developed in the eastern quadrant of Parcel A. The Memorial Garden may include: A memorial oak tree, a rose garden, a memorial plaque for Andy Lopez, and dg paths around the garden beds with seating. Other elements could include a sculpture, fountain, or other artwork to be incorporated into a unified design for the area.
- **Small Parking Area.** A small parking area would be established along both sides of Horizon Way accommodating 24 parking spaces (including two accessible parking spaces), resulting in a net increase of approximately eleven parking spaces. This parking area would provide parking for those visiting the park, and retain neighborhood parking. New parallel parking (approximately ten spaces) would also be created on W. Robles Avenue where the roadway would be widened and a new sidewalk installed

- **Gateway Arch.** A simple entry gateway arch would be located on the path entering from the intersection of Moorland Avenue and West Robles marking the symbolic and visual entry to the park. An alternate location for a park sign is on the large parcel corner at Horizon Way.
- **Natural Area.** Approximately 35,000 square feet (0.8 acre) of land would be designed and developed along West Robles Avenue in the southwest corner of the proposed park site as a natural area to provide habitat and educational values, as well as to accommodate storm water runoff. A network of pathways is proposed to provide access through this area and connections to other areas of the park.

Construction. Construction is anticipated to take approximately 7 months (June – November 2016) and would require use of typical construction equipment for grading the site and installing park facilities.

Operation and Maintenance. The park would be open from sunrise to sunset, but could be used in the evenings for special planned neighborhood events. Events held at the park would require a permit consistent with existing Sonoma County Regional Parks' regulations. A minimum amount of security lighting would be installed for safety. Security lighting would consist of pole-mounted light fixtures along the main interior pathways, near the play areas and teen zone, and in the new parking area. The turf field, sports court and skate plaza would not be lit for nighttime use. Light levels would be sufficient for safety/security, but are not intended to promote use of the park after the park is closed.

Trees, shrubs, and groundcovers would be used throughout the park. The exact species have not yet been determined, but most would be either native species or drought tolerant species. In some areas, the ground plane may be bark mulch rather than ground covers. The turf grass areas would require typical maintenance such as fertilizer and irrigation. An automatic irrigation system would be designed to minimize water use and be adapted to weather conditions.

Surrounding land uses and setting:

The project site consists of approximately 4 acres of vacant land in the community of Roseland in unincorporated Sonoma County. It is bordered by residential development to the north and east, commercial/light industrial development to the west, and commercial/light industrial, residential, and undeveloped land to the south. The Northwestern Pacific Railroad tracks/planned SMART line and multi-use trail form the western boundary of the project site.

Topography on the site is flat, with elevations ranging from 108 to 112 feet above mean sea level. Soils underlying the site are mapped as Wright loam, shallow, wet (0 to 2 percent slopes). This nearly level soil has somewhat poor drainage; permeability and runoff is very slow (USDA 1977). However, native soils at the project site have been substantially altered by prior agricultural activities and adjacent development (WRA Inc. 2015a).

The majority of the site is dominated by disturbed, non-native grassland and is interspersed with small stands of apple trees, which appear to be remnants from a former orchard. More

recent activities at the site include routine mowing and use by unauthorized all-terrain vehicles. Currently, much of the surrounding land has been converted to suburban housing developments.

While the project site is dominated by non-native grassland, it also contains a likely jurisdictional seasonal wetland. Non-native grassland consists of a dense to spare cover of annual grasses, often associated with numerous species of showy-flowered, native annual forbs. According to the Biological Resources Assessment (WRA Environmental Consultants 2015) prepared for the park project, the project site appears to be dominated by a mix of non-native grasses, predominantly Harding grass (*Phalaris aquatica*), with Italian rye grass (*Festuca perennis*), foxtail barley (*Hordeum murinum*), and wild oat (*Avena barbata*) also present in lower densities. Common forbs include wild radish (*Raphanus sativus*), prickly lettuce (*Lactuca serriola*), cheeseweed (*Malva parviflora*), field vetch (*Vicia sativa*), and filarees (*Erodium* spp.).

One potential jurisdictional seasonal wetland, comprising 0.45 acres, was identified within the western portion of the project site. Standing water up to 4 inches in depth was observed in portions of the wetland and soils were saturated to the surface throughout the wetland; a water table was present at a depth of approximately 11 inches. Vegetation was dominated by hydrophytic grasses and sedges including semaphore grass (*Pleuropogon californicus*), Italian rye grass, and an unidentified sedge (*Carex* sp.). The forbs present were also indicative of wetland hydrology and included Hyssop loosestrife (*Lythrum hyssopifolia)* and fiddle dock (*Rumex pulcher*). Apple trees were observed on the fringe of the wetland with very few occurring within the wetland boundary.

Other public agencies with approval authority:

- U.S. Army Corps of Engineers (Section 404 of the Clean Water Act)
- California Department of Fish and Wildlife (Streambed Alteration Agreement)
- Regional Water Quality Control Board (Water Quality Certification or Waste Discharge Requirements)
- State Water Resources Control Board (National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity)

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

	Aesthetics		Land Use/Planning
	Agricultural & Forest Resources		Mineral Resources
X	Air Quality		Noise
X	Biological Resources		Population/Housing
X	Cultural Resources		Public Services
X	Geology/Soils	**X**	Recreation
	Greenhouse Gas Emissions		Transportation/Traffic
X	Hazards & Hazardous Materials		Utilities/Service Systems
	Hydrology/Water Quality	**X**	Mandatory Findings of Significance

Determination. (To be completed by the Lead Agency.)

On the basis of this initial evaluation:

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

X 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.

Steve Ehret

Steve Ehret, Park Planning Manager
Sonoma County Regional Parks

1/27/16
Date

EVALUATION OF ENVIRONMENTAL IMPACTS

This section identifies the environmental impacts of this project by answering questions from Appendix G of the CEQA Guidelines, the Environmental Checklist Form. The environmental issues evaluated in this chapter include:

Aesthetics	Land Use and Planning
Agricultural & Forest Resources	Mineral Resources
Air Quality	Noise
Biological Resources	Population and Housing
Cultural Resources	Public Services
Geology/Soils	Recreation
Greenhouse Gas Emissions	Transportation/Traffic
Hazards and Hazardous Materials	Utilities and Service Systems
Hydrology and Water Quality	Mandatory Findings of Significance

All analyses take into account the entire action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts. Impacts are categorized as follows:

Potentially Significant Impact is appropriate if there is substantial evidence that an effect is significant, or where the established threshold has been exceeded. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) may be required.

Less Than Significant with Mitigation Incorporated applies where the incorporation of mitigation measures would reduce an effect from Potentially Significant Impact to a Less Than Significant Impact. Mitigation measures are prescribed to reduce the effect to a less than significant level.

Less Than Significant applies when the project will affect or is affected by the environment, but based on sources cited in the report, the impact will not have an adverse effect. For the purpose of this report, beneficial impacts are also identified as less than significant. The benefit is identified in the discussion of impacts, which follows each checklist category.

A No Impact answer is adequately supported if referenced information sources show that the impact simply does not apply to projects like the one involved. A No Impact Answer is explained where it is based on project-specific factors as well as general standards.

I. AESTHETICS

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				X
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Affected Environment

The project site is located in unincorporated Sonoma County within the Urban Growth Boundary of the City of Santa Rosa in a predominantly residential neighborhood. The project site consists of two parcels and is bounded to the west by the planned SMART line and multi-use trail, to the north and east by residential development, to the east by Moorland Avenue and to the south by West Robles Avenue. Commercial/light industrial development is located to the south and west. Both parcels are currently undeveloped and are used as informal open space by local residents.

Topography on the site is flat, with elevations ranging from 108 to 112 feet above mean sea level (MSL). The majority of the site is dominated by disturbed, non-native grassland and is interspersed with small stands of apple trees, which appear to be remnants from a former orchard. Review of recent historical images suggests that the site has been routinely mowed and has been used by unauthorized all-terrain vehicles (WRA 2015).

According to the Phase I Environmental Site Assessment (Environmental Geology Services, Inc. 2015), the property was vacant with the exception of the following:

- A number of informal foot paths or trails, an informal tent-like memorial structure, a number of play structures, miscellaneous pieces of furniture and three car tires were located on Parcel A.
- A number of scattered apple trees and small oak trees, some wood debris, an apparent small homeless camp site were located on the Parcel B. In addition, the northeast portion of the parcel appeared to have had a few feet of fill placed on it (based on the observed variances in topography and vegetation).

The nearest primary surface water body to the site is a channelized tributary to the Laguna de Santa Rosa, approximately 1 mile to the west.

Discussion

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

Less Than Significant Impact. According to Figure OSRC-1, Scenic Resource Areas in the Sonoma County General Plan 2020 (2008), the project site is not located within an area designated as a Scenic Landscape Unit, Scenic Corridor or Community Separator. U.S 101 located east of the site is designated as a Scenic Corridor. The project site is relatively flat and the surrounding area is developed with residential and commercial/light industrial land uses allowing for limited views of the surrounding landscape.

Visible elements of the proposed project would include the kiosco, play structures, basketball court, skate plaza, shade structure, fencing for the dog park and community garden, and memorial garden. Proposed improvements would not include any structures taller than 30 feet (maximum one-story) or landscaping that would reduce, obstruct, or degrade scenic vistas. Therefore, the proposed project is not anticipated to have a significant effect on scenic vistas.

Construction activities would be visible from adjacent uses and public roadways. However, the equipment required for construction would only be visible temporarily. As described above, upon completion, project elements would be at grade or low-standing (less than 30 feet tall). Therefore, impacts to scenic vistas would be less than significant.

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 the vicinity of a State Scenic Highway (Caltrans 2015) nor is it located near any rock outcroppings or historic buildings. As described further in Section IV.e., development of the proposed park could require the removal of existing trees, including trees potentially considered as “protected” trees under the County’s Tree Protection Ordinance. The County would be required to comply with all provisions of the Tree Protection Ordinance, including replacing trees proposed for removal. As part of the proposed project, the County would plant trees and install additional landscaping. Therefore, no impacts to scenic resources within a State Scenic Highway would occur with implementation of the proposed project.

c) *Substantially degrade the existing visual character or quality of the site and its surroundings?*

Less Than Significant Impact. Goals and policies in the Sonoma County General Plan 2020 (2008) promote the preservation of the County’s rural and natural character and the regulation of development in rural areas. The project site is located in an area developed with suburban residential and commercial land uses. Implementation of the proposed project would provide a needed neighborhood park to this residential area.

The proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings. Implementation of the proposed project would construct new facilities (e.g., kiosco, playground, basketball court, skate plaza, shade structure, fencing, and memorial garden). These features would be at-grade or low-standing. The proposed project would be consistent with the goals and policies in the Sonoma County General Plan 2020 (2008).

Development of the proposed park would require the removal of some existing trees and vegetation, including some small (6-inches in diameter) coast live oak trees (*Quercus agrifolia*). The County's Tree Protection Ordinance (Section 26-88-010(m)) requires that projects be designed to minimize the destruction of protected trees greater than nine (9) inches in diameter. According to Section 26-202-140 of the Sonoma County Code, "protected tree" means big leaf maple (*Acer macrophyllum*), black oak (*Quercus kelloggii*), blue oak (*Quercus douglasii*), coast live oak, interior live oak (*Quercus wislizenii*), madrone (*Arbutus menziesii*), oracle oak (*Quercus morehus)*, Oregon oak (*Quercus garryana)*, redwood (*Sequoia sempervirens)*, valley oak (*Quercus lobate)*, California bay (*Umbellularia california)* and their hybrids. It is not anticipated that any "protected" trees would be removed as a result of implementation of the Master Plan. However, if any "protected" trees are identified for removal, the County would be required to comply with all provisions of the Tree Protection Ordinance, including replacement of any protected trees proposed for removal. As outlined in the project description, the County would plant trees and install additional landscaping as part of the proposed project.

Construction activities associated with the installation of these facilities would be visible from adjacent uses and public roadways. However, construction equipment would only be visible temporarily.

For the reasons described above, impacts to the existing visual character or quality of the site would be less than significant.

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 project site is located in a developed area. Streetlights, vehicle head and tail lights on area roadways, and lighting associated with adjacent development are the existing sources of light and glare in the project area. The proposed project would involve construction of a neighborhood park that would not be open at night. Similar to other County parks, the proposed project would be closed to the public from dusk until dawn, with the exception of occasional special neighborhood events. As part of the proposed project, a minimum amount of security/safety lighting would be installed near developed areas of the park. Lighting would consist of pole-mounted light fixtures along the main interior pathways, near the play area and the proposed parking area. Light levels would be sufficient to provide security/safety, but are not intended to promote use of the park after the park is closed.

The Sonoma County General Plan 2020 (2008) requires that all lighting be cast downward and be at no more than both the minimum height required and the power

necessary for the proposed use. Consistent with the policies outlined in the Sonoma County General Plan, each light fixture would be directed downward and away from adjoining properties and public right of way, so that no on-site light fixture would directly illuminate any off-site areas. With adherence with these requirements, the proposed project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. This impact would be less than significant.

II. AGRICULTURAL AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project	**Potentially Significant Impact**	**Potentially Significant Unless Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to a non-agricultural use??				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?				X

Affected Environment

The project site is mapped as "Urban and Built-Up Land" by the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) (California Department of Conservation, Division of Land Resource Protection 2014). Urban and Built-Up Land is occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10 acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment and water control structures.

The project site is zoned for Low Density Residential (R1) with Valley Oak Habitat Combining District (Sonoma County 2013). Parcel B is also located in a Riparian Corridor Combining Zone. The purpose of the R1 zoning designation is intended for single-family homes in low density residential areas, which are compatible with the existing neighborhood character. The Valley Oak Habitat Combining District is intended to protect and enhance valley oaks and valley oak woodlands and to implement the provisions of the General Plan Resource Conservation Element. The Riparian Corridor Combining Zone is established to protect biotic resource communities, including critical habitat areas within and along riparian corridors for their habitat and environmental value, although there is no riparian habitat present at the project site.

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. The project site is not under a Williamson Act contract (Sonoma County 2013).

No forest land or timberland is identified on or near the project site, and the project site is not zoned for forest or timber uses.

Discussion

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

   No Impact. No Farmland is mapped on or near the project site. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance to a non-agricultural use.

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

   No Impact. The project site is not zoned for agricultural use and is not under a Williamson Act contract. Therefore, implementation of the proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.

c) *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code*

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

No Impact. The project area contains no forest or timberland and is not zoned for forest land, timberland, or timberland production.

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

No Impact. See response II(c) above.

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. See responses II (a) and II(c) above.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	**Potentially Significant Impact**	**Potentially Significant Unless Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?		X		
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?		X		
d) Expose sensitive receptors to substantial pollutant concentrations?		X		
e) Expose sensitive receptors to substantial pollutant concentrations?			X	

Affected Environment

The proposed project is located in Sonoma County within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD), which regulates air quality in the San Francisco Bay Area. Air quality conditions in the San Francisco Bay Area have improved significantly since the BAAQMD was created in 1955. Ambient concentrations of air pollutants and the number of days during which the region exceeds air quality standards have fallen substantially. In Sonoma and the rest of the air basin, exceedances of air quality standards occur primarily during meteorological conditions conducive to high pollution levels, such as cold, windless winter nights or hot, sunny summer afternoons.

The BAAQMD Air Monitoring Program operates a 28-station monitoring network which provides the data required to determine whether the Bay Area is in compliance with State and federal air quality standards. Pollutant monitoring results for the years 2012 to 2014 at the Sonoma County ambient air quality monitoring station is described below. When data is not available at this station, data from the Santa Rosa 5th Street station and the Healdsburg 133 Matheson Street station is provided.

Ozone levels, as measured by peak concentrations and the number of days over the State 1-hour standard, have declined substantially as a result of aggressive programs by the BAAQMD and other regional, State and federal agencies. The reduction of peak concentrations represents progress in improving public health; however the Bay Area still exceeds the State standard for 1-hour and 8-hour ozone levels. In addition, the Bay Area was designated as a nonattainment area for the federal 8-hour ozone level. Exceedances of

the State's 1-hour standard have not been recorded at the Sonoma air monitoring stations from 2012 to 2014. In addition, there have been no exceedances of the State standard over the 3-year period and no exceedances of the federal 8-hour standard during the 3-year period (California Air Resources Board 2015).

National and State standards have also been established for fine particulate matter (diameter 2.5 microns or less, $PM_{2.5}$), over 24-hour and yearly averaging periods. Fine particulate matter, because of the small size of individual particles, can be especially harmful to human health. Fine particulate matter is emitted by common combustion sources such as cars, trucks, buses and power plants, in addition to ground-disturbing activities. $PM_{2.5}$ levels did not exceed the federal 24-hour standards at any time between 2012 and 2014.

The Bay Area is an unclassified area for the federal PM_{10} standard and a nonattainment area at the State level. An "unclassified" designation signifies that data does not support either an attainment or nonattainment status. No exceedances were recorded at the Healdsburg – 133 Matheson Street station for State PM_{10} levels during the 3-year period. Carbon monoxide (CO) levels were monitored during 2012 at the Santa Rosa – 5th Street station; no exceedances of the State or federal standards have been recorded. The Bay Area is currently considered an attainment area for State and federal CO standards (California Air Resources Board 2015).

Discussion

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

Less Than Significant Impact. The air quality plan applicable to the project area is the BAAQMD Bay Area 2010 Clean Air Plan (Clean Air Plan), which was adopted on September 15, 2010 (BAAQMD 2010). The Clean Air Plan is a comprehensive plan to improve Bay Area air quality and protect public health. The Clean Air Plan defines control strategies to reduce emissions and ambient concentrations of air pollutants; safeguard public health by reducing exposure to air pollutants that pose the greatest heath risk, with an emphasis on protecting the communities most heavily affected by air pollution; and reduce greenhouse gas emissions to protect the climate. Consistency with the Clean Air Plan can be determined if the project: 1) supports the goals of the Clean Air Plan; 2) includes applicable control measures from the Clean Air Plan; and 3) would not disrupt or hinder implementation of any control measures from the Clean Air Plan. An evaluation of the project's consistency with each of these criteria is provided below. As described below, the proposed project would not conflict with or obstruct implementation of the Clean Air Plan and this impact would be less than significant.

The proposed project would construct a park spanning two empty lots. As included above, there were no air quality violations during 2012 to 2014 in the project site vicinity. Additionally, the project would not conflict with the strategies outlined in the Clean Air Plan for bringing the area into compliance, therefore; this impact is considered less than significant.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Unless Mitigation Incorporated. Air pollutant emissions associated with the proposed project would occur over the short-term in association with construction activities, such as vehicle and equipment use. The project would not generate long-term regional emissions as described below.

Short-Term (Construction) Emissions. Construction activities could generate exhaust emissions from utility engines, on-site heavy duty construction vehicles, equipment hauling materials to and from the site, and motor vehicles transporting construction crews. Exhaust emissions during construction would vary daily as construction activity levels change. The use of construction equipment would result in localized exhaust emissions.

The project would require the operation of approximately 2-3 pieces of equipment at any given time during the construction period, for six months from June to November 2016. The BAAQMD construction criteria pollutant screening size (the size for which additional emission analysis would be required to determine if a project would exceed the daily emission threshold) is 67 acres for a city park. The proposed project is approximately 4.2 acres, which is well below the screening size for any land use type. Therefore, the project would not approach or exceed the BAAQMD's screening criteria and would not have a significant impact related to construction emissions.

Fugitive dust emissions are associated with excavation, land clearing, exposure, and cut-and-fill operations. Dust generated daily during construction would vary substantially, depending on the level of activity, the specific operations, and weather conditions. On a limited basis, sensitive receptors in the vicinity and on-site workers may be exposed to blowing dust, depending on the prevailing wind. BAAQMD specifies mitigation measures for dust control during construction projects. These mitigation measures are intended to reduce fugitive PM_{10} emissions to less than significant levels during the construction period. Implementation of Mitigation Measure AIR-1 would reduce this short-term construction period air quality impact to a less-than-significant level.

> **Mitigation Measure AIR-1:** Consistent with guidance from the BAAQMD, the following controls shall be implemented at the construction site to control construction emissions:
>
> - All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered to control dust and other particulate pollutants as needed to control construction emissions.
> - 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 shall be prohibited.

- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- 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 5 minutes (as required by the California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points regarding maximum idling time.
- 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.
- The contractor shall post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Sonoma County Permit and Resources phone number shall also be visible to ensure compliance with applicable regulations.

Long-Term (Operational) Emissions. Long-term air emissions impacts are associated with any change in permanent use of the project site by on-site stationary and off-site mobile sources that substantially increase vehicle trip emissions. No stationary sources of emissions are proposed as part of the project. Once completed, the proposed project would generate vehicle trips including maintenance workers and park visitors. The proposed park is located within a residential area and would be accessible by walking and bicycling. The BAAQMD operational criteria pollutant screening size for a city park is 2,613 acres. The proposed project would be 4.22 acres which is well below the screening size; therefore, long-term operation of the proposed project would not contribute substantially to an existing or projected air quality violation.

c) *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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

Potentially Significant Unless Mitigation Incorporated. Implementation of Mitigation Measure AIR-1 would reduce construction-related emissions. As discussed in Sections III.b. and III.c. the proposed park is well below the screening size provided by the BAAQMD for operational and construction-related emissions. Therefore, construction and operation of the project would not significantly contribute cumulatively to pollution levels in the air basin. With implementation of Mitigation Measure AIR-1, this impact is less than significant.

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

Potentially Significant Unless Mitigation Incorporated. Construction of the proposed project may expose surrounding land uses to airborne particulates and fugitive dust, as well as a small quantity of pollutants associated with the use of construction equipment

(e.g., diesel-fueled vehicles and equipment). Implementation of Mitigation Measure AIR-1, described above, would reduce construction-related emissions to a less than significant level. As discussed in Section III.b, the proposed project would not result in any long-term air quality impacts. Therefore, nearby sensitive receptors would not be exposed to substantial pollutant concentrations.

e) Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. The *BAAQMD CEQA Guidelines* lists potential odor sources that could cause significant environmental impacts. The types of operations that would occur on the project site are not included in this list and would not generate objectionable odors. Some objectionable odors could be generated from the operation of diesel-powered construction equipment during the project construction period. However, these odors would be short-term in nature and would not result in permanent impacts to surrounding land uses, including sensitive receptors in the vicinity of the project site. Once constructed the proposed project would not create objectionable odors affecting a substantial number of people or subject persons to objectionable odors.

IV. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		X		
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?		X		
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?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		X		
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?		X		

WRA Environmental Consultants prepared a Biological Resources Assessment (BRA) for the project site (WRA 2015) that included background research, review of aerial photographs, field survey, and wetland delineation. The biological resources onsite are described below and are summarized from that report.

Affected Environment

The project site consists of approximately 4.2 acres of vacant land in unincorporated Sonoma County. The majority of the site is dominated by disturbed, non-native grassland and is interspersed with small stands of apple trees, which appear to be remnants from a former orchard. The site also contains a jurisdictional seasonal wetland. Descriptions of these biological communities are provided below. Figure 4 shows the biological communities present on the site.

Non-native Grassland. Non-native grassland is described as a dense to sparse cover of annual grasses, often associated with numerous species of showy-flowered, native annual forbs. According to the BRA (WRA 2015), the project site appears to be dominated by a mix of non-native grasses, predominantly Harding grass (*Phalaris aquatica*), with Italian rye grass (*Festuca perennis*), foxtail barley (*Hordeum murinum*), and wild oat (*Avena barbata*) also present in lower densities.

Common forbs included wild radish (*Raphanus sativus*), prickly lettuce (*Lactuca serriola*), cheeseweed (*Malva parviflora*), field vetch (*Vicia sativa*), and filarees (*Erodium* spp.). The nonnative grassland in Parcel B is interspersed with apple trees (*Malus pumila*) that are remnants of a former orchard.

Seasonal Wetland. One jurisdictional seasonal wetland, comprising 0.45 acres, was identified within the western portion of the project site (WRA 2015). Standing water up to 4 inches in depth was observed in portions of the wetland and soils were saturated to the surface throughout the wetland; the water table was present at a depth of approximately 11 inches. Vegetation was dominated by hydrophytic grasses and sedges including semaphore grass (*Pleuropogon californicus*), Italian rye grass, and an unidentified sedge (*Carex* sp.). The forbs present were also indicative of wetland hydrology and included Hyssop loosestrife (*Lythrum hyssopifolia)* and fiddle dock (*Rumex pulcher*). Apple trees were observed on the fringe of the wetland with very few occurring within the wetland boundary.

No distinct vegetative or topographic break separated the seasonal wetland from the surrounding upland habitat; therefore, the boundary was delineated primarily based on the presence/absence of soil saturation at various sampling points. The mapped wetland boundary loosely corresponds to the boundaries from a previous wetland delineation that was completed in 1995 (Corps File Number 21319N96); however, changes to the supporting hydrology due to adjacent development have contributed to an overall loss of wetland habitat acreage, particularly on Parcel A which no longer supports any wetland habitat and is dominated by Harding grass. The remaining wetland habitat has apparently become wetter, with an increased depth and duration of ponding compared to the conditions observed in the previous delineations.

Special-status Plant Species. According to the BRA (WRA 2015), approximately 58 special status plant species have been documented in the vicinity of the project site. Of these 58 special-status species, 11 were determined to have a moderate potential for occurrence on the project site. The species with a moderate potential for occurrence generally require seasonal wetland or vernal pool habitat. The remaining 47 special-status

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SOURCE: WRA 2015

FIGURE 4

Moorland Neighborhood Park

Biological Communities within the Project Area

P:\RHA1501 Moorland Park\g\Figure 4_Biological Communities within the Project Area.cdr (12/7/2015)

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plants were determined to have no potential or to be unlikely to occur on the project site due to lack of suitable habitat.

No special-status species were observed during the single site visit conducted for the BRA. For the three special-status plant species covered under the Conservation Strategy, one year of protocol-level rare plant surveys have been conducted to date, with no special-status plant species observed. However, given the USFWS requirement of two years of rare plant surveys to substantiate a negative finding, a second year of surveys is planned for spring 2016. Special-status plant species with a moderate potential for occurrence that are listed as state- or federally endangered are discussed in greater detail below.

- **Sonoma sunshine (*Blennosperma bakeri*) - Federal Endangered, State Endangered, California Rare Plant Rank (CRPR) 1B.** Sonoma sunshine is an annual herb in the sunflower family (Asteraceae) that blooms from March to May. It typically occurs on heavy clay soils in vernally wet areas in vernal pool, and valley and foothill grassland habitat (CDFW 2015, CNPS 2015). This species is an obligate wetland plant (Lichvar 2012), and is restricted to vernal pool habitat (Keeler-Wolf et al. 1998). Sonoma sunshine has a moderate potential to occur in the project site due to the presence of a seasonal wetland and grassland habitat as well as the presence of associated species. The nearest known occurrence is approximately 1.5 miles south of the project site.
- **Burke's goldfields (*Lasthenia burkei*) - Federal Endangered, State Endangered, CRPR 1B.** Burke's goldfields are annual herbs in the sunflower family (Asteraceae) that bloom from April to June. It typically occurs in mesic portions of pools and swales in meadow, seep, and vernal pool habitat at elevations ranging from 45 to 1970 feet (CDFW 2015, CNPS 2015). This species is an obligate wetland plant (Lichvar 2012), and is restricted to vernal pool habitat (Keeler-Wolf et al. 1998). Burke's goldfields have a moderate potential to occur on the project site due to the presence of suitable seasonal wetland habitat and associated species. The nearest documented occurrence is approximately 1.2 miles east of the project site.
- **Sebastopol meadowfoam (*Limnanthes vinculans*) - Federal Endangered, State Endangered, CRPR 1B.** Sebastopol meadowfoam is an annual herb in the meadowfoam family (Limnanthaceae) that blooms from April to May. It typically occurs on poorly drained clay or sandy soils in swales, depressions, and pools of marshy areas of valley oak savanna, mesic meadow, vernal pool, and valley and foothill grassland habitat at elevations ranging from 45 to 1000 feet (CDFW 2015, CNPS 2015). This species is an obligate wetland plant (Lichvar 2012), and is restricted to vernal pool habitat (Keeler-Wolf et al.1998). Sebastopol meadowfoam has a moderate potential to occur on the project site due to the presence of suitable seasonal wetland habitat, and the presence of associated species. The nearest documented occurrence is approximately 1.2 miles south of the project site.

Special-status Animal Species. According to the BRA (WRA 2015), approximately 18 special-status animal species have been documented in the vicinity of the project site. Of these 18 special-status species, 16 species are unlikely or have no potential to occur within the project site due the lack of suitable habitat and/or the highly disturbed nature of the site.

Two species were found to have a moderate potential to occur within the project site. These three species are discussed in detail below.

- **White-tailed kite (*Elanus leucurus*) - CDFW Fully Protected Species.** The white-tailed kite is resident in open to semi-open habitats throughout the lower elevations of California, including grasslands, savannahs, woodlands, agricultural areas and wetlands. Although the project site is highly disturbed, the large contiguous area of open space located to the west provides suitable foraging and nesting habitat for the white-tailed kite. Kites may nest in close proximity to development, and thus there is some potential for nesting on or adjacent to the project site.
- **California Tiger Salamander (*Ambystoma californiense*) Sonoma Distinct Population Segment (DPS) - Federal Endangered, State Threatened.** The California tiger salamander is restricted to grasslands and low-elevation foothill regions in California (generally under 1,500 feet) where it uses seasonal aquatic habitats for breeding. California tiger salamanders also breed in natural ephemeral pools, or ponds that mimic ephemeral pools (stock ponds that go dry), and occupy substantial areas surrounding the breeding pool as adults. California tiger salamanders spend most of their time in the grasslands surrounding breeding pools.

  The project site is located within the known range of the Sonoma DPS for California tiger salamander and numerous records exist for California tiger salamander in the vicinity of the project site. The nearest adult record is located approximately 1,500 feet (0.3 mile) west of the project site. Adult California tiger salamanders are known to travel up to 1.3 miles from breeding sites (Sweet 1998) and upland areas within 1.3 miles of known breeding sites are considered to be California tiger salamander habitat unless there are significant barriers to movement (USFWS et al. 2005) or the habitat is unsuitable.

  The Moorland Park project site is located within 1.3 miles of known breeding sites, but consists of a small (approximately 4-acre) vacant parcel in an otherwise densely developed area. The project site is bordered by high-density residential development to the north, residential development and U.S. Highway 101 to the east, residential and commercial/light industrial development to the south, and commercial/light industrial development to the west. Highway 101 to the east represents a clear barrier to California tiger salamander movement to and from areas east of the site. In addition, there is over 1,000 feet of impervious surface separating the project site from the higher quality open space lands to the west. In spite of its somewhat isolated location from other California tiger salamander habitat, the project site itself likely contains suitable breeding habitat in the form of a seasonal wetland that ponds for a minimum of 10 continuous weeks most years. Sierran treefrog tadpoles (*Pseudacris sierra*) were observed in the wetland at the time of the site visit, but no California tiger salamander eggs or larvae were observed.

Jurisdictional Waters. The seasonal wetland on the project site is considered a jurisdictional wetland according to the criteria established by the U.S. Army Corps of Engineers (Corps). This area has been formally delineated, but this delineation has not been confirmed by the Corps.

Discussion

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

Potentially Significant Unless Mitigation Incorporated. While no special-status species have been observed on the project site, suitable habitat is present within the 0.45-acre seasonal wetland for special-status species associated with the Santa Rosa Plain Conservation Strategy Area, including California tiger salamander, and three special-status plant species: Burke's goldfields, Sonoma sunshine, and Sebastopol meadowfoam.

The Santa Rosa Plain Conservation Strategy Area is an area established by the United States Fish and Wildlife Service (USFWS) for the protection and continued existence of California tiger salamander, Burke's goldfields, Sonoma sunshine, and Sebastopol meadowfoam. The Final Conservation Strategy (USFWS et al. 2005) outlines the species of concern for this area along with guidance for specific conservation measures. In 2007 the Corps consulted with USFWS for Section 404 permitting within the Conservation Strategy Area (the Santa Rosa Plain), which resulted in the issuance of a Programmatic Biological Opinion (PBO; USFWS 2007). The PBO for the Santa Rosa Plain outlines the mitigation requirements necessary to compensate for impacts to wetlands and associated species including California tiger salamander and the three listed plants. Projects that are permitted under the Nationwide permit program can be appended to the PBO without going through a formal consultation.

No protocol-level surveys for California tiger salamanders have been conducted at the project site; however, since the project site is located within 1.3 miles of a known breeding site, supports suitable upland vegetation, and has a potential breeding pond onsite, the project site is considered to have potential to support this species. The proposed development of the site as a neighborhood park would result in the conversion of all suitable habitat areas (4.2 acres) on the site to non-habitat uses. Implementation of the recommended mitigation measures, described below, would ensure compliance with the PBO and reduce potential impacts to California tiger salamanders to a less than significant level.

As described above, the seasonal wetland on the project site provides suitable habitat for three federally listed plant species: Sebastopol meadowfoam, Burke's goldfields, and Sonoma sunshine. Fill of this wetland as a result of the implementation of the Park Master Plan would result in a loss of suitable wetland habitat for these species.

The County will obtain all necessary permits from the U.S. Army Corps of Engineers, North Coast Regional Water Quality Control Board, and California Department of Fish and Wildlife for the fill of the wetland onsite and the loss of wetland and upland habitats for the species covered by the PBO. Permits expected to be required include Section 404 Nationwide Permit (Corps), Section 401 Water Quality Certification (Regional

Board), and an Incidental Take Permit (Section 2081, Department of Fish and Wildlife). Implementation of the recommended mitigation measures, described below, would ensure compliance with the PBO and reduce impacts to special status plant species to less than significant.

Mitigation Measure BIO-1: Prior to the initiation of ground-disturbing activities on the project site, the County shall implement mitigation measures that are acceptable to the Corps, USFWS and CDFW to compensate for the loss of 4.2 acres of California tiger salamander habitat on the project site. Mitigation shall be consistent with the PBO and shall include purchase of credits for California tiger salamander habitat and suitable listed plant habitat at a USFWS- and CDFW- approved mitigation or conservation bank whose service area includes the project site.

Mitigation Measure BIO-2: Prior to the initiation of construction, the County shall have a second year of surveys conducted by a qualified botanist using the protocol established for the Santa Rosa Plain. Depending on the findings of the surveys, the County shall mitigate for impacts to suitable habitat according to the terms of the PBO as follows:

- If the second year of surveys show that the seasonal wetlands onsite do not support listed plants, the County shall purchase credits for listed vernal pool plants at a mitigation bank that includes the project site within its service area (such as the Carinalli-Todd Mitigation Bank). Credits shall be purchased for the loss of suitable rare plant habitat at a ratio of 1.5:1 (preserved: impacted) for all suitable seasonal wetland habitat impacted by the project. The proposed project is expected to result in the fill of 0.45 acres of suitable habitat for listed plants. Credits equivalent to 1.5 times the impacted acreage (0.68 acre) shall be purchased prior to the initiation of ground disturbing activities.
- If listed plants are observed onsite, mitigation requirements as described in the PBO for the species observed onsite shall be met prior to the initiation of ground disturbing activities on the site. This mitigation shall require purchase of credits at a mitigation bank that includes the project site in its service area at a ratio of 2:1 (for Sebastopol meadowfoam) or 3:1 (for Burke's goldfields or Sonoma sunshine) (preserved: impacted, depending on species) for all suitable seasonal wetland impacted directly or indirectly by the project. Assuming an impact area of 0.45 acres, credits equivalent to 0.9 (2:1) to 1.35 (3:1) acres shall be purchased. The credits shall be purchased prior to the initiation of ground disturbing activities.

Mitigation Measure BIO-3: Prior to the initiation of construction on the project site, a qualified biologist (project biologist) shall conduct pre-construction education training for all construction personnel. The purpose of the education/training will be to: (1) provide information regarding California tiger salamander and other sensitive biological resources on and in the vicinity of the project site, (2) outline project-specific avoidance and minimization measures required to avoid impacts to California tiger salamander and other biological resources; and (3) reinforce the importance of confining equipment and personnel to identified work areas. Training

sessions will be required for any new construction personnel before being allowed to access the site.

Mitigation Measure BIO-4: The County shall ensure that the project contractor implement the following avoidance measures for listed species:

- Equipment and personnel will stay within a specified work area and avoid impacts outside of the Development Area.
- All refueling, maintenance, and staging of equipment and vehicles will occur in areas away from receiving waters.
- Measures to maintain water quality and prevent sedimentation will be implemented and are described in the SWPPP.
- Trash will be properly contained and disposed of on-site.
- No pets or firearms will be allowed at the work area.

b) *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 the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Potentially Significant Unless Mitigation Incorporated. No riparian habitat occurs on the project site. The only other sensitive habitat on the site is the seasonal wetland that occurs on Parcel B near West Robles Avenue. As described in Response IV.c. below, the proposed project would result in the permanent fill of 0.45 acre of this jurisdictional feature, and thus a permit from the Corps for placement of fill within jurisdictional areas would be required. Issuance of the permit would also require that the County provide mitigation for impacts to the wetland area. Implementation of the recommended mitigation measures, described below, would reduce potential impacts associated with fill of wetlands to less than significant.

Mitigation: See Mitigation Measure BIO-5.

c) *Would the project have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Potentially Significant Unless Mitigation Incorporated. The proposed project would permanently impact approximately 0.45 acre of seasonal wetland within the project site through the placement of approximately 370 cubic yards of clean soils within the seasonal wetland to bring the elevation to grade. Given that the entirety of the 0.45-acre seasonal wetland feature would be impacted, only direct impacts to jurisdictional features would result from implementation of the proposed project. No indirect impacts to jurisdictional wetlands are likely to occur. Standard erosion control measures would be used to stabilize exposed soils during construction of the Project, as required and described in the Storm Water Pollution Prevention Plan (SWPPP). These measures may

include storm drain inlet protection, straw bales barriers, straw mulching, straw wattles, silt fencing, and revegetation.

Fill of the seasonal wetland area would require permits from the U.S. Army Corps of Engineers (Corps) (Clean Water Act [CWA] Section 404), and the Regional Water Quality Control Board (RWQCB (CWA Section 401). The seasonal wetland on the site is not part of any larger creek system and would not be subject to jurisdiction under the Streambed Alteration Program (Section 1602 of the California Fish and Game Code). Therefore, a 1602 permit for fill of the wetlands would not be required from the California Department of Fish and Wildlife (CDFW).

Implementation of the following mitigation measures would reduce impacts to jurisdictional wetlands to less than significant.

Mitigation Measure BIO-5: Prior to construction, the County shall obtain authorization to fill the jurisdictional area under the Corps' Section 404 Nationwide Permit Program and shall provide mitigation at a ratio of 1:1 for direct impacts to jurisdictional areas. Consistent with Corps policy, the impacts to jurisdictional areas shall be mitigated by purchasing wetland mitigation credits from a mitigation bank in Sonoma County, California.

Mitigation Measure BIO-6: The following measures to control erosion and sedimentation from the proposed project shall be implemented:

- If determined to be necessary, sediment control measures may include inlet protection, straw bale barriers, straw mulching, straw wattles, and other recommendations from the County of Sonoma.
- Disturbance within the project area will be kept to a minimum.
- Immediately after vegetation has been removed, one or more barriers of silt fencing may be installed, if determined to be necessary, at the downslope end of the work area to prevent sediments and debris from washing into the storm drains that lead to downstream water sources. This fencing would be maintained throughout construction, and sediment that settles against it would be removed, as necessary, in order to ensure the continued functioning of the silt fencing as a water filtration measure. If large rainfall events or heavy stream flow are anticipated during the construction period, the fencing may be temporarily removed.
- The soil and rock fill will be compacted to prevent erosion and washouts.
- Periodic inspections will be provided during construction to ensure that all measures are in place.

In addition to these actions, the applicant will prepare and submit an Erosion Control Plan to Sonoma County that will include construction specifications for grading plans, project designs, and other relevant information. The Applicant will comply with any measures outlined by the County of Sonoma, RWQCB, Corps, and California Department of Fish and Wildlife (CDFW) with regard to seasonal water and erosion control issues.

d) *Would the project 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?*

Potentially Significant Unless Mitigation Incorporated. Construction activities on the site could temporarily affect nesting birds both on and adjacent to the site if trees, or other vegetation, containing active nests are removed during the nesting season (February 1 – August 31) or construction activities disturb nesting birds adjacent to the project site resulting in nest abandonment or failure. The nests and eggs of native bird species are protected under the federal Migratory Bird Treaty Act and Section 3503 of the California Fish and Game Code. Trees and shrubs on the project site, if occupied by nesting native birds, would be considered a wildlife nursery site under CEQA. Therefore, destruction or abandonment of an active nest as a result of project related activities would result in direct effects to a wildlife nursery site. Implementation of Mitigation Measure BIO-7 would ensure that potential impacts to protected native bird species, including nesting special-status bird species if present, would be reduced to a less than significant level.

Mitigation Measure BIO-7: If construction is proposed to occur during the nesting season (February 1 through August 31), a qualified biologist shall conduct nesting bird surveys prior to tree pruning, tree removal, ground disturbing activities, or construction activities to locate active nests on or immediately adjacent to the project site.

- Preconstruction surveys shall be conducted no more than 14 days prior to initiation of construction activities or tree trimming/removal. If the project is delayed, additional preconstruction surveys at 14-day intervals shall be completed until project construction is initiated on the site.
- Locations of active nests shall be described and protective measures implemented. Protective measures shall include establishment of clearly delineated (i.e., orange construction fencing) exclusion zones around each nest sites. The exclusion zone shall have a radius of 50 to 250 feet centered on the nest tree. The size of the exclusion zone shall be determined by a qualified biologist and shall take into consideration the bird species and the level of disturbance anticipated near the nest. Typically, exclusion zones for passerines are 50 feet, while those for raptors may be up to 250 feet.
- Active nest sites shall be monitored periodically throughout the nesting season to identify any sign of disturbance. These protection measures shall remain in effect until the young have left the nest and are foraging independently or the nest is no longer active.
- Exclusion zones may be reduced in size, if in the opinion of the project biologist and in consultation with the California Department of Fish and Wildlife, a smaller exclusion zone is determined to adequately protect the active nest. Additional monitoring (i.e., daily) may be required to monitor the behavior of the nesting birds if the exclusion zones are reduced in size. The project biologist shall be responsible for determining if the smaller exclusion zones are effective.

- A report shall be prepared at the end of the construction season detailing the results of the preconstruction surveys and monitoring. The report shall be submitted to the County by November 30 of each year.

e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Potentially Significant Unless Mitigation Incorporated. "Protected trees" in Sonoma County are subject to the County's Tree Protection Ordinance (Section 26-88-010(m) of the Sonoma County Code). Protected trees include: big leaf maple (*Acer macrophyllum)*, black oak (*Quercus kelloggii)*, blue oak (*Quercus douglasii)*, coast live oak (*Quercus agrifolia)*, interior live oak (*Quercus wislizenii)*, madrone (*Arbutus menziesii)*, oracle oak (*Quercus morehus)*, Oregon oak *Quercus garryana*, redwood (*Sequoia sempervirens)*, Valley oak (*Quercus lobata)*, California bay (*Umbellularia California)* and their hybrids.

Development of the proposed park could require the removal of existing trees, including trees potentially considered as "protected" trees under the County's Tree Protection Ordinance. Implementation of Mitigation Measure BIO-8, described below, would reduce potential impacts to "protected" trees to less than significant.

Mitigation Measure BIO-8: The County shall comply with all provisions of the Sonoma County Tree Protection Ordinance, including: protection of trees to remain, replacement of trees to be removed, and protection of "protected" trees during project construction. All trees proposed for removal shall be replaced pursuant to Section 26-88-010 (m) of the Sonoma County Code.

f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or State habitat conservation plan?*

Potentially Significant Unless Mitigation Incorporated. The Santa Rosa Plain Conservation Strategy was never implemented but is "followed" as a strategy. As described above, mitigation for impacts to listed plants and animals will follow the PBO, which is a formal consultation for Corps projects for which a Nationwide Permit is appropriate. Consistency with the PBO would result in consistency with the conservation strategy. With implementation of the mitigation described above, the proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plan and this impact would be less than significant.

V. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?		X		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		X		
c) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		X		
d) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		X		

Affected Environment

An Archaeological Survey Report (ASR) (Alta Archaeological Consulting 2015) was prepared for the proposed project site. The study consists of a records search, literature review and field review. The purposes of the ASR were to: identify and record cultural resources in the study area; and recommend procedures for avoidance or mitigation of adverse effects to potentially significant resources.

Cultural Resources. The ASR identified one previously identified cultural resource (P-49-002834) located adjacent to the project site. No additional resources were documented within one-half mile of the project site. Site P-49-002834, the Northwest Pacific Railroad, runs north/south along the western boundary of the project site. The Northwest Pacific Railroad dates to the late 19th century and remains in active use.

The ties, ballast bed, rails, and crossing at West Robles Avenue, which are modern components of P-49-002834, appear to have been replaced very recently. A drainage swale is present along the eastern side of the raised railroad grade.

No other cultural resources in or adjacent to the project area were identified as a result of the literature and field survey. Although unanticipated discoveries cannot be ruled out (as discussed below), the project area has a low potential to contain cultural resources.

Paleontological Resources. The paleontological sensitivity of the project site was assessed by reviewing the Geologic Map and Map Database of Eastern Sonoma and Western Napa Counties, California (Graymer, R.W., E.E. Brabb, D.L. Jones, J. Barnes, R.S. Nicholson, and R.E. Stamski 2007). The geological map identifies the project site as consisting of Holocene Epoch (11,800 years ago to present) Alluvium. Holocene-aged

deposits are too young to contain fossil resources and the project site is therefore not sensitive for fossil resources.

Discussion

a) *Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?*

Potentially Significant Unless Mitigation Incorporated. As described above, the literature review identified one cultural resource adjacent to the project site: P-49-002834, the Northwest Pacific Railroad. P-49-002834 runs north/south along the western boundary of the project site. According to the ASR (Alta Archaeological Consulting 2015), implementation of the proposed project would not affect the railroad tracks, nor is it expected to impact other cultural resources.

Despite the negative findings of the ASR (Alta Archaeological Consulting 2015), the possibility exists that unanticipated cultural resources may be encountered during project construction. Impacts to such resources, should they qualify as historical resources, would constitute a significant impact under CEQA.

Prehistoric resources include, but are not limited to, chert or obsidian flakes, projectile points, mortars, pestles, and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic resources include stone or abode foundations or walls; structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies.

Implementation of Mitigation Measure CULT-1, described below, would reduce potential impacts from construction activities to less than significant. The reduction would be achieved either through the avoidance of direct impacts to identified resources, or evaluation and treatment of such resources in a manner that recovers scientifically consequential data that would otherwise be lost through disturbance.

> **Mitigation Measure CULT-1:** If prehistoric or historic-period archaeological deposits are identified during construction, project-related impacts to such resources shall be avoided, if feasible. An attempt at impact avoidance shall be undertaken in consultation a professional archaeologist. If avoidance is not feasible, the deposits shall be evaluated to determine if they qualify as historical resources under California Public Resources Code §21084.1 and §21083.2.
>
> If the evaluation determines that the deposit is neither a historical nor unique archaeological resource, the avoidance of potential impacts to the deposit is not necessary. If the deposit does qualify under either resource category, impacts to the resource shall be mitigated. Mitigation may consist of excavating the archaeological deposit in accordance with a data recovery plan (see *CEQA Guidelines* §15126.4(b)(3)(C)) developed in consultation with descendant community representatives (as warranted); recording the resource; preparing a report of findings; and accessioning recovered archaeological materials at an appropriate curation facility. Public educational outreach may also be

appropriate. Upon completion of the evaluation and, if necessary, mitigation, the archaeologist shall prepare a draft report to document the methods and results of the investigation(s). The draft report shall be submitted to the SCRP, the descendant community involved in the investigation(s), and the Northwest Information Center.

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

Potentially Significant Unless Mitigation Incorporated. As described above in Response V.a., P-49-002834, the Northwest Pacific Railroad, runs north/south along the western boundary of the project site. Implementation of the proposed project would not affect the railroad tracks, nor is it expected to impact other cultural resources.

Due to the same potential, albeit low, for encountering unanticipated cultural resources during construction, the project may result in significant impacts to unique archaeological resources.

Implementation of Mitigation Measure CULT-1, described previously, would reduce potential impacts from construction activities to less than significant. The reduction would be achieved either through the avoidance of direct impacts to identified resources, or evaluation and treatment of such resources in a manner that recovers scientifically consequential data that would otherwise be lost through disturbance.

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

Potentially Significant Unless Mitigation Incorporated. Given the nature of project construction and the relatively shallow depth of excavation required, it is unlikely that paleontological resources would be encountered. Though unlikely, this possibility cannot be entirely discounted. If encountered, such resources could qualify as significant for the scientific data they contain relating to ancient life, in which case their disturbance could possibly result in a significant impact.

Implementation of Mitigation Measure CULT-2, described below, would reduce potential impacts from construction activities to less than significant. The reduction would be achieved either through the avoidance of direct impacts to identified resources, or evaluation and treatment of such resources in a manner that recovers scientifically consequential data that would otherwise be lost through disturbance.

> **Mitigation Measure CULT-2:** Should paleontological resources be encountered during project subsurface construction activities, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with SCRP representatives, and make recommendations for the treatment of the discovery. If the find is determined to be significant, and project activities cannot avoid impacting the resource, the impact to the resource shall be mitigated in accordance with the recommendations of the consulting paleontologist. Mitigation may include

monitoring, recording the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Public educational outreach may also be appropriate. Upon completion of the assessment, a report documenting methods, findings, and recommendations of the investigation shall be prepared and submitted to the SCRP, and, if paleontological materials are recovered, a paleontological repository, such as the University of California Museum of Paleontology.

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

Potentially Significant Unless Mitigation Incorporated. No human remains have been identified on the project site and it is unlikely that human remains are present within the project site. Though unlikely, it is possible that remains that were not identified by previous cultural resources studies could be discovered during construction. If encountered, such resources could be disturbed, which would result in a significant impact to human remains.

Implementation of Mitigation Measure CULT-3, described below, would reduce potential impacts from construction activities to less than significant. The reduction would be achieved through the adherence to the requirements of California Health and Safety Code Section 7050.5 (as summarized below) and the treatment of such remains in a respectful manner, with the input of descendant communities.

Mitigation Measure CULT-3: If human remains are encountered during project construction, work within 25 feet of the discovery shall be redirected and the Sonoma County Coroner notified immediately. At the same time, the archaeologist who served as monitor or consulting archaeologist shall be contacted to assess the situation, in consultation with the descendant community also involved with the pre-construction testing, as well as the Coroner's representative. Project personnel shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the Coroner shall notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Most Likely Descendant (MLD), which will likely be the representative of the descendant community already involved, to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods. Upon completion of the assessment, the archaeologist shall prepare a report documenting the investigation's methods and results, and provide recommendations for the treatment of the human remains and any associated cultural materials, as appropriate and in coordination with the recommendations of the MLD. The draft report shall be submitted to the SCRP, the descendant community involved in the treatment of the resources, and the Northwest Information Center.

VI. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?		X		
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?		X		
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?				X

Affected Environment

The project site is located on the Santa Rosa Plain in Central Sonoma County within the Coast Range Geomorphic Province of Northern California. This province is generally characterized by northwest-trending mountain ranges and intervening valleys, which are a reflection of the dominant northwest structural trend of the bedrock in the region.

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).

Geologic mapping indicates the area underlying the project site is composed of Holocene-aged alluvium and Pleistocene-aged undifferentiated continental deposits of gravel, sand, silt and clay (Environmental Geology Services, Inc. 2015). Soils underlying the project site are composed of Wright loam, shallow, wet, 0 to 2 percent slopes (WoA) according to the United States Department of Agriculture (USDA) National Resources Conservation Service's Web Soil Survey (NRCS 2015). The Wright series soils are clayey and have very slow infiltration rates (Hydrologic Group D), a high unconfined water table, are poorly drained and have a high potential for corrosion of steel. Permeability is very slow, runoff is very slow and the hazard of erosion is none to slight (United States Department of Agriculture, Forest Service and Soil Conservation Service 1972). According to the Phase I Environmental Site Assessment (Environmental Geological Services, Inc. 2015), the northeast portion of Parcel B appears to have a few feet of fill (based on topography and vegetation).

Discussion

a) *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*

   i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

   No Impact. Surface rupture occurs when the ground surface is broken due to fault movement during an earthquake. The location of surface rupture generally can be assumed to be along an active or potentially active major fault trace. The site is not located within a currently designated Alquist-Priolo Earthquake Fault Zone; therefore, the potential for fault rupture at the site is low. The proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault.

   ii) *Strong seismic ground shaking?*

   Potentially Significant Unless Mitigation Incorporated. The project site and the entire San Francisco Bay Area is in a seismically active region subject to strong seismic ground shaking. Ground shaking is a general term referring to all aspects of motion of the earth's surface resulting from an earthquake, and is normally the major cause of damage in seismic events. The extent of ground-shaking is controlled by the magnitude and intensity of the earthquake, distance from the epicenter, and local geologic conditions. As described above, the major active faults in the County that could cause ground shaking at the project site include the San Andreas Fault, Healdsburg, Rodgers Creek, and Mayacamas faults. According to Figure PS-1a of

the Sonoma County General Plan 2020 (Sonoma County 2008), the project site is located in an area of "very strong" ground shaking probability.

The most significant adverse impact associated with strong seismic shaking is potential damage to structures and improvements. No habitable structures would be constructed as part of the proposed project; however, implementation of proposed improvements would increase the use of the project site. Although the proposed project would be designed and constructed consistent with the most current earthquake resistance standards for Seismic Zone 4 in the California Building Code (CBC), which includes specifications for site preparation, such as compaction requirements for foundations, proposed development under the Master Plan would include construction of improvements in areas subject to seismic shaking. Implementation of the following mitigation measure would reduce potential impacts associated with ground shaking to less than significant.

> **Mitigation Measure GEO-1:** Prior to grading, excavation, and construction of any improvements under the Master Plan, a design-level geotechnical report shall be prepared by a licensed professional and submitted to Sonoma County Parks staff for review and approval. The geotechnical review shall specifically address potential adverse geological conditions at the site, including but not limited to expansive soils and seismic shaking and verify that the project plans incorporate the current California Building Code requirements, and other applicable design standards. All design measures, recommendations, design criteria, and specifications set forth in the design-level geotechnical review shall be implemented as a condition of project approval.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is the transformation of saturated, loose, fine-grained sediment to a fluid-like state because of earthquake shaking or other rapid loading. Soils most susceptible to liquefaction are loose to medium dense, saturated sands, silty sands, sandy silts, non-plastic silts and gravels with poor drainage, or those capped by or containing seams of impermeable sediment. The project site is located in an area with liquefaction potential considered to be low (Sonoma County 2008). The proposed project would be designed and constructed consistent with the most current earthquake resistance standards for Seismic Zone 4 in the California Building Code (CBC), which includes specifications for site preparation, such as compaction requirements for foundations. Compliance with these provisions would reduce impacts associated with liquefaction to a less than significant level.

iv) Landslides?

Less Than Significant Impact. The proposed project is located on gently sloping terrain and the potential for landslide is low. The project would not result in any new habitable structures and therefore would not expose people or structures to potential substantial adverse effects from landslides.

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

Less Than Significant Impact. As described above, the erosion potential of the soils at the project site is none to slight. However, construction activities have the potential to disrupt soil and cause erosion. Construction specifications require the preparation of a Stormwater Pollution and Prevention Plan (SWPPP) prior to any ground disturbance activities as required by the National Pollutant Discharge Elimination System (NPDES) General Permit (GP) for Construction (Order 2009-009-DWQ). The SWPPP will provide the details of the erosion control measures to be applied on the project site during the construction period, including Best Management Practices (BMPs) for erosion control that are recognized by the Regional Water Quality Control Board (RWQCB). Implementation of a SWPPP would reduce potential impacts to soil erosion or the loss of topsoil to a less than significant level.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. As described above, the potential for hazard from landslide is low and the potential for liquefaction is low. The project site is not located on Karst formations and has not been subjected to mining activities; thus, the risk of subsidence or collapse is expected to be low. The proposed project would be designed and constructed with adequate foundations and bedding in accordance with the CBC and standard engineering practices to address the possible effects of unstable soils. Therefore, this impact would be less than significant.

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

Potentially Significant Unless Mitigation Incorporated. Expansion and contraction of volume can occur when expansive soils undergo alternating cycles of wetting (swelling) and drying (shrinking). During these cycles, the volume of the soil changes markedly. Expansive soils are common throughout California and can cause damage to foundations and slabs unless properly treated during construction. The Wright loam soil series is considered slightly to highly expansive. Standard construction methods would be employed including appropriate selection of backfill materials that do not exhibit expansive behavior. Implementation of Mitigation Measure GEO-1, described above, would reduce potential impacts related to expansive soils to less than significant.

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

No Impact. Septic tanks and alternative wastewater disposal systems would not be installed on the project site. Therefore, implementation of the proposed project would not result in impacts to soils associated with the use of such wastewater treatment systems.

VII. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?			X	
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?				X

Affected Environment

Unlike emissions of criteria and toxic air pollutants, which have local or regional impacts, emissions of greenhouse gases (GHGs) contribute to global climate change and have a broader global impact. Global climate change is a process whereby GHGs accumulating in the atmosphere contribute to an increase in the temperature of the earth's atmosphere. The principal GHGs contributing to global climate change are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated compounds. These gases allow visible and ultraviolet light from the sun to pass through the atmosphere, but they prevent heat from escaping back out into space. Among the potential implications of global climate change are rising sea levels, and adverse impacts to water supply, water quality, agriculture, forestry, and habitats. In addition, global warming may increase electricity demand for cooling, decrease the availability of hydroelectric power, and affect regional air quality and public health. Like most criteria and toxic air pollutants, much of the GHG production associated with development projects comes from motor vehicles. GHG emissions can be reduced to some degree by improved coordination of land use and transportation planning on the city, county and subregional level, and other measures to reduce automobile use. Energy conservation measures can also contribute to reductions in GHG emissions.

The *BAAQMD CEQA Guidelines* recommend that all GHG emissions from a project be estimated, including a project's direct and indirect GHG emissions from operations. The BAAQMD does not have an adopted Threshold of Significance for construction-related GHG emissions.

GHG emissions associated with implementation of the proposed project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust. Long-term GHG emission associated with the park would be associated with vehicle trips traveling to and from the project site.

Discussion

a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?*

Less Than Significant Impact. GHG emissions associated with implementation of the proposed project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust. Operational emissions would occur from park maintenance staff and park visitors.

Short-Term GHG Emissions. Construction would produce combustion emissions from various sources. During demolition, site preparation and construction of the project, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change. As described in Section III b, the proposed project would require the operation of approximately 2-3 pieces of equipment at any given time during the construction period. The project would develop approximately 4.2 acres of undeveloped land to a city park. The BAAQMD doesn't provide screening threshold for construction-related GHG emissions however, emissions would be expected to be minimal and limited to the duration of the construction period. Additionally, with implementation of Mitigation Measure AIR-1, potential construction emissions would be considered less than significant.

Long-Term GHG Emissions. Long-term operation of the proposed project would generate GHG emissions from area and mobile sources, and indirect emissions from sources associated with energy consumption. Mobile-source emitters of GHGs would include project-generated vehicle trips associated with visitor trips to the project site. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site, and other sources.

The BAAQMD operational GHG screening size for a city park is 600 acres. The proposed project is approximately 4.2 acres and is well below this screening level. Therefore, the proposed project would not be expected to result in a substantial increase in the generation of GHG emissions.

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

No Impact. As indicated above, the project would not generate significant operational or construction GHG emissions. Therefore, the proposed project would be consistent with all the applicable local plans, policies and regulations and would not conflict with the provisions of AB 32, the applicable air quality plan, or any other State or regional plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions.

The Sonoma County Community Climate Action Plan adopted in October 2008, establishes the following sectors as the major sources of GHG emissions: electricity and natural gas, transportation, agriculture, and solid waste (Sonoma County 2008). The proposed project would not generate substantial GHG emissions that would inhibit the County to reach the reduction goals for these sectors. Therefore, the proposed park would not conflict with the Climate Action Plan.

VIII. HAZARDS

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		X		
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		X		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 1/4 mile of an existing or proposed school?				X
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?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
f) For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X

Affected Environment

The information contained in this section of the Initial Study is based on the findings of the Phase I Environmental Site Assessment (ESA) prepared by Environmental Geology Services, Inc. (EGS) for the project site in July 2015 (EGS 2015).

A review of historical topographic maps and historic aerial photography indicates that Parcel B and portions of Parcel A had agricultural development in the form of an orchard dating back to at least 1942 and likely earlier. Other small-scale agricultural uses may have been conducted on the project site through the 1980s. The Northern Pacific Railroad tracks have existing along the western boundary of the project site through the entire period documented by the historical maps (78 years). Parcel A along Moorland Avenue was developed for residential use (e.g., farmhouse) dating back to at least 1942.

Due to historic agricultural use of the site, pesticides and herbicides may be present in site soils. Further, the Northwestern Pacific Railroad tracks have existing along the western boundary of the site since before 1916, which indicates the potential for wood preservatives such as arsenic and creosote, heavy metals, and herbicides. The source of the fill material in the northeastern portion of Parcel B is unknown and may contain contaminants. In addition, the prior farm house on Parcel A may have had a well associated with it, as well as a septic tank, and possibly a fuel oil tank.

At the time of the site reconnaissance, the project site was vacant with the exception of the following:

- Parcel A contained a number of informal foot paths/trails, an informal tent-like memorial structure, a number of play structures, miscellaneous pieces of furniture, and three car tires.
- Parcel B contained a number of scattered apple and oak trees, some wood debris, and an apparent homeless camp site.

A review of federal, state, and local agency databases identified four hazardous materials release sites within 1,000 feet of the project site. Three of these sites have been closed by regulatory agencies, indicating that investigation and remediation of the sites is complete. One site, Empire Waste Management, at 3400 Standish Avenue, consists of a permitted Underground Storage Tank (UST) with no reported open case. No active or historical environmental investigations are documented at the project site.

Discussion

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

Potentially Significant Unless Mitigation Incorporated. The proposed land use would be a park. Normal operations would not introduce potentially hazardous materials. As outlined in the project description, the turf areas would require typical maintenance such as fertilizer and irrigation. California law requires all businesses that use or store more than certain quantities of hazardous materials on-site to file hazardous materials

business plans that list and map the location of onsite hazardous materials storage and use and that describe procedures in the event of an accident. Compliance with this law would reduce potential impacts to a less than significant level.

While gas and diesel fuel would typically be used by construction vehicles, Best Management Practices (BMPs) would be utilized to ensure that no construction-related fuel hazards occur. Use, storage, transport and disposal of hazardous materials (including any hazardous wastes) during construction activities would be performed in accordance with existing local, state, and federal hazardous materials regulations.

As described above, the Phase I ESA determined that soils and groundwater on the project site could contain residual pesticides associated with historic agricultural uses, contaminants associated with historic railroad construction and operations, and other contaminants associated with the fill soils and/or the historic use of the site for residential use (e.g., septic tank, fuel oil tank). If soils and groundwater are not properly managed during construction, exposure to these hazardous materials could pose a health hazard to construction workers. Exposure to contaminants in soil or groundwater could occur through inhalation of fugitive dust, incidental ingestion, or dermal contact with contaminated material. Implementation of Mitigation Measures HAZ-1 and HAZ-2 described below would reduce the potential health hazard impacts from the exposure of construction workers to contaminated material present in soil and groundwater to less than significant.

Mitigation Measure HAZ-1: Project construction plans shall include emergency procedures for responding to hazardous materials releases including the necessary personal protective equipment, spill containment procedures, and training of workers to respond to accidental spills/releases. All use, storage, transport and disposal of hazardous materials (including any hazardous wastes) during construction activities shall be performed in accordance with existing local, state, and federal hazardous materials regulations.

Mitigation Measure HAZ-2: Prior to construction, a shallow soil sampling plan shall be prepared and implemented to evaluate the potential for impacts from pesticides, herbicides, heavy metals, and wood preservatives. The soil sampling plan shall be conducted by a California Professional Geologist and/or a California Professional Civil Engineer with experience in contaminated site investigation. The sampling plan shall be submitted to the County for review and approval before construction.

Sampling for agricultural chemicals shall be conducted in accordance with Department of Toxic Substance Control's (DTSC) Interim Guidance for Sampling Agricultural Properties (Third Revision, dated 30 April 2008). A further investigation of the former farm house area on Parcel A shall also be conducted to determine if there are subsurface elements such as a septic system, underground fuel storage tank (UST) or a well, so that if present, these can be addressed prior to development. In the event that the soil sampling indicates the presence of contaminants above relevant health screening levels, all recommendations contained in the Phase II Environmental Site Assessment (e.g., soil removal or remediation) shall be implemented by the County.

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

Potentially Significant Unless Mitigation Incorporated. As described in Section VII.a., construction of the proposed project would require use of hazardous materials and the potential release of contaminants associated with ground disturbing activities. Implementation of appropriate mitigation measures would reduce impacts during the construction period to a less than significant level.

c) *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 1/4 mile of an existing or proposed school?*

No Impact. The project site is not located within ¼ mile of an existing or proposed school. The closest school is Bellevue Elementary School, approximately 0.75 mile from the project site. Therefore, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school.

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

No Impact. The project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?*

No Impact. The project site is not located within an airport land use plan, or within two miles of a public airport or public use airport. The closest airport to the project site is the Sonoma Valley Airport, approximately 9 miles northwest. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels.

f) *For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

No Impact. The project site is not in the vicinity of a private airstrip. Therefore, implementation of the proposed project would not expose persons to airport-related hazards.

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

No Impact. The proposed project would replace/improve an existing recreational facility, located in an isolated, rural area. It is not located along an identified evacuation route, nor would it affect local roadways. The proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The project site is located in an area of low wildland fire threat (Sonoma County 2008). Implementation of the proposed project would not change the degree of exposure to wildfires, because no new housing or businesses would be constructed. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires.

IX. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?			X	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			X	
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X	
e) 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?			X	
f) Otherwise substantially degrade water quality?			X	
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				X
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding of as a result of the failure of a levee or dam?			X	

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
j) Inundation by seiche, tsunami, or mudflow?			X	

Affected Environment

The project site is located in central Sonoma County within the Laguna de Santa Rosa watershed, which covers 254 square miles and is a sub-watershed to the Russian River watershed. Major tributaries to the Laguna de Santa Rosa include Windsor Creek, Mark West Creek, Santa Rosa Creek, Blucher Creek, and Copeland Creek. The nearest primary surface water body to the project site is a channelized tributary to the Laguna de Santa Rosa, approximately one mile west of the project site.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map Index (Map Number 06097CIND0D) for Sonoma County, the site is located within Map Panel 06097C0738F (FEMA 2012). According to this map, the project site is not located within a special flood hazard area. Areas of Sonoma County would be subject to flooding associated with potential failure of dams located throughout the County. However, the project site is located outside the dam inundation area for all three of these dams (Sonoma County 2008).

The current 2010 Clean Water Act Section 303(d) List of Impaired Waters (2010 303(d) List) divides the Laguna de Santa Rosa watershed into three water bodies as follows: Laguna de Santa Rosa, Mark West Creek, and Santa Rosa Creek. The North Coast Regional Water Quality Control Board (RWQCB) has classified these three water bodies as impaired due to sedimentation/siltation, temperature, indicator bacteria, mercury, dissolved oxygen, nitrogen, and phosphorus.

Water quality is regulated by the US Environmental Protection Agency's National Pollution Discharge Elimination System (NPDES), which controls the discharge of pollutants to water bodies from point and non-point sources. In the Bay Area, this federal regulatory program is administered by RWQCB, which was expanded in 1990 to include permitting of stormwater discharges from storm sewer systems, industrial activities and construction sites that disturb more than 1 acre. The RWQCB permit for local construction sites like the project requires that individual landowners bear the responsibility for compliance.

The general NPDES stormwater permits for general industrial and construction activities require an applicant to file a public notice of intent (NOI) with the applicable RWQCB to discharge stormwater and prepare and implement a storm water pollution and prevention plan (SWPPP). The SWPPP includes a site map, description of stormwater discharge activities, and best management practices that would be employed to prevent water pollution. The SWPPP for general construction activity permits must describe Best Management Practices (BMPs) that would be used to control soil erosion and discharges of other construction-related pollutants that could contaminate nearby water resources.

The project site is located within the Santa Rosa Valley Groundwater Basin, which extends over an area of 150 square miles. The Santa Rosa Valley Groundwater Basin has three sub-basins: the Healdsburg sub-basin, the Santa Rosa Plain sub-basin, and the Rincon Valley sub-basin. The Santa Rosa Valley occupies a northwest-trending structural depression in the southern part of the Coast Ranges of northern California. This depression divides the Mendocino Range on the west from the Mayacamas and Sonoma Mountains on the east (California Department of Water Resources 2004).

Discussion

a) Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. The proposed project, the improvement of the project site as a neighborhood park, would not violate water quality standards or discharge requirements. However, the proposed project could potentially result in short-term (construction) water quality impacts.

Long-Term Operational Impacts. The proposed park master plan would include design features that would protect water quality and retain potential runoff on-site. The large natural area proposed for Parcel B is intended to provide natural habitat and serve as a stormwater infiltration area to collect and infiltrate stormwater. This area may briefly hold water during wet periods, and would appear dry during dry periods with native and naturalizing vegetation.

The proposed project would be required to comply with Sonoma County regulations related to stormwater runoff, including implementation of post-construction stormwater management and the requirements of the NPDES Phase 1 Term 4 Municipal Separate Storm Sewer System (MS4) permit (Phase 1 MS4 Permit; Order No. R1-2009-0050; NPDES No. CA0025054), which covers the City of Santa Rosa and unincorporated areas near the cities of Healdsburg, Windsor, Santa Rosa, Rohnert Park, Cotati and Sebastopol.

The Phase I MS4 Permit requires all new development projects creating or replacing a combined total of 1.0 acre or more of impervious surface to implement post-construction treatment controls to mitigate all project-related storm water pollution. The Phase I MS4 Permit also requires implementation of Low Impact Development (LID) standards. LID uses design techniques such as harvest and reuse, infiltration, evapotranspiration to mimic a site's pre-development hydrology.

The Phase 1 MS4 Permit requires regulated projects (which includes implementation of the Master Plan) to include facilities designed to evapotranspire, infiltrate, harvest/use, and biotreat stormwater to meet at least one of the hydraulic sizing design criteria included in the permit. To comply with the Phase 1 MS4 Permit, a Storm Water Mitigation Plan (SWMP) that provides pre- and post-development runoff calculations and project specific Best Management Practices (BMPs) must be prepared and implemented.

Since LID measures would be required under existing NPDES regulations and these measures encourage reuse, infiltration, and bioretention so that site hydrology is not substantially altered, long-term operation of the proposed project would have a less than significant impact on water quality.

Construction-Related Impacts. Disturbance during construction would result in erosion and associated discharge of additional sediment and/or other pollutants. The National Pollutant Discharge Elimination System General Permit (GP) for Construction (Order 2009-009-DWQ) requires construction sites over one acre that do not qualify for a waiver to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP shall incorporate Best Management Practices (BMPs) to control sedimentation and runoff. These measures would be consistent with the application for a stormwater permit from the RWQCB. Compliance with the NPDES Permit is mandated by State and federal laws and new construction projects are required to comply with storm water general permits. Consistent with the GP, the SWPPP shall adhere to the following requirements:

- The SWPPP shall include measures to avoid creating contaminants, minimize the release of contaminants, and water quality control measures to minimize contaminants from entering surface water or percolating into the ground during and following the completion of construction.
- Fluvial erosion and water pollution related to construction shall be controlled by the SWPPP and kept current throughout all site development phases.
- The SWPPP shall include BMPs, as appropriate, given the specific circumstances of the site and project.
- The SWPPP shall be submitted to the RWQCB in compliance with the requirements of the GP.
- A spill prevention and countermeasure plan shall be incorporated into the SWPPP.

With the SWPPP in place, impacts related to degradation of water quality during construction would be less than significant.

b) *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?*

Less Than Significant Impact. The proposed project would not result in the construction of large areas of impervious surfaces that would prevent water from infiltrating into the groundwater nor would it result in direct additions or withdrawals to existing groundwater. Therefore, this impact is considered less than significant.

c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?*

Less Than Significant Impact. The proposed project would alter the existing drainage patterns on the site by increasing impervious surfaces by approximately 45,625 square feet (1.05 acre). However, the proposed project would provide site features to maximize water infiltration and minimize any stormwater runoff that might result in substantial erosion or siltation on- or off-site. Runoff would be treated and managed through the infiltration area, with the goal of maximizing water infiltration on the project site. As described above in Response IX(a), during construction BMPs would be implemented so that on-site and off-site erosion and sedimentation would be controlled to the extent practicable. Therefore, this impact would be less than significant.

d) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

Less Than Significant Impact. No long term alteration of the drainage pattern of the project site or area would result from implementation of the proposed project. The proposed project would result in an increase of approximately 45,625 square feet (1.05) acre of impervious surfaces. However, the proposed project would provide site features to maximize water infiltration and minimize any stormwater runoff that might result in flooding on- or off-site. As described above, the proposed project would be required to comply with Sonoma County regulations and the requirements of the Phase II General Municipal Separate Storm Sewer System (MS4) permit for managing stormwater runoff. Compliance with these regulations would ensure that operation of the proposed project would not substantially increase the rate or manner of surface runoff, which would result in flooding on- or off-site. During construction, BMPs would be implemented, consistent with the GP, so that surface runoff would be controlled to the extent practicable. Therefore, this impact would be less than significant.

e) *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?*

Less Than Significant Impact. See Response IX(d).

f) *Otherwise substantially degrade water quality?*

Less Than Significant Impact. See Response IX(a).

g) *Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?*

No Impact. No housing units are proposed as part of the project. Therefore, the proposed project would have a less than significant impact related to the placement of housing within a 100-year flood hazard area.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. As described above, the project site is not located within a FEMA 100-year flood zone. The proposed project does not include the construction of any structures that could impede or redirect flows. Therefore, this impact would be less than significant.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding of as a result of the failure of a levee or dam?

Less Than Significant Impact. The proposed project site is not located in the inundation area for any levee or dam in the project vicinity (Sonoma County 2008) nor is it located within a 100-year flood hazard zone. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. This impact would be less than significant.

j) Inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. Seiches are caused when earthquake ground motions cause water to oscillate from one side to the other of a closed or partially closed body of water such as a lake, bay or reservoir. Such waves can result in damage to structures along the edges of these water bodies. Shoreline areas along Bodega Harbor, Lake Sonoma and similar enclosed bodies of water in Sonoma County are subject to impacts from seiches. As the proposed project is not located along one of these enclosed bodies of water; the proposed project would not be subject to inundation by seiche.

Tsunamis, or seismic tidal waves, are caused by off-shore earthquakes that can trigger large, destructive sea waves. The project site is not located within a tsunami inundation area (California Emergency Management Agency, University of Southern California and the California Geological Survey 2009). Therefore, there is no risk of inundation by tsunami.

Mudflows typically occur in mountainous or hilly terrain. The topography of the project area is generally flat with no active landslides in the project area. Therefore, the potential for inundation by mudflow is less than significant.

X. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction of the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			X	
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?		X		

Affected Environment

The project site is located within an unincorporated area of Sonoma County south of the City of Santa Rosa. The project site is a 4.22-acre parcel of undeveloped property that is comprised of two separate parcels divided by Horizon Way. The larger parcel is 3.18 acres and the smaller parcel is 1.04 acres. Moorland Avenue bounds the property on the east, and the Sonoma Marin Area Rail Transit (SMART) track is on the west boundary. West Robles Avenue bounds the project site on the south, and the curving Horizon Way and adjacent houses are located to the north. Commercial/industrial development is located south and west of the project site.

The project site is located within unincorporated Sonoma County and is subject to the land use and zoning designations of the Sonoma County General Plan 2020 (Sonoma County 2008) and relevant portions of the Sonoma County Code Zoning Regulations Chapter 26 (Sonoma County 2014). Sonoma County designates the site as Urban Residential. The Urban Residential designation is intended to accommodate a variety of housing types depending on the density allowed. Primary land uses are single-family, clustered and attached housing units and affordable housing project. Permitted residential density ranges from one to twenty units per gross acre; the permitted density at the project site is 5 dwelling units per acre.

The Sonoma County Zoning Code specifies that Parcel A is zoned Low Density Residential District – Valley Oak Habitat Combining District (R1 B7 VOH); Parcel B is zoned Low Density Residential District – Riparian Corridor Combining Zone – Valley Oak Habitat Combining District (R1 B7 RC 100/25 VOH). Permitted uses within the R1 district include: one dwelling unit per lot; small residential care facility; accessory buildings; one second unit per lot, occasional cultural events; outdoor growing and harvesting of shrubs, plants, flowers and similar food crops; day care; bee keeping; and telecommunications facilities. Public

playgrounds, parks, community centers, libraries and similar uses and buildings are permitted with a Use Permit.

The Valley Oak Habitat Combining District is intended to protect and enhance valley oaks and valley oak woodlands and to implement the provisions of the General Plan Resource Conservation Element. Per Section 26-67-030 of the Sonoma County Code, removal of valley oaks within the VOH district requires mitigation by one of the following measures: 1) preserving other valley oaks on the site; 2) planting replacement valley oaks on the site or on a similar site; or 3) paying an in-lieu fee to be used for planting valley oaks within the County.

The Riparian Corridor Combining Zone is established to protect biotic resource communities, including critical habitat areas within and along riparian corridors for their habitat and environmental value. Although the project site is located within the Riparian Corridor Combining Zone, no creeks or streams are located in the site vicinity and no riparian vegetation has been identified on the project site (WRA 2015a).

Discussion

a) *Physically divide an established community?*

No Impact. The physical division of an established community typically refers to the construction of a physical feature (such as an interstate highway or railroad tracks) or removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and outlying areas. The proposed project would construct a neighborhood park in an existing residential neighborhood. The proposed project would not physically divide an established community.

b) *Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

Less Than Significant Impact. According to the Sonoma County General Plan 2020 (2008), the project site has a land use designation of Urban Residential. The Sonoma County Zoning Code (2014) specifies that the parcel is zoned Low Density Residential with Valley Oak Habitat Combining District and Riparian Corridor Combining Zone. The proposed project would construct a neighborhood park, which is permitted under the County's zoning ordinance with a Use Permit.

The proposed project would contribute to implementing the County's General Plan 2020 (2008) goals and policies related to the provision of parks and recreation facilities, specifically:

> **GOAL PF-2:** Assure that park and recreation, public education, fire suppression and emergency medical and solid waste services, and public utility sites are available to meet future needs of Sonoma County residents.

Objective PF-2.1: Provide an adequate supply and equitable geographic distribution of regional and local parks and recreation services based on population projections.

Objective PF-2.2: Use the National Recreation and Parks Administration (NRPA) standards as the minimum standards for determining park needs.

Additional relevant policies relate to the protection of natural resources, water quality, cultural resources, visual resources, air quality, public safety from natural and human-caused hazards, provision of public services, noise and traffic. Many of the project impacts related to these topics are less than significant or are limited to the short-term construction phase of the project as described in the relevant sections of this document. With implementation of the mitigation measures contained in this document, the proposed project is consistent with all the relevant regulations and policies contained in these documents. This impact would be less than significant.

c) *Conflict with any applicable habitat conservation plan or natural community conservation plan?*

Potentially Significant Unless Mitigation Incorporated. The proposed project would not conflict with the provisions of an adopted or other approved local, regional, or state habitat conservation plan or natural community conservation plan. The Santa Rosa Plain Conservation Strategy was never implemented but is “followed” as a strategy.

Implementation of the mitigation measures described in Section IV, Biological Resources would ensure consistency with the programmatic biological opinion and reduce potential impacts to a less than significant level.

XI. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				X
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?				X

Affected Environment

Minerals are any naturally occurring chemical element or compound, or groups of elements and compounds, formed from inorganic processes and organic substances including, but not limited to, coal, peat and oil bearing rock, but excluding geothermal resources, natural gas and petroleum. Rock, sand, gravel and earth are also considered minerals by the Department of Conservation when extracted by surface mining operations. The project site is not located in a designated mineral resource area (Sonoma County Permit and Resources Management Department).

Discussion

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

No Impact. No known mineral resources are located on or near the project site. Therefore, the proposed project would not result in the loss of availability of a known mineral resource.

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

No Impact. See XI(a), above.

XII. NOISE

Would the project result in:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?			X	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?				X
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X

Affected Environment

Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, or sleep. Several noise measurement scales exist that are used to describe noise in a particular location. A *decibel* (dB) is a unit of measurement that indicates the relative intensity of a sound. The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3.0 dB or less are only perceptible in laboratory environments. Audible increases in noise levels generally refer to a change of 3.0 dB or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. Sound levels in dB are calculated on a logarithmic basis. An increase of 10 dB represents a 10-fold increase in acoustic energy, while 20 dB is 100 times more intense, and 30 dB is 1,000 times more intense. Each 10 dB increase in sound level is perceived as approximately a doubling of loudness. Sound intensity is

normally measured through the *A-weighted sound level* (dBA). This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive.

The primary existing noise source in the project area is vehicle traffic on roadways in the project area. The level of vehicular noise generally varies with the volume of traffic, the number of trucks or buses, the speed of traffic, and the distance from the roadway. Roadways surrounding the project site that could contribute to ambient noise in the project site vicinity include Highway 101, located approximately 600 feet to the east, West Robles Avenue bordering the site to the south, Moorland Avenue bordering the site to the east, and Horizon Way intersecting the site. According to the Noise Element of the Sonoma County General Plan 2020 (Sonoma County 2008), the Northern Pacific Railroad (NPRR) tracks located to the west are not operating at this time.

According to the Sonoma County General Plan 2020 (Figure NE-1, Location of Significant Noise Sources and Noise Monitoring Sites), the project site is located near a noise-impacted road segment and industrial land uses. The Sonoma County General Plan 2020 Draft EIR (Draft EIR) (Sonoma County Permit and Resource Management Department 2006) identifies roadway noise generated from Highway 101 at Todd Road, south of the project site, as 60 dBA L_{dn} at 1,468 feet and 65 dBA L_{dn} at 682 feet from the roadway centerline (Exhibit 7.7-5 in Appendix 7.7 Noise of Draft EIR). Future, 2020 noise levels predicted in the Draft EIR are 60 dBA L_{dn} at 1,555 feet from the Highway 101 centerline. Therefore, existing and future roadway noise at the project site would be between 60 dBA and 65 dBA L_{dn}.

As outlined in the project description, the project site is located in a residential area and would be constructed on undeveloped land. Sensitive receptors are located to the north, east, and south with the closest receptors bordering the project site.

Discussion

a) *Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Less Than Significant Impact. The long-term operational and short-term construction noise impacts of the proposed project are described below.

Short-Term (Construction) Impacts. The General Plan does not provide construction noise guidelines; however, construction of the proposed project would add short-term and intermittent noise from use of equipment and vehicles. Noise impacts from construction crew commutes and the transport of construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the site. Typical operating cycles for construction equipment used for the proposed project may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Potential construction noise impacts would be temporary and intermittent and would be less than significant.

Long-Term Operational Impacts. As included in the Affected Environment section provided above, roadway noise in the project site vicinity is approximately 65 dBA L_{dn} (Sonoma County Permit and Resource Management Department 2006). Table A

includes the noise thresholds provided in the Noise Element of the Sonoma County General Plan 2020. Park visitors would be exposed to noise generated by traffic on the surrounding streets and the future SMART rail line which would be adjacent to the project site. Future SMART operations could generate noise levels up to 55 dBA L_{dn} on the project site (SMART 2005). Existing noise conditions and future noise conditions with SMART operations would be considered an acceptable noise environment for park land uses and would not result in the exposure of persons to excessive noise levels.

Table A: Maximum Allowable Exterior Noise Exposures for Non-Transportation Noise Sources

Hourly Noise Metric, dBA	Daytime (7:00 a.m. to 10:00 p.m.)	Nighttime (7:00 a.m. to 10:00 p.m.)
L_{50} (30 minutes in any hour)	50	45
L_{25} (15 minutes in any hour)	55	50
L_8 (4 minutes 48 seconds in any hour)	60	55
L_2 (72 seconds in any hour)	65	60

Source: Sonoma County General Plan 2020, 2008

The proposed Moorland Park would operate during the daytime hours, from sunrise to sunset, with occasional evening use for special planned neighborhood events. Events held at the park would require a permit consistent with existing Sonoma County Regional Parks' regulations. Evening events are not expected to extend pass 10:00 p.m. and; therefore, the proposed park would be subject to the daytime hour standards provided in Table A.

Operation of the proposed park would include noise generated by maintenance staff and park visitors. Park maintenance would include maintaining the 1-acre turf field, the landscaping, and the park facilities. Park maintenance would occur during the daytime and would not result in a significant increase in ambient noise levels.

The proposed park would include a dog park approximately 100 feet from the nearest residence, a turf field located at minimum 50 feet from the nearest residential property line, and a skate plaza and basketball court located near Robles Avenue approximately 215 feet from the nearest sensitive receptor. The proposed art garden and playground located in the eastern portion of the site are approximately 20 feet and 50 feet from the nearest sensitive receptor. Project site plans include trees and vegetation along the park border.

According to the U.S. EPA, dogs barking at 3 feet would be approximately 73 dBA. Noise generated at the dog park would be approximately 43 dBA at the nearest residential property line. A dog barking is an intermittent noise and would not generate substantial long-term increase in the ambient noise levels. The proposed turf field could be used for limited organized soccer play for kids ten and younger. This type of organized use would be intermittent and is expected to generate noise levels below the County's thresholds for exterior noise exposure. The proposed skate plaza would generate noise levels between 64 dBA to 72 dBA L_{max} at 30 feet (Skate Park Association International). At the closest sensitive receptors potential skate plaza noise would range

from 48 dBA to 53 dBA L_{max}. Recreationists using the art garden may be talking and thus generate noise levels around 60 dBA L_{max} at 5 feet for normal conversation; however, at 100 feet from the source, this noise level would not likely exceed County noise standards.

Park visitors would generate noise intermittently that would not exceed the applicable standards. Therefore, the proposed project would not expose persons to noise levels in excess of local standards.

b) *Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?*

Less Than Significant Impact. Once constructed, operation of the proposed project would not generate excessive ground borne vibrations or ground borne noise levels. Therefore, the project would have a less-than-significant impact.

c) *A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*

Less Than Significant Impact. The long-term use of the project is for a recreational facility. As described above, the park may be used for limited organized soccer play for kids ten and younger and would include a dog park and skate plaza. The proposed park would generate intermittent noise and would not substantially increase ambient noise levels. The project is located near existing roadways, including Highway 101, which generate noise levels of approximately 65 dBA L_{dn} (Sonoma County 2008). The proposed park would not result in a substantial long-term increase above the existing ambient traffic noise.

d) *A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

Less Than Significant Impact. Construction of the proposed project would temporarily elevate noise above ambient noise levels; however, construction noise is not regulated by Sonoma County and would not be significant. Due to the existing noise environment, implementation of the proposed project would not result in a perceptible increase in ambient noise levels at the nearest off-site sensitive receptors. This impact would be less than significant.

e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. The project site is not located within an airport land use plan, or within two miles of a public airport or public use airport. The closest airport to the project site is the Sonoma Valley Airport, approximately 9 miles northwest. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The proposed project is not located within the vicinity of a private airstrip.

XIII. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial 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)?				X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X

Affected Environment

The project site consists of undeveloped land currently used by the adjacent residential neighborhood for informal recreation use. Surrounding land uses consist of a residential neighborhood and commercial/industrial development.

Discussion

a) *Induce substantial 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 would improve the project site as a neighborhood park. No new housing, commercial or industrial space would be developed as part of the proposed project. The proposed project would not result in the conversion of adjacent land uses, or provide access to previously inaccessible areas. It would not provide additional major infrastructure or increase the capacity of the existing water system. Therefore, the proposed project would not directly or indirectly induce substantial population growth.

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

No Impact. The proposed project would be located within an existing undeveloped site, which does not contain housing. Therefore, the proposed project would not displace existing housing.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. See XIII(b), above.

XIV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:	**Potentially Significant Impact**	**Potentially Significant Unless Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Fire protection?			X	
Police protection?			X	
Schools?				X
Parks?			X	
Other public facilities?				X

Affected Environment

The project site is located in unincorporated Sonoma County served by the following existing public services.

Fire Protection. Fire protection and emergency response services in Sonoma County is provided by a number of different agencies, including 15 Volunteer Fire Companies (Community Service Area 40), 17 Fire Protection Districts, and independent municipal fire departments (e.g., cities of Cloverdale, Healdsburg, Petaluma, Santa Rosa, Sebastopol, and Sonoma). Additional fire protection services in the unincorporated parts of the county are provided by the California Department of Forestry and Fire Protection (CDF) (Sonoma County Permit and Resource Management Department 2006).

Police Protection. Police protection is provided by the Sonoma County Sheriff's Office, which has over 275 Deputy Sheriffs in the Patrol Bureau, Investigations Bureau, Court Security, and Transportation Bureau (Sonoma County Sherriff's Office 2014). The Sonoma County Sherriff's Main Office is located at 2796 Ventura Avenue in Santa Rosa.

Schools. There are 40 school districts in Sonoma County governing 169 public schools, including 92 elementary schools, 20 middle/junior high schools, 15 high schools, 29 alternative schools, and 20 charter schools.

Parks. For a discussion of parks, see Section XV. Recreation.

Discussion

a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or*

other performance objectives for any of the public services: Fire protection, police protection, schools, parks, other public facilities?

Fire Protection. **Less Than Significant Impact.** Implementation of the proposed project would improve the site as a neighborhood park to serve the Moorland neighborhood. Use of the site could increase as a result of proposed improvements. However, visitors to the site are anticipated to come primarily from the local neighborhood, those people who generally reside within walking distance of the project site. Because proposed improvements would be for recreation, and would not include housing units or other structures, the incremental increase in demand for fire protection services would not be significant and would not exceed the physical and financial capabilities of the Fire Department, resulting in the need for new or expanded fire services. In addition, proposed improvements would be located within a park facility, which would be clearly marked and signed to aid in access and timely response in medical emergencies. Therefore, impacts to fire protection would be less than significant.

Police Protection. **Less Than Significant Impact.** Implementation of the proposed project would improve the site as a neighborhood park to serve the Moorland neighborhood. Use of the site could increase as a result of proposed improvements. However, visitors to the site are anticipated to come primarily from the local neighborhood, those people who generally reside within walking distance of the project site. Because proposed improvements would be for recreation, and would not include housing units or other structures, the incremental increase in demand for police protection services would not be significant and would not exceed the physical and financial capabilities of the Sherriff's Office, resulting in the need for new or expanded police protection services. Therefore, impacts to fire protection would be less than significant.

Schools. **No Impact.** Implementation of the proposed project would not result in any local or regional population increase. Therefore, the project would not require construction of new schools, or result in schools exceeding their capacities.

Parks. **Less Than Significant Impact.** Implementation of the proposed project would improve the site as a neighborhood park to serve the adjacent residential development. Therefore, the proposed project would not result in substantial adverse physical impacts associated with new parks or the need for new parks, which could cause environmental impacts.

Other Public Facilities. **No Impact.** The proposed project would improve the project site as a neighborhood park. Because it would not result in any local or regional population increase, it would not result in substantial adverse physical impacts associated with the provision of other public facilities.

XV. RECREATION

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?		X		

Affected Environment

Within Sonoma County there are two State Park Districts, the United States Army Corps of Engineers (Corps) Lake Sonoma Recreation Area, Sonoma County Regional Parks, park and recreation departments of five cities, and three special park districts that provide a variety of parklands within the County (Sonoma County Permit and Resource Management Department). The project site is an existing, undeveloped site owned by SCRP within the Moorland neighborhood.

Discussion

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

Less Than Significant Impact. Implementation of the proposed project would provide public access to the project site for use as a neighborhood park, alleviating some recreation needs in the Moorland neighborhood. Therefore, this impact is considered less than significant.

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

Potentially Significant Unless Mitigation Incorporated. The proposed project would improve the project site for use as a neighborhood park. The intent of the Master Plan process was to minimize adverse physical effects on the environment. Potential adverse effects on the environment related to the development of park facilities identified in the Master Plan have been evaluated in this Initial Study. Implementation of the mitigation measures contained in this Initial Study would reduce potential impacts to less than significant.

XVI. TRANSPORTATION/TRAFFIC

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			X	
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			X	
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?				X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
e) Result in inadequate emergency access?			X	
f) Conflict with adopted polices, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?			X	

Affected Environment

The project site is divided into two parcels of land along West Robles Avenue at the southern end of an existing residential neighborhood. West Robles Avenue and Horizon Way are adjacent to the property and are two lane arterial roadways. Intersections in the vicinity of the project site are unsignalized. Within the residential neighborhood, roadways provide on-street parking and one travel lane in each direction.

Discussion

a) *Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

Less Than Significant Impact. The proposed project is construction of a park totaling 4.22 acres of active and passive elements. The project will replace currently vacant land that may be subject to passive use by nearby residents. The project includes space for 24 parking spaces along Horizon Way, and new parallel parking along W. Robles Ave where the roadway will be widened. In total the master plan proposes a net increase of 21 spaces including two accessible spaces.

LSA examined several sources to find appropriate trip generation rates to apply for this project. The Institute of Transportation Engineers (ITE) *Trip Generation*, Ninth Edition (2012) provides rates for a city park, but the proposed project will not include a community room that could be rented by non-profit or community groups as are sometimes found in city parks. Trips to the proposed project would be expected to originate mostly from the nearby residential neighborhood. San Diego Traffic Generators (2002) differentiates between city parks (developed with meeting rooms and sports facilities) and neighborhood parks. Surveys taken of these different types of parks showed that neighborhood parks generate 5 trips per day per acre plus 6 trips per day per picnic site. However, not all of these trips are newly created trips. Some trips already exist on the roadway network and would visit the park as part of a chain of trips. For example, someone might stop by the proposed community garden in the morning and then continue to work. San Diego Traffic Generators estimates that 66 percent of park trips are primary trips and 34 percent of park trips are diverted.

Table B: Moorland Park Trip Generation

	Size	Unit	ADT	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates									
Neighborhood Park		Acre	5	0.33	0.32	0.65	0.23	0.22	0.45
		Picnic Area	6	0.39	0.39	0.78	0.27	0.27	0.54
Trip Generation									
Moorland Park	4.22	Acre	21	1.5	1.5	3	1	1	2
	13	Picnic Area	78	5	5	10	3.5	3.5	7
Total Trips			**99**	**6.5**	**6.5**	**13**	**4.5**	**4.5**	**9**
Primary Trip Percent			66%	66%	66%	66%	66%	66%	66%
Net New Trips			**65**	**4**	**4**	**8**	**3**	**3**	**6**

ADT = Average Daily Traffic

Travel by modes other than automobile, such as walking and biking, would be possible, and is highly anticipated, from the residential neighborhood which the park is planned to serve. Roadways in the vicinity of the proposed project provide sidewalks, but no separate bicycle facilities. A bus stop is located at the intersection of Moorland

Avenue/West Robles Avenue within a short walking distance of the proposed park. This has the potential to limit the additional automobile trips using the roadway network. For example, Table 2-3 in the Santa Rosa Bicycle and Pedestrian Master Plan (September 2010) reveals high percentages of bicycle and pedestrian trips for the purpose of exercise and entertainment. The recreational trips to and from the park fit these two purposes. These surveys found that 83 percent used a bicycle and 77 percent walked at least once per week to an exercise-related destination. Similarly, 77 percent used a bicycle and 73 percent walked at least once per week to an entertainment-related destination. However, if all anticipated trips occur by automobile, the volume would represent less than 1 percent of the capacity of a single lane.

A small increase in traffic would occur in the project area during the construction phase of the proposed project from construction vehicles and construction workers accessing the site. However, these impacts would be short-term, occurring only during the construction period.

For the reasons outline above, the proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. This impact would be less than significant.

b) *Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

Less Than Significant Impact. As described above, the proposed project is anticipated to generate 8 new AM peak hour trips and 6 new PM peak hour trips. This volume represents less than 1 percent of the capacity of a single lane. Use of construction vehicles and equipment during project construction would result in a minor, temporary increase in vehicle traffic in the area around the project site. However, construction activities would be temporary and are not expected to conflict with an applicable congestion management program. This impact would be less than significant.

c) *Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?*

No Impact. The proposed project is a neighborhood park serving local residents and would not result in any changes in air traffic patterns or levels of air traffic.

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

No Impact. The proposed project would not create new intersections or driveways. Parking for the proposed project would occur along Horizon Way. The existing roadways being used to serve the proposed project have not been found to be hazardous. Therefore, this impact would be less than significant.

e) *Result in inadequate emergency access?*

Less Than Significant Impact. The project does not propose to construct new roadways, intersections, or driveways. Nor does the project propose to close any existing roadways, intersections, or driveways. During construction activities, slight delays to emergency access could occur due to construction vehicles accessing the project site. However, construction activities would be short-term and temporary. The project's effects on emergency access would be limited to construction of the project and would be temporary in nature. Therefore, the proposed project would not result in inadequate emergency access.

f) *Conflict with adopted polices, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?*

Less Than Significant Impact. The proposed project may increase pedestrian and bicycle activity in the vicinity of the project. Currently, roadways near the project site provide sidewalks but do not provide separate bicycle facilities. The project does not preclude the ability to provide separate bicycle facilities in the future. Insofar as increasing volumes of bicycles and pedestrians improves visibility and safety for all bicycles and pedestrians, the proposed park and activity generated by it would likely benefit alternative transportation. The project would not conflict with adopted policies or programs supporting alternative transportation.

XVII. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
d) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	
g) Comply with federal, State, and local statutes and regulations related to solid waste?			X	

Affected Environment

A variety of local and regional purveyors provide and maintain utility and service system facilities associated with electricity, water, stormwater, wastewater, solid waste,

communications and natural gas in Sonoma County. The site currently has no existing underground utilities; however, utility lines are located in the adjacent streets.

Wastewater. South Santa receives sewer service from the South Park County Sanitation District, which contracts with the City of Santa Rosa for wastewater treatment and disposal (Sonoma County Permit and Resource Management Department, 2006). Santa Rosa's wastewater system collects, treats, and disposes of sewage generated from residential, commercial, and industrial uses. The City of Santa Rosa Utilities Department operates the Subregional Water Reclamation System, which treats wastewater from Santa Rosa, Rohnert Park, Cotati, Sebastopol, and some unincorporated areas. The current capacity of the Laguna Treatment Plant is 21.34 million gallons per day (mgd) average dry weather flow. Sanitary sewer facilities for the proposed project are available in West Robles Avenue along the project frontage.

Water. The City of Santa Rosa provides water to some unincorporated users in the South Santa Rosa area, including the project site. The City currently receives all of its potable water supply from the Sonoma County Water Agency (SCWA). In November 2004, Santa Rosa approved a plan to use some of its own groundwater supply to meet future demands. In addition, some residences in the City derive their water supply from private groundwater wells. Public water facilities in the project area are available in West Robles Avenue along the project frontage.

Storm Drain Facilities. Storm drain facilities are located along the site boundaries in Moorland Avenue and West Robles Avenue and along Horizon Way.

Solid Waste. Solid waste transfer and disposal facilities are owned by the County and serve the cities and unincorporated portions of the county. These include four transfer stations (Healdsburg, Annapolis, Guerneville, and Sonoma), the Central Disposal Site, and the Sonoma Compost Facility, which is located at the Central Disposal Site (Sonoma County Permit and Resource Management Department, 2006). The Central Landfill is the only operating landfill within Sonoma County. The landfill is owned by the County, and is permitted to accept up to 2,500 tons per day of non-hazardous municipal solid waste. Seventy-five percent of the waste disposed at the landfill is generated by the nine incorporated cities in the county. In 2003, the average daily tonnage was 1,433 tons per day (Sonoma County Permit and Resource Management Department, 2006).

Discussion

a) *Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*

Less Than Significant Impact. Implementation of the proposed project would result in the construction of new park improvements, including a restroom near the playground and two drinking fountains (one on each parcel). These facilities would be located adjacent to existing roadways and could be connected to existing public service system, including local sewer. It is expected that the relatively small amount of wastewater generated from park improvements (e.g., one restroom) can be accommodated by local

sanitary treatment systems and would not exceed the wastewater treatment requirement of the Regional Water Quality Control Board.

b) *Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

Less Than Significant Impact. As described above, implementation of the proposed project would result in the construction of park improvements, including a restroom and two drinking fountains, as well as landscape and turf areas that would require irrigation. Facilities would be located adjacent to existing roadways and could be connected to existing public service systems, including water and sewer. These connections would not be considered "major" lines because these improvements would be made as additions to the existing infrastructure.
Water demand would be increased over the existing level of demand due to proposed improvements. However, the proposed project has been designed to conserve water. Conservation elements would be provided in the proposed Master Plan including: climate-responsive irrigation controllers and water-conserving delivery systems to minimize water use; on-site treatment for stormwater runoff and infiltration (i.e., permeable paving materials, infiltration area); use of drought tolerant and native plants with low maintenance requirements; and installation of low-flow plumbing fixtures. Given that the project would include measures to conserve water, the increased demand for water resulting from implementation of the proposed project is not expected to be significant and would not affect local or regional water distribution facilities. SCRP staff would work with the City of Santa Rosa to ensure adequate water service to the park site.

As indicated above, the proposed project would not generate substantial amounts of wastewater or significantly increase water demand. Therefore, implementation of the proposed park master plan would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities. This impact would be less than significant.

c) *Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

Less Than Significant Impact. Implementation of the proposed project would result in an increase in impervious surfaces and an associated increase in stormwater runoff. As described in Response IX(a), the proposed park master plan includes green and sustainable design features that would retain potential runoff on-site. The project would include an infiltration area to retain and infiltrate stormwater runoff. The area would normally be dry and would be planted with native plants adapted to seasonal wetland conditions and designed as a natural and educational amenity.

As described in Response IX.a., the proposed project would be required to comply with the Phase I MS4 Permit that requires implementation of measures for site design, source control, runoff reduction, stormwater treatment, and baseline hydromodification

management. Hydromodification is the alteration of the natural flow of water through a landscape, and often takes the form of creek channel erosion. Hydromodification is one of the leading sources of impairment in streams, lakes, and estuaries. The Phase I MS4 Permit also requires implementation of LID Standards.

Per the Phase I MS4 Permit, regulated projects (which includes implementation of the Master Plan) to include facilities designed to evapotranspire, infiltrate, harvest/use and biotreat stormwater to meet at least one of the hydraulic sizing criteria included in the Phase I MS4 Permit. As part of the project, the County would prepare a Storm Water Mitigation Plan (SWMP) (to identify permanent stormwater controls) and a Storm Water Pollution Prevention Plan (SWPPP) (to identify temporary construction of stormwater controls) in compliance with existing stormwater protection requirements.
Since LID measures would be required under existing NPDES regulations and these measures encourage reuse, infiltration, and bioretention so that site hydrology is not substantially altered, this potential impact is less than significant.

d) *Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

Less Than Significant Impact. See XVII(b), above.

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

Less Than Significant Impact. See XVII(a), above.

f) *Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

Less Than Significant Impact. Operation of the proposed project is not anticipated to generate significant amount of solid waste. Users of the park would dispose of garbage, but not in amounts that would greatly exceed average per capita garbage generation rates. In addition recycling receptacles would be located throughout the park, allowing the proposed Master Plan to be in full compliance with waste diversion goals mandated by the California Integrated Waste Management Act. The amount of solid waste generated by both users of the park and construction of park facilities or infrastructure would not substantially decrease the amount of space in the Central Landfill, which serves the project site. Solid waste disposal off-site would comply with all local, State, and federal requirements. Therefore, impacts related to solid waste disposal are considered less than significant.

g) *Comply with federal, State, and local statutes and regulations related to solid waste?*

Less Than Significant Impact. The proposed project would promote composting and recycling on-site. Receptacles for recyclable waste would be provided as part of proposed improvements and the County would contract with appropriate entities for the removal and processing of recyclable waste. SCRP currently complies with federal,

State, and local statutes related to solid waste recycling. These programs would continue with implementation of the proposed project and potential impacts are considered less than significant.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?		X		
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.)			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

a) Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Unless Mitigation Incorporated. As described in this Initial Study, implementation of the proposed project would have the potential to adversely impact special-status plant and animal species, wetlands, and previously undiscovered cultural and paleontological resources and/or human remains. Implementation of the mitigation measures recommended in this Initial Study would ensure that construction and operation of the proposed project would not: 1) degrade the quality of the environment; 2) substantially reduce the habitat of a fish or wildlife species; 3) cause a fish or wildlife population to drop below self-sustaining levels; 4) threaten to eliminate a plant or animal community; 5) reduce the number or restrict the range of a rare or

endangered plant or animal; or 6) eliminate important examples of the major periods of California history or prehistory.

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

Less Than Significant Impact. The impacts of the proposed project would be individually limited and not cumulatively considerable. The proposed project would construction of a new neighborhood park to serve the Moorland neighborhood. As described in this Initial Study, impacts associated with the proposed project would be temporary, construction-related and would be reduced to a less than significant level with implementation of the mitigation measures contained herein. No other projects would be under construction at the same time as the proposed project. Therefore, the proposed project would not make a considerable contribution toward a cumulative impact related to construction. Additionally, the proposed project would not generate a significant amount of greenhouse gas emissions and would therefore not result in a cumulatively considerable impact to global climate change.

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

Potentially Significant Unless Mitigation Incorporated. As described in this Initial Study, any potential environmental impacts from the proposed project would be reduced to a less than significant level with the implementation of the recommended mitigation measures. With implementation of measures both incorporated into the project design and recommended as mitigations to reduce the impacts associated with air quality, biological resources, cultural resources, and hazardous materials, the proposed project would not result in substantial adverse effects on human beings.

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APPENDIX A
SUMMARY ACTION OF ENVIRONMENTAL REVIEW COMMITTEE

On January 6, 2015, the Draft IS/MND was presented to the Sonoma County Environmental Review Committee (ERC) for their review and comment. The ERC comments were addressed in the Draft IS/MND prior to its release for public review. Their comments are attached here for reference.

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Summary Action of the
Environmental Review Committee

January 5, 2016

Item No. 1:

Time:	**9:00 am**	**File:**	PPR14-09-01
Applicant:	Regional Parks	Staff:	Scott Wilknson
Env. Doc.:	To Be Determined		
Proposal:	Review of Draft Park Master Plan for a neighborhood park project.		
Location:	3339 Moorland Avenue and 405 Horizon Way, Santa Rosa		
APN:	043-280-027 and -028		
Sup. Dist:	5		
Zoning:	R1 (Low Density Residential), B7 (Frozen Lot Size) and VOH (Valley Oak Habitat)		

Action: The Environmental Review Committee reviewed the subject application and makes the following determination:

_____ An Expanded Initial Study is required.
_____ An Environmental Impact Report is required.
_____ An Environmental Reconnaissance is required.
_____ A supplement/Addendum to existing EIR is required.
✓ A Mitigated Negative Declaration is recommended.

Notes:
THE APPLICANT WAS DIRECTED TO CLARIFY THE PROJECT DESCRIPTION DOES NOT INCLUDE EVENTS FEATURING AMPLIFIED SOUND.

THE APPLICANT'S CONSULTANT WILL CONFER WITH CITY PARKS STAFF TO BETTER DETERMINE PEAK HOUR TRIP GENERATION. AS STATED IN TABLE B, PAGE 70, A FOCUSED TIS IS REQUIRED.

Becky VerMeer: Aye Cecliy Condon: Aye Gail Davis: Aye

Alex Rosas: Aye Mitch Simson: Aye

Ayes: 5 Noes: 0 Absent: 0 Abstain: 0

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APPENDIX B
MITIGATION MONITORING AND REPORTING PROGRAM

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MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation and Monitoring Reporting Program (MMRP) has been formulated based upon the findings of the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the proposed Moorland Neighborhood Park Master Plan (proposed project). The purpose of the MMRP is to ensure the implementation of mitigation measures identified as part of the environmental review for the project. The MMRP includes the following information:

- A list of mitigation measures;
- The party responsible for implementing the mitigation measure;
- The timing for implementation of the mitigation measure;
- The agency/city department responsible for monitoring the implementation; and
- The monitoring action and frequency.

If the IS/MND is adopted, and if the County approves the project, including the mitigation measures as conditions of approval, then Sonoma County Regional Parks (SCRP) must adopt this MMRP, or an equally effective program.

Table 1: Mitigation Monitoring and Reporting Program

Mitigation Measures	Implementation Actions	Monitoring/ Reporting Responsibility	Timing Requirements	Verification By/Date
I. AESTHETICS				
There are no significant impacts related to aesthetics.				
II. AGRICULTURAL RESOURCES				
There are no significant impacts related to agricultural resources.				
III. AIR QUALITY				
Mitigation Measure AIR-1: Consistent with guidance from the BAAQMD, the following controls shall be implemented at the construction site to control construction emissions: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered to control dust and other particulate pollutants as needed to control construction emissions. • 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 shall be prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph. • 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 5 minutes (as required by the California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points regarding maximum idling time. • 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.	• Include measure as Condition of Approval. • Implementation actions are outlined in the mitigation measure.	• SCRP is responsible for incorporating measure into contract specifications and for ensuring compliance during construction. • The Project Contractor is responsible for implementing this measure.	During construction activities.	

Mitigation Measures	Implementation Actions	Monitoring/ Reporting Responsibility	Timing Requirements	Verification By/Date
• The contractor shall post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Sonoma County Permit and Resources phone number shall also be visible to ensure compliance with applicable regulations.				
IV. BIOLOGICAL RESOURCES				
Mitigation Measure BIO-1: Prior to the initiation of ground-disturbing activities on the project site, the County shall implement mitigation measures that are acceptable to the Corps, USFWS and CDFW to compensate for the loss of 4.2 acres of California tiger salamander habitat on the project site. Mitigation shall be consistent with the PBO and shall include purchase of credits for California tiger salamander habitat and suitable listed plant habitat at a USFWS- and CDFW- approved mitigation or conservation bank whose service area includes the project site.	Include measure as Condition of Approval.	SCRP is responsible for purchasing credits at an approved mitigation or conservation bank whose service area includes the project site.	Prior to construction activities.	
Mitigation Measure BIO-2: Prior to the initiation of construction, the County shall have a second year of surveys conducted by a qualified botanist using the protocol established for the Santa Rosa Plain. Depending on the findings of the surveys, the County shall mitigate for impacts to suitable habitat according to the terms of the PBO as follows: • If the second year of surveys show that the seasonal wetlands onsite do not support listed plants, the County shall purchase credits for listed vernal pool plants at a mitigation bank that includes the project site within its service area (such as the Carinalli-Todd Mitigation Bank). Credits shall be purchased for the loss of suitable rare plant habitat at a ratio of 1.5:1 (preserved: impacted) for all suitable seasonal wetland habitat impacted by the project. The proposed project is expected to result in the fill of 0.45 acres of suitable habitat for listed plants. Credits equivalent to 1.5 times the impacted acreage (0.68 acre) shall be purchased prior to the initiation of ground disturbing activities. • If listed plants are observed onsite, mitigation requirements as described in the PBO for the species	• Include measure as Condition of Approval. • Implementation actions are outlined in the mitigation measure.	• SCRP is responsible for including measure as a Condition of Approval, hiring a qualified botanist, and purchasing credits at an approved mitigation bank. • A qualified botanist is responsible for conducting surveys.	Prior to construction activities.	

Mitigation Measures	Implementation Actions	Monitoring/ Reporting Responsibility	Timing Requirements	Verification By/Date
observed onsite shall be met prior to the initiation of ground disturbing activities on the site. This mitigation shall require purchase of credits at a mitigation bank that includes the project site in its service area at a ratio of 2:1 (for Sebastopol meadowfoam) or 3:1 (for Burke's goldfields or Sonoma sunshine) (preserved: impacted, depending on species) for all suitable seasonal wetland impacted directly or indirectly by the project. Assuming an impact area of 0.45 acres, credits equivalent to 0.9 (2:1) to 1.35 (3:1) acres shall be purchased. The credits shall be purchased prior to the initiation of ground disturbing activities.				
Mitigation Measure BIO-3: Prior to the initiation of construction on the project site, a qualified biologist (project biologist) shall conduct pre-construction education training for all construction personnel. The purpose of the education/training will be to: (1) provide information regarding California tiger salamander and other sensitive biological resources on and in the vicinity of the project site, (2) outline project-specific avoidance and minimization measures required to avoid impacts to California tiger salamander and other biological resources; and (3) reinforce the importance of confining equipment and personnel to identified work areas. Training sessions will be required for any new construction personnel before being allowed to access the site.	• Include measure as Condition of Approval. • Implementation actions are outlined in the mitigation measure. • Incorporate measure as part of construction specifications.	• SCRP is responsible for incorporating measure into contract specifications, and for ensuring compliance prior to construction. • A qualified professional biologist is responsible for conducting the pre-construction education training. • The Project Contractor is responsible for ensuring work is stopped if species are observed within the project site.	Prior to construction activities.	
Mitigation Measure BIO-4: The County shall ensure that the project contractor implement the following avoidance measures for listed species: • Equipment and personnel will stay within a specified work area and avoid impacts outside of the Development	• Include measure as Condition of Approval. • Implementation actions are outlined	• SCRP is responsible for incorporating measure into contract specifications, and for ensuring	During construction activities.	

Mitigation Measures	Implementation Actions	Monitoring/ Reporting Responsibility	Timing Requirements	Verification By/Date
Area. • All refueling, maintenance, and staging of equipment and vehicles will occur in areas away from receiving waters. • Measures to maintain water quality and prevent sedimentation will be implemented and are described in the SWPPP. • Trash will be properly contained and disposed of on-site. • No pets or firearms will be allowed at the work area.	in the mitigation measure.	compliance during construction. • The Project Contractor is responsible for implementing this measure.		
Mitigation Measure BIO-5: Prior to construction, the County shall obtain authorization to fill the jurisdictional area under the Corps' Section 404 Nationwide Permit Program and shall provide mitigation at a ratio of 1:1 for direct impacts to jurisdictional areas. Consistent with Corps policy, the impacts to jurisdictional areas shall be mitigated by purchasing wetland mitigation credits from a mitigation bank in Sonoma County, California.	Include measure as Condition of Approval.	• SCRP is responsible for obtaining authorization, and purchasing wetland mitigation credits from an approved mitigation bank.	Prior to construction activities.	
Mitigation Measure BIO-6: The following measures to control erosion and sedimentation from the proposed project shall be implemented: • If determined to be necessary, sediment control measures may include inlet protection, straw bale barriers, straw mulching, straw wattles, and other recommendations from the County of Sonoma. • Disturbance within the project area will be kept to a minimum. • Immediately after vegetation has been removed, one or more barriers of silt fencing may be installed, if determined to be necessary, at the downslope end of the work area to prevent sediments and debris from washing into the storm drains that lead to downstream water sources. This fencing would be maintained throughout construction, and sediment that settles against it would be removed, as necessary, in order to ensure the continued functioning of the silt fencing as a water filtration measure. If large rainfall events or heavy stream flow are anticipated during the construction period, the	• Include measure as Condition of Approval. • Incorporate measure as part of construction specifications.	• SCRP is responsible for incorporating measure into contract specifications and for ensuring compliance during construction. • The Project Contractor is responsible for implementing this measure.	During construction activities.	

Mitigation Measures	Implementation Actions	Monitoring/ Reporting Responsibility	Timing Requirements	Verification By/Date
fencing may be temporarily removed. • The soil and rock fill will be compacted to prevent erosion and washouts. • Periodic inspections will be provided during construction to ensure that all measures are in place.				
Mitigation Measure BIO-7: If construction is proposed to occur during the nesting season (February 1 through August 31), a qualified biologist shall conduct nesting bird surveys prior to tree pruning, tree removal, ground disturbing activities, or construction activities to locate active nests on or immediately adjacent to the project site. • Preconstruction surveys shall be conducted no more than 14 days prior to initiation of construction activities or tree trimming/removal. If the project is delayed, additional preconstruction surveys at 14-day intervals shall be completed until project construction is initiated on the site. • Locations of active nests shall be described and protective measures implemented. Protective measures shall include establishment of clearly delineated (i.e., orange construction fencing) exclusion zones around each nest sites. The exclusion zone shall have a radius of 50 to 250 feet centered on the nest tree. The size of the exclusion zone shall be determined by a qualified biologist and shall take into consideration the bird species and the level of disturbance anticipated near the nest. Typically, exclusion zones for passerines are 50 feet, while those for raptors may be up to 250 feet. • Active nest sites shall be monitored periodically throughout the nesting season to identify any sign of disturbance. These protection measures shall remain in effect until the young have left the nest and are foraging independently or the nest is no longer active. • Exclusion zones may be reduced in size, if in the opinion of the project biologist and in consultation with the California Department of Fish and Wildlife, a smaller exclusion zone is determined to adequately protect the	• Include measure as Condition of Approval. • Incorporate measure as part of construction specifications.	• SCRP is responsible for incorporating measure into contract specifications, for ensuring compliance during construction, for hiring a qualified biologist, and ensuring compliance during construction. • A qualified biologist is responsible for conducting surveys, establishing exclusion zones, periodic monitoring during construction, and preparing report at the end of construction. • The Project Contractor is responsible for ensuring no work occurs in the exclusion zones.	Prior to, during and following construction activities.	

Mitigation Measures	Implementation Actions	Monitoring/ Reporting Responsibility	Timing Requirements	Verification By/Date
active nest. Additional monitoring (i.e., daily) may be required to monitor the behavior of the nesting birds if the exclusion zones are reduced in size. The project biologist shall be responsible for determining if the smaller exclusion zones are effective. • A report shall be prepared at the end of the construction season detailing the results of the preconstruction surveys and monitoring. The report shall be submitted to the County by November 30 of each year.				
Mitigation Measure BIO-8: The County shall comply with all provisions of the Sonoma County Tree Protection Ordinance, including: protection of trees to remain, replacement of trees to be removed, and protection of "protected" trees during project construction. All trees proposed for removal shall be replaced pursuant to Section 26-88-010 (m) of the Sonoma County Code.	• Include measure as Condition of Approval. • Incorporate measure as part of construction specifications.	• SCRP is responsible for incorporating measure into contract specifications, ensuring compliance during construction, and replacing trees following construction. • The Project Contractor is responsible for implementing tree protection measures during construction.	Prior to and following construction activities.	
V. CULTURAL RESOURCES				
Mitigation Measure CULT-1: If prehistoric or historic-period archaeological deposits are identified during construction, project-related impacts to such resources shall be avoided, if feasible. An attempt at impact avoidance shall be undertaken in consultation a professional archaeologist. If avoidance is not feasible, the deposits shall be evaluated to determine if they qualify as historical resources under California Public Resources Code §21084.1 and §21083.2. If the evaluation determines that the deposit is neither a historical nor unique archaeological resource, the avoidance of potential impacts to the deposit is not necessary. If the deposit does qualify under either resource category, impacts	• Include measure as Condition of Approval. • Implementation actions are outlined in the mitigation measure.	• SCRP is responsible for incorporating measure into contract specifications, for ensuring compliance during construction, and hiring a professional archaeologist (if discoveries are made).	During construction activities.	

Mitigation Measures	Implementation Actions	Monitoring/ Reporting Responsibility	Timing Requirements	Verification By/Date
to the resource shall be mitigated. Mitigation may consist of excavating the archaeological deposit in accordance with a data recovery plan (see *CEQA Guidelines* §15126.4(b)(3)(C)) developed in consultation with descendant community representatives (as warranted); recording the resource; preparing a report of findings; and accessioning recovered archaeological materials at an appropriate curation facility. Public educational outreach may also be appropriate. Upon completion of the evaluation and, if necessary, mitigation, the archaeologist shall prepare a draft report to document the methods and results of the investigation(s). The draft report shall be submitted to the SCRP, the descendant community involved in the investigation(s), and the Northwest Information Center.		• A professional archaeologist is responsible for evaluating any resources found inadvertently during construction; and identifying appropriate mitigation measures. • The Project Contractor is responsible for coordinating and cooperating with the archaeologist and any stop-work orders if resources are discovered.		
Mitigation Measure CULT-2: Should paleontological resources be encountered during project subsurface construction activities, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with SCRP representatives, and make recommendations for the treatment of the discovery. If the find is determined to be significant, and project activities cannot avoid impacting the resource, the impact to the resource shall be mitigated in accordance with the recommendations of the consulting paleontologist. Mitigation may include monitoring, recording the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Public educational outreach may also be appropriate. Upon completion of the assessment, a report documenting methods, findings, and recommendations of the investigation shall be prepared and submitted to the SCRP, and, if paleontological materials are recovered, a paleontological repository, such as the University of California Museum of Paleontology.	• Include measure as Condition of Approval. • Implementation actions are outlined in the mitigation measure.	• SCRP is responsible for incorporating measure into contract specifications, hiring a qualified paleontologist (if discoveries are made), and for ensuring compliance during construction. • A qualified paleontologist is responsible for evaluating any resources found inadvertently during construction; and identifying appropriate	During construction activities.	

Mitigation Measures	Implementation Actions	Monitoring/ Reporting Responsibility	Timing Requirements	Verification By/Date
		mitigation measures. • The Project Contractor is responsible for coordinating and cooperating with the paleontologist and any stop-work orders if resources are discovered.		
Mitigation Measure CULT-3: If human remains are encountered during project construction, work within 25 feet of the discovery shall be redirected and the Sonoma County Coroner notified immediately. At the same time, the archaeologist who served as monitor or consulting archaeologist shall be contacted to assess the situation, in consultation with the descendant community also involved with the pre-construction testing, as well as the Coroner's representative. Project personnel shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the Coroner shall notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Most Likely Descendant (MLD), which will likely be the representative of the descendant community already involved, to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods. Upon completion of the assessment, the archaeologist shall prepare a report documenting the investigation's methods and results, and provide recommendations for the treatment of the human remains and any associated cultural materials, as appropriate and in coordination with the recommendations of the MLD. The draft report shall be submitted to the SCRP, the descendant community involved in the treatment of the resources, and the Northwest Information Center.	• Include measure as Condition of Approval. • Implementation actions are outlined in the mitigation measure.	• SCRP is responsible for incorporating measure into contract specifications, hiring a professional archaeologist (if discoveries are made), and for ensuring compliance during construction. • A professional archaeologist is responsible for assessing the situation, and for preparing the report. • The Project Contractor is responsible for coordinating and cooperating with the County Coroner and professional archaeologist and for any stop-work orders if human remains are discovered.	During construction activities.	

Mitigation Measures	Implementation Actions	Monitoring/ Reporting Responsibility	Timing Requirements	Verification By/Date
VI. GEOLOGY AND SOILS				
Mitigation Measure GEO-1: Prior to grading, excavation, and construction of any improvements under the Master Plan, a design-level geotechnical report shall be prepared by a licensed professional and submitted to Sonoma County Parks staff for review and approval. The geotechnical review shall specifically address potential adverse geological conditions at the site, including but not limited to expansive soils and seismic shaking and verify that the project plans incorporate the current California Building Code requirements, and other applicable design standards. All design measures, recommendations, design criteria, and specifications set forth in the design-level geotechnical review shall be implemented as a condition of project approval.	• Include measure as Condition of Approval. • Implementation actions are outlined in the mitigation measure.	SCRP is responsible for incorporating measure into contract specifications, for hiring a license professional to prepare the geotechnical report, and for ensuring design measures, recommendations, design criteria and specifications are incorporated into project plans.	Prior to construction activities.	
VII. GREENHOUSE GAS EMISSIONS				
There are no significant impacts related to greenhouse gas emissions.				
VIII. HAZARDS				
Mitigation Measure HAZ-1: Project construction plans shall include emergency procedures for responding to hazardous materials releases including the necessary personal protective equipment, spill containment procedures, and training of workers to respond to accidental spills/releases. All use, storage, transport and disposal of hazardous materials (including any hazardous wastes) during construction activities shall be performed in accordance with existing local, state, and federal hazardous materials regulations.	• Include measure as Condition of Approval. • Implementation actions are outlined in the mitigation measure. • Incorporate measure as part of construction specifications.	• SCRP is responsible for incorporating measure into contract specifications and for ensuring compliance during construction. • The Project Contractor is responsible for implementing this measure.	Prior to and during construction activities.	
Mitigation Measure HAZ-2: Prior to construction, a shallow soil sampling plan shall be prepared and implemented to evaluate the potential for impacts from pesticides, herbicides, heavy metals, and wood preservatives. The soil sampling plan shall be conducted by a California Professional Geologist and/or a California Professional Civil Engineer with experience in contaminated site investigation. The sampling plan shall be submitted to the County for review and approval before construction.	• Include measure as Condition of Approval. • Implementation actions are outlined in the mitigation measure.	• SCRP is responsible for including measure as Condition of Approval, hiring a California Professional Geologist and/or a California	Prior to construction activities.	

Mitigation Measures	Implementation Actions	Monitoring/ Reporting Responsibility	Timing Requirements	Verification By/Date
Sampling for agricultural chemicals shall be conducted in accordance with Department of Toxic Substance Control's (DTSC) Interim Guidance for Sampling Agricultural Properties (Third Revision, dated 30 April 2008). A further investigation of the former farm house area on Parcel A shall also be conducted to determine if there are subsurface elements such as a septic system, underground fuel storage tank (UST) or a well, so that if present, these can be addressed prior to development. In the event that the soil sampling indicates the presence of contaminants above relevant health screening levels, all recommendations contained in the Phase II Environmental Site Assessment (e.g., soil removal or remediation) shall be implemented by the County.		Professional Civil Engineer to conduct soil sampling, and for implementing the recommendations contained in the Phase II Environmental Site Assessment. • A California Professional Geologist and/or a California Professional Civil Engineer is responsible for conducting sampling and for preparing the Phase II Environmental Site Assessment.		
IX. HYDROLOGY AND WATER QUALITY				
There are no significant impacts related to hydrology and water quality.				
X. LAND USE AND PLANNING				
There are no significant impacts related to land use and planning.				
XI. MINERAL RESOURCES				
There are no significant impacts related to mineral resources.				
XII. NOISE				
XIII. POPULATION AND HOUSING				
There are no significant impacts related to population and housing.				
XIV. PUBLIC SERVICES				
There are no significant impacts related to public services.				
XV. RECREATION				
There are no significant impacts related to recreation.				
XVI. TRANSPORATION/TRAFFIC				
There are no significant impacts related to transportation/traffic.				
XVII. UTILITIES AND SERVICE SYSTEMS				
There are no significant impacts related to utilities and service systems.				

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APPENDIX C
RESPONSE TO COMMENTS

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RESPONSES TO COMMENTS

In accordance with CEQA Guidelines Section 15073, the Initial Study/Draft Mitigated Negative Declaration was circulated for public review for 30 days beginning on February 1, 2016 and ending on March 1, 2016. Two comment letters were received by Sonoma County Regional Parks (SCRP) during this comment and review period. Persons or agencies that provided written comments included the following:

- Mr. Scott Morgan, State Clearinghouse; and
- Mr. Ken Chian, P.E., California Public Utilities Commission.

Copies of these comment letters are provided in this appendix and responses to the substantive issues raised by the commenters are provided on the page following the letters. When cross-referenced in the text, the comment is referred to as Letter-# where the letter refers to the commenter, and the number following the hyphen refers to the comment number within that letter. For example, comment B-1 refers to the first comment within the letter submitted by the California Public Utilities Commission.

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

March 2, 2016

Scott Wilkinson
Sonoma County
2300 County Center Drive, Suite 120A
Santa Rosa, CA 95403

Subject: Moorland Neighborhood Park Master Plan
SCH#: 2016022004

Dear Scott Wilkinson:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 1, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2016022004
Project Title Moorland Neighborhood Park Master Plan
Lead Agency Sonoma County

Type **MND** Mitigated Negative Declaration

Description Sonoma County Regional Parks proposes to develop a new neighborhood park in the underserved Moorland neighborhood in unincorporated Sonoma County. Proposed improvements include: a small turf field for informal play and potentially limited organized soccer play, a place for neighborhood events, a play area for kids, picnic areas, an off-leash dog area, a community garden, a memorial for Andy Lopez, a small parking area, perimeter sidewalks, interior paths, a skate plaza, basketball court, restroom, shade structure to serve as an outdoor clubhouse, and a natural area to accommodate storm water runoff and provide habitat and educational values.

Lead Agency Contact

Name Scott Wilkinson
Agency Sonoma County
Phone 707-565-2734 **Fax**
email
Address 2300 County Center Drive, Suite 120A
City Santa Rosa **State** CA **Zip** 95403

Project Location

County Sonoma
City Santa Rosa
Region
Lat / Long 38° 23' 41.02" N / 122° 43' 11.96" W
Cross Streets Moorland Ave., West Robles Ave., Horizon Way
Parcel No. 043-280-027, 043-280-028
Township 6N **Range** 8W **Section** 2 **Base** Sonoma

Proximity to:

Highways 101
Airports
Railways NW Pacific/SMART
Waterways
Schools
Land Use UR 5 (Urban Residential)/R1 B7 VOH and R1 B7 RC 100/25/VOH

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Other Issues; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Landuse; Cumulative Effects

---

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 3; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Air Resources Board; Regional Water Quality Control Board, Region 1; Native American Heritage Commission; Public Utilities Commission

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Date Received 02/01/2016 **Start of Review** 02/01/2016 **End of Review** 03/01/2016

Note: Blanks in data fields result from insufficient information provided by lead agency.

STATE OF CALIFORNIA

EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013

Clear 3/1/16 E

Governor's Office of Planning & Research
FEB 25 2016
STATE CLEARINGHOUSE

February 25, 2016

Mr. Scott Wilkinson
County of Sonoma
2300 County Center Drive, Suite 120A
Santa Rosa, California 95403

Dear Mr. Wilkinson:

SUBJECT: SCH 2016022004 Sonoma County Moorland Neighborhood Park Master Plan - DMND

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission Rail Crossings and Engineering Branch (RCEB) is in receipt of the draft *Mitigated Negative Declaration (DMND)* for the proposed County of Sonoma (County) Moorland Neighborhood Park Master Plan project.

The project area includes active railroad tracks. RCEB recommends that the County add language to the Master Plan so that any future development adjacent to or near the railroad/light rail right-of-way (ROW) is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade crossings. This includes considering pedestrian circulation patterns or destinations with respect to railroad ROW and compliance with the Americans with Disabilities Act. Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade crossings due to increase in traffic volumes, and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad ROW.

If you have any questions in this matter, please contact me at (213) 576-7076, ykc@cpuc.ca.gov.

Sincerely,

Ken Chiang

Ken Chiang, P.E.
Utilities Engineer
Rail Crossings and Engineering Branch
Safety and Enforcement Division

C: State Clearinghouse

Responses to Letter A
State Clearinghouse
Scott Morgan, Director

A-1: This comment acknowledges the State Clearinghouse's receipt of the Mitigated Negative Declaration for the proposed project. The comment does not address the adequacy of the CEQA document or suggest changes to the document itself. No further response is necessary.

STATE OF CALIFORNIA EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013

February 25, 2016

Mr. Scott Wilkinson
County of Sonoma
2300 County Center Drive, Suite 120A
Santa Rosa, California 95403

Dear Mr. Wilkinson:

SUBJECT: SCH 2016022004 Sonoma County Moorland Neighborhood Park Master Plan - DMND

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission Rail Crossings and Engineering Branch (RCEB) is in receipt of the draft *Mitigated Negative Declaration (DMND)* for the proposed County of Sonoma (County) Moorland Neighborhood Park Master Plan project.

The project area includes active railroad tracks. RCEB recommends that the County add language to the Master Plan so that any future development adjacent to or near the railroad/light rail right-of-way (ROW) is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade crossings. This includes considering pedestrian circulation patterns or destinations with respect to railroad ROW and compliance with the Americans with Disabilities Act. Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade crossings due to increase in traffic volumes, and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad ROW.

If you have any questions in this matter, please contact me at (213) 576-7076, ykc@cpuc.ca.gov.

Sincerely,

Ken Chiang, P.E.
Utilities Engineer
Rail Crossings and Engineering Branch
Safety and Enforcement Division

C: State Clearinghouse

Responses to Letter B
California Public Utilities Commission
Ken Chiang, P.E., Utilities Engineer, Rail Crossings and Engineering Branch, Safety and Enforcement Division

B-1: The comment states that due to the presence of active railroad tracks near the project site, language should be added to the Master Plan so that any future development adjacent to or near the railroad/light rail right-of-way (ROW) is planned with safety of the rail corridor in mind. The Master Plan has considered safety in proximity to the rail corridor. Proposed pathways within the park site would be American with Disabilities Act (ADA) compliant and trees would be planted along the western boundary of the site adjacent to the railroad ROW. The proposed park would be separated from the railroad tracks by fencing and a multi-use path that would be constructed as part of the Sonoma-Marin Area Rail Transit (SMART) Train project. The fence and trail would not be constructed by SCRP as part of the proposed park project. Construction of these SMART facilities would limit the access of park users onto the railroad ROW.

As described in Section XVI. Transportation/Traffic of the IS/MND, the proposed park would not generate a significant number of new vehicle trips in the project area, thereby requiring improvements to the existing at-grade railroad crossing or construction of a grade-separated crossing. The proposed park is intended to serve the Moorland neighborhood, located north and east of the railroad corridor. Most park users are expected to walk and/or bike to the proposed park and would not need to cross the railroad ROW to access the site.

No changes to the IS/MND are required.