Mitigated Negative Declaration

Sonoma County Permit and Resource Management Department
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Publication Date: February 3, 2016
Adoption Date: March 17, 2016
State Clearinghouse: 2016022040

Pursuant to Section 15071 of the State CEQA Guidelines, this summary of findings and the attached Initial Study and mitigations constitute the Mitigated Negative Declaration as proposed for or adopted by the County of Sonoma for the project described below:

Project Title: The Wildlands Conservancy Parking Lot and Trail

File Number: PLP15-0049 **APN:** 099-030-003

Project Location Address: 12001 Highway 1, Jenner, CA

Lead Agency: Sonoma County PMRD

Decision Making Body: Board of Zoning Adjustments

Project Applicant: Brook Edwards / The Wildlands Conservancy

Property Owner: Brook Edwards / The Wildlands Conservancy

Land Use Designation: LEA 160; LEA 160/640

Zoning: LEA (Land Extensive Agriculture), CC (Coastal Combining), B6-160/640 acre density, SR (Scenic Resource) and LEA (Land Extensive Agriculture), B6-160 acre density, SR (Scenic Resource)

Project Deemed Complete: June 12, 2015

<u>Project Description:</u>

Introduction

The project proposes to construct a public access to the Jenner Highlands Preserve, with creation of a 30-space trailhead parking lot and approximately 400-foot long ADA-accessible trail leading to a scenic overlook of Highway 1 and the Pacific Ocean. Access to the parking lot would be taken from an existing driveway connection to Highway 1, also known as Sharkfin Rock. The parking lot

and trail would be open from dawn to dusk every day. The project would include construction of an approximately 20 ft x 20 ft bathroom, to be placed alongside the trail. The project also proposes ancillary site improvements, including enhancement and creation of wetlands related to replacement of a portion of wetlands that would be impacted as part of site development, and restored storm water drainage system improvements on the site. The total area of site development would be approximately 5.9 acres. The project does not propose access to or use of lands west of Highway 1.

Site Characteristics and Setting

The project site is located approximately two miles north of Jenner, along the east (inland) side of Highway 1. The project property consists of an approximately 473-acre parcel, which is part of the larger 5,630-acre Jenner Headlands Preserve. The Preserve was acquired in 2009 as part of a public-private partnership that included The Wildlands Conservancy (applicant for the current proposal) and the Sonoma Land Trust. The Preserve is intended to protect the lands from future development while preserving its scenic, biotic and cultural resources. The Sonoma County Agricultural Preservation and Open Space District has a conservation open space easement on the land. The proposed project site was selected after a study by the applicant and Sonoma Land Trust, which included Sonoma County Regional Parks, evaluated public access points to the Preserve lands. The evaluation included assessment of resource protection, safety, permitting and costs. The applicant also indicates the project site was selected due to public safety related to driveway access and sight distance along this stretch of Highway 1.

The primary current land use of the project site is open space preservation, with limited cattle grazing. There are no structures on the property. A paved driveway encroachment from Highway 1 provides access to the site near the north end of the property; the driveway includes a gate that restricts access. A small sign is posted at the gate indicating that the property is part of the Jenner Headlands Preserve. The project site contains gentler west- and southwest-facing slopes closer to Highway 1, with steeper slopes (approximately 40%) on the upper reaches of the property that are part of the Jenner Headlands. Vegetation on the site in the project area consists primarily of grasslands; delineated wetlands also occur in the project area.

Surrounding uses include open space lands and grazing. There are no residences adjacent to the property. Highway 1 runs along the west boundary of the site, with undeveloped State Parks lands west of the Highway leading down to the Pacific Ocean and, just to the south, the mouth of the Russian River. Russian Gulch lies approximately one mile to the north, with the town of Jenner approximately two miles to the south.

Project Details

Proposed Site Improvements

The project proposes to construct a public access to the Jenner Highlands Preserve. Key site improvements would include:

Parking lot and driveways. Access to the parking lot would be taken from an existing asphalt driveway connection to Highway 1. The existing paved driveway is 30 feet wide and 80 feet long; no changes are proposed to be made to this driveway. Driveway slopes would range from 8 to 15 percent, except adjacent to parking areas, where the cross-slopes would be limited to 2 percent. A 30-space trailhead parking lot plus 2 bus spaces would be constructed. The parking spaces would be 9 ft x 20 ft. Eight of the parking spaces would be for compact cars and two designated for ADA parking. The driveway width would be 20.5 ft by the parking stalls, and slightly narrower at the northern end where the driveway turns. Bicycle parking would be provided at the edge of the driveway, and space for two bus stalls would also be provided, alongside the south edge of the parking lot, separate from the vehicle driveway loop. Space for emergency vehicle turnaround would also be provided.

The parking lot U-shaped loop would be a one-way circulation loop, entering the site through the main gate leading to two parking areas, and exiting by a connection to the north side of the driveway approximately 30 feet from Highway 1. The parking stalls, bus stalls and driveway loop would be constructed with park tread paving. This material is intended to provide structural integrity but with reduced physical impact to a site. It is produced from quarried shale and chert, and designed to meet load and use requirements for parking lots, roads and trails. The color of the paving material can be modified to provide increased visual compatibility at the project site.

Related to parking lot and driveway construction, grading would occur along the hillside above, removing an estimated 182 cubic yards of earth. The cut material would be placed downslope and southwest of the parking lot and trail; see discussion below under wetlands construction and enhancement. This area would be regraded, and then planted with multi-story, native, upper-bank vegetation. An interceptor drain would also be placed along this upslope drainage area, leading to a swale that will provide for drainage detention/infiltration, draining to a lower bioswale.

- *Entry gate and fencing.* The parking lot and trail would be open from dawn to dusk every day, with entry and exit gates closed in the evenings. The

existing cyclone fence entry gate would be replaced with a decorative sliding gate. Protective fencing would be placed around wetlands.

- *Signage.* Information signage would be installed near the entry driveway, and with informational and interpretive signage and kiosks installed by the parking lot and along the trail to the scenic overlook.

- *Scenic overlook trail.* An approximately 400-foot long ADA-accessible trail would be built, leading to a scenic overlook of Highway 1 and the Pacific Ocean. The trail would generally follow the alignment of a former ranch road constructed on the project site. The scenic overlook would include several picnic tables. The overlook trail would also provide access to other trails on the project site.

- *Trash and recyclable materials containers.* These would be placed along the trail, between the parking lot and bathroom alongside the overlook trail.

- *Bathroom.* The project would include construction of an approximately 20 ft x 20 ft bathroom, to be placed alongside the overlook trail in a hollow area created by a former quarry operation, approximately 100 ft from the terminus of the trail and picnic area. The bathroom would be a two-unit, waterless vault toilet. The bathroom design would provide for use of dark colors and materials to blend in with the surrounding landscape.

- *Landscaping.* The parking lot area would be partially screened from Highway 1 by use of native trees and shrubs. The edges of the overlook trail would be planted with native flowering perennials. Approximately six acres of the project site (areas dominated by nonnative, annual-dominated grasslands) would be seeded with native grasses. Planting materials would vary based on placement at the site, but would include slough sedge, California oatgrass, horse tails, meadow barley, red fescue, blue-eyed grass, rushes, and Pacific reed grass by wetlands and drainage areas, and use of coyote brush, monkey flower, yarrow and iris in other areas closer to the trail.

- *Drainage improvements.* The parking lot and new driveway areas would be designed to drain to a central bioswale, which would provide for pre-filtration of runoff from the parking and driveway paving. The bioswale would then drain to an infiltration basin which would be constructed southeast of the existing driveway entrance. This basin would be approximately 60 ft x 100 ft, with rock placements. Flows would enter the basin from the bioswale, with basin flows then going to an existing drainage feature (gully). Additionally, gully stabilization work would occur at an existing drainage south of the proposed infiltration basin, addressing issues of erosion and bank stabilization.

- *Wetlands construction and enhancements.* Construction of the parking lot and path stabilization would entail fill placement on 0.18 acres of existing hillside wetlands. This would be offset by the creation of 0.35 acres of new wetlands, a net gain of 0.17 acres of wetlands. Additionally, the project would treat areas to enhance 0.32 acres of wetland attributes. A downslope area of the trail would have water delivery via drain outlets and related improvements, and planted with native wetland species. Other wetland areas would be enhanced with plug planting of native wetland species. Also noted is that soils cut from the area upslope of the parking lot would be spread thinly and compacted on an upland hillside area between the trail and Highway 1 that currently does not support wetland hydrology. This area would then be plug planted with wetland species.

- *Area of site development*. The total area of site development would be approximately 5.9 acres.

Maintenance

The parking lot, trail, bathroom, site landscaping and wetlands would be maintained by the applicant, with oversight by the Sonoma County Agricultural Preservation and Open Space District.

Environmental Finding:

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

Initial Study: See attached. For additional more information, please call Cynthia Demidovich, Planner III, at (707) 565-1754.

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

ISSUES RAISED BY THE PUBLIC OR AGENCIES

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

Sonoma County Regional Parks: Indicated enthusiastic support for the project.

The California Department of Transportation (Caltrans): Concurred with the project traffic study findings and has determined that no shoulder widening will be needed along Highway 1 as part of the project; requested the applicant provide an update to the site plan layout showing exiting details, including sight distance and profiles at Highway 1 by the project driveway, and including details on driveway turn details to support emergency vehicle access and large vehicle access; expressed concern over the driveway grade and ability to make safe vehicle turn movements; need for all curb ramps and sidewalks/crosswalks to meet ADA standards; seeks applicant fair-share contribution, financing and other details related to any mitigation measures which may affect Caltrans; and indicated that any work in the Caltrans right-of-way will require an encroachment permit.

Cloverdale Rancheria of Pomo Indians: Indicated that if the applicant discovers archaeological remains or resources during construction, the applicant should immediately stop construction and notify the appropriate Federal agency and local Tribes in the area.

Middletown Rancheria Tribal Historic Preservation Department: Indicated that there are no anticipated Lake Miwok archaeological, historic or Traditional Cultural Properties in or near the proposed project site.

California Historical Resources Information System, Northwest Information Center (NWIS): Indicated that previous studies have identified cultural resources at the project site, including remains of an historic-era dairy operation, and recommended site plan modifications as necessary to ensure avoiding any impact to the resources. Also indicated the project site has a low possibility of containing any archaeological resources.

OTHER RELATED PROJECTS

No other related projects are proposed.

RESPONSIBLE AND TRUSTEE AGENCIES

The project may require permits from the Sonoma County, Caltrans, California Department of Fish and Wildlife, California Regional Water Quality Control Board, North Coast Region, California State Water Resources Control Board ,US Fish and Wildlife Service, and/or the US Army Corps of Engineers, as follows.

- The Regional Water Quality Control Board (RWQCB) may require either a Section 401 Water Quality Certification, Waiver of Waste Discharge Requirements, Waiver of Waste Discharge Requirements with Additional conditions or Waste Discharge Requirements for impacts to wetlands or water quality.

- The U. S. Army Corps of Engineers (ACOE) will require a Nationwide Permit/or Individual Permit under Section 404 of the Clean Water Act for impacts to wetlands.

- Encroachment agreements may be required from Sonoma County and Caltrans.

- The State Water Resources Control Board (SWRCB) requires filing a Notice of Intent (NOI) with their agency to be covered under the National Pollutant Discharge Elimination System (NPDES) General Permit and preparation of a Storm Water Pollution Prevention Plan (SWPPP).

- Grading and building permits - Sonoma County Permit and Resource Management Department (PRMD) Sonoma County requires that building permits be obtained for construction of the bathroom, and issuance of a grading permit for site grading activities. The applicant will submit all required plans and obtain the permits prior to construction of the project.

Initial Study Checklist

This checklist is taken from Appendix G of the State CEQA Guidelines. For each item, one of four responses is given:

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

Each question on the checklist was answered by evaluating the project as proposed, that is, without considering the effect of any added mitigation

measures. The checklist includes a discussion of the impacts and mitigation measures that have been identified. Sources used in this Initial Study are numbered and listed on pages 69-70. Following the discussion of each checklist item one or more sources used are noted in parentheses.

The applicant has agreed to accept all mitigation measures listed in this checklist as conditions of approval of the proposed project and to obtain all necessary permits.

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" as indicated by the checklist on the following pages.

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

Incorporated Source Documents

In preparation of the Initial Study checklist, the following documents were referenced/developed, and are hereby incorporated as part of the Initial Study. All documents are available in the project file or for reference at the Permit and Resource Management Department.

_X_ Project Application and Description (Proposal Statement), Site Plans, Other Maps
_X_ Initial Data Sheet
_X_ Sonoma County General Plan and Associated EIR
_X_ Specific or Area Plan (Local Coastal Plan)
_X_ Sonoma County Zoning Ordinance
___ Sonoma County Rare Plant Site Identification Study
_X_ Project Referrals from Responsible Agencies
___ Full record of previous hearings on project in File
_X_ Correspondence received on project.
_X_ Other technical reports:

- *Project Planning, Description of Work, and Impact Avoidance Measures*, May 2015, Prunuske Chatham, Inc.
- *Vicinity Map and Site Plans, June 3, 2015, & April 7, 2015, Prunuske Chatham, Inc.*
- *Jenner Headlands Preserve Public Access, Pre-project Conditions, March 2015, Prunuske Chatham, Inc.*
- *Biological Resources Evaluation, Jenner Headlands Preserve –*

Parking Lot Project, January 2014, Prunuske Chatham, Inc.

- *Preliminary Delineation of Wetlands Jenner Headlands Preserve – Parking Lot Project*, January 2015, Prunuske Chatham, Inc.
- *Drainage Report – Jenner Headlands Preserve Parking Lot Project*, March 2015, Prunuske Chathman, Inc.
- *A Cultural Resources Study for the Jenner Headlands Access Project*, January 2014, Tom Origer & Associates. (Confidential on file at PRMD)
- *Traffic Study for the Jenner Headlands Trail Access*, April 2014, Whitlock & Weinberger Transportation, Inc.
- *Summary of Jenner Headlands Public Access Project – Visual Analysis*, March 2014, Prunuske Chatham, Inc.
- *Assessor Parcel Map 099-030-003*
- *PLP15-0049 Planning Application*

1. AESTHETICS: *Would the project:*

a) Have a substantial adverse effect on a scenic vista?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant. The Sonoma Coast is a scenic resource vital to the County. Highway 1 by the project site is designated as a County Scenic Corridor, and the proposed development area of the property is classified as a Scenic Landscape Unit (General Plan Figures OSRC-1 and OSRC-5a), and there are several General Plan and Local Coast Plan policies that apply, including:

- GOAL OSRC-2: Retain the largely open, scenic character of important Scenic Landscape Units.
- Objective OSRC-2.1: Retain a rural, scenic character in Scenic Landscape Units wit very low intensities of development. Avoid their inclusion wit spheres of influence for public service providers.
- Objective OSRC-2.2: Protect the ridges and crests of prominent hills in Scenic Landscape Units from the silhouetting of structures against th skyline.
- Objective OSRC-2.3: Protect hills and ridges in Scenic Landscape Units from cuts a fills.
- Policy OSRC-2d: This policy provides design criteria for new development, within Scenic Landscape Units, including considerations of grading, and structure design, materials and colors.
- Objective LU-10.1: Accomplish development on lands with important biotic resources and scenic features in a manner which preserves or enhances these features.
- Policy OSRC-3c: Establish a rural Scenic Corridor setback of 30 percent of the depth of the lot to a maximum of 200 feet from the centerline of the road unless a different setback is provided.

The project would not involve tree removals. Grading would be required in the area above the parking lot, and with placement of fill from the parking lot grading on a slope between the trail and Highway 1. However, the grading is not extensive, and would not significantly affect a scenic vista. The proposed parking lot would be situated slightly upslope from the adjoining Highway 1 roadway, and partially screened from view by landscaping. Where grading does occur, landscape plantings and seeding will be provided. The proposed soils cut from the area upslope of the parking lot would be spread thinly and compacted

on an upland hillside area between the trail and Highway 1 that currently does not support wetland hydrology. This area would then be plug planted with wetland species. A 20 ft x 20 ft bathroom facility will be built at the site, to be located along the overlook trail and sited in the hollow of a small former quarry area and set back 300 feet from Highway 1. Additionally, design of the structure, including use of dark colors matching the surrounding landscape, will ensure minimizing potential for visual intrusiveness as seen from Highway 1 (north and southbound traffic).

The applicant also prepared a visual analysis of the Jenner Headlands Public Access Project (Prunuske Chatham, Inc., March 2014), in which balloons were placed at proposed development locations to determine potential view impacts from locations along Highway 1 north and south of the project site, at the Goat Rock parking area along Higway 1, and at the Pomo Canyon Trail Overlook. The study determined that views of the proposed development area from the Highway 1 north pullout, Goat Rock parking lot and Pomo Canyon Trail Overlook would be possible, but the balloons were not visible with unaided vision. Views of the project development from south of the project site on Highway 1 were blocked. (1-5, 7)

Mitigation Measures: None required.

Mitigation Monitoring: N/A

b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. The Sonoma Coast is a scenic resource vital to the County. Highway 1 by the project site is designated as a County Scenic Corridor, and the proposed development area of the property is classified as a Scenic Landscape Unit (General Plan Figures OSRC-1 and OSRC-5a). See discussion above under item 1.a. This impact would be less than significant. (1-5, 7)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. The Sonoma Coast is a scenic resource vital to the County. Highway 1 by the project site is designated as a County Scenic Corridor, and the proposed development area of the property is classified as a Scenic Landscape Unit (General Plan Figures OSRC-1 and OSRC-5a). See discussion above under item 1.a. This impact would be less than significant. (1-5, 7)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime view in the area?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. The project does not propose use of any lighting, and would not involve nighttime work. (3)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

2. AGRICULTURE AND FOREST RESOURCES:

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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	Less than Significant with Mitigation Incorporation	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 non-agricultural use?				X
Comment: **No Impact.** According to the State of California, Important Farmlands Finder (http://maps.conservation.ca.gov/ciff/ciff.html - accessed January 28, 2016), the project site is not designated as Prime or Unique Farmland, or farmland of Statewide Importance. The project therefore would have no potential impacts to these agricultural lands. (8)				
Mitigation Measures: None required.				
Mitigation Monitoring: N/A.				
b) Conflict with existing zoning for agricultural use, or Williamson Act Contract?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. The project site is designated as Land Extensive Agriculture in the County's General Plan, Local Coastal Plan and Zoning. The primary use in this category is agriculture and grazing lands. The site is not included in a Williamson Act Contract (Sonoma County Map of Williamson Act Land Contracts (http://www.sonoma-county.org/prmd/gisdata/pdfs/wact.pdf)). (9)

Mitigation Measures: None required.

Mitigation Monitoring: N/A.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. The project site is not zoned TP (Timberland Production) zoning district. It would not conflict with existing zoning, which is Land Extensive Agriculture, Coastal Zone (LEA-CC). No trees would be removed for project construction. Therefore it would have no effect on any forest or timberlands, nor would it affect timber production. (1-2)

Mitigation Measures: None required.

Mitigation Monitoring: N/A.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. See Item c), above. The project would not result in the loss of forest land. The project site does not have a commercial timber forest. (1-2)

Mitigation Measures: None required.

Mitigation Monitoring: N/A.

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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. The project does not involve other change in the environment that could result in conversion of farmland to non-agricultural use or forest-land to non-forest use. (3)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

3. AIR QUALITY:

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. The project site is under the jurisdiction of the Northern Sonoma County Air Pollution Control District (NSCAPCD). The NSCAPCD is in attainment for all criteria pollutants and does not have an adopted air quality plan. Therefore, the proposed project would result in a less-than-significant impact. (10-12)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. The NSCAPCD does not have any adopted CEQA thresholds of significance for criteria air pollutants. The NSCAPCD recommends using the Bay Area Air Quality Management District (BAAQMD) adopted CEQA thresholds of significance to evaluate the significance of criteria air pollutants.

The BAAQMD adopted significance thresholds for construction-related criteria air pollutants are presented below. Criteria air pollutant emissions from construction are calculated as average daily emissions (the total construction emissions from a project divided by the number of construction days).

Reactive Organic Gases (ROG) = 54 pounds per day (lbs/day)
Nitrogen Oxides (NO_x) = 54 lbs/day
Particulate Matter (PM10) = 82 lbs/day (exhaust)
Particulate Matter (PM2.5) = 54 lbs/day (exhaust)

Average daily construction criteria pollutant emissions from the proposed project would be very minimal, with construction activities localized and short-term in nature involving preparation of the parking lot, trail, and bathroom. The proposed project would have to comply with NSCAPCD Rule 430 – Fugitive Dust Emissions, which requires basic dust control management practices to prevent particulate matter from becoming airborne. Criteria air pollutant emissions would be well below BAAQMD CEQA significance thresholds and construction activities would comply with all NSCAPCD rules, therefore, the proposed project would result in a less-than-significant impact. (10-12)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

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 Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. The NSCAPCD is in attainment for all criteria pollutants and average daily construction emissions would be below BAAQMD CEQA significance thresholds. Therefore, the proposed project would result in a less-than-significant cumulative impact. (10-12)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

d) Expose sensitive receptors to substantial pollutant concentrations?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. Construction activities would entail the use of diesel equipment that would generate emissions of diesel particulate matter (DPM), which the California Air Resources Board (CARB) has categorized as a human carcinogen. Typically, health risks are estimated based on a chronic exposure period of 70 years. Because exhaust emissions associated with construction activities of the proposed project would be relatively low, short-term in nature, and move throughout the project vicinity (limiting the potential prolonged exposure to any sensitive receptors), it is not anticipated that exposure to construction-related DPM would result in an elevated health risk. Therefore, the proposed project would result in a less-than-significant impact. (12)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

e) Create objectionable odors affecting a substantial number of people?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. Project construction and operation would not generate objectionable odors nor be located in an area subject to objectionable odors. Therefore, the proposed project would result in a less-than-significant impact. (3, 5-6)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

4. BIOLOGICAL RESOURCES:

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	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		

Comment:

Less than Significant with Mitigation: The applicant conducted site delineation and biological studies of the project site (Prunuske Chatham, Inc., January 2014 and January 2015). These studies included literature reviews and site surveys. The project site was determined to be predominantly grasslands with non-native species. Sensitive habitat, in the form of seasonal wetlands along seeps and drainages, were found. Additionally, the project site was found to support several special-status species, including Harlequin lotus, American badgers and possibly California red-legged frogs, and contains breeding/wintering/foraging habitat for several special-status birds, including grasshopper sparrows, northern harrier, white-tailed kite and burrowing owls.

The Local Coastal Plan Environmental Policy No. 18 prohibits filling, grading, diking, dredging, and construction in wetlands, except under special conditions delineated in the Coastal Act Section 30233, and Policy No. 25 prohibits construction of agricultural, commercial, industrial, and residential structures within 100 feet of wetlands.

The project site contains delineated wetlands that would be impacted by the project through the construction of a small portion of the parking lot, and the driveway, trail and drainage systems. The key recommendation from the studies was to maintain a buffer of at least 25 feet around wetlands and drainages, though it was recognized that some work will be required in the wetlands near drainage features southeast of the proposed parking lot. Where wetlands are to be impacted, the project proposes enhancement of wetlands at a 2:1 ratio through restoration of new wetlands southeast of the parking lot and drainage area. The proposed parking lot would be sited 35-50 feet from the edge of the

drainage below to comply with the County's 25-foot setback requirement for undesignated streams. (3-5, 13-14)

Mitigation Measures: The project shall implement all recommendations of the Prunuske Chatham, Inc., January 2014 Biological Resources Evaluation prepared for the project. This includes performance of spring botanical surveys, use of Best Management Practices during construction, maintenance of a minimum 25 foot setback from wetlands as feasible, except as noted on the site development plans, use of protective fencing during construction, and training session on biological impacts for the construction crews.

Mitigation Monitoring: The County shall require that the applicant's biologist establish a checklist for implementation of all mitigation measures contained in the Prunuske Chatham, Inc., January 2014 Biological Resources Evaluation. PRMD shall review and approve the checklist, and shall review implementation procedures with the project biologist and/or biological monitor prior to issuance of grading or encroachment permits and the start of the project. The biological monitor shall provide daily verification of implementation of each of these measures, as applicable. The Project planner or other County staff or their designee shall make inspections, as needed, to assure mitigation measures are properly implemented.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
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		

Comment:

Less than Significant with Mitigation: The project site contains delineated wetlands and sensitive natural communities that would be impacted by the project through the construction of the parking lot, driveway and trail. See discussion above under item 4.a. (3-5, 13-14)

Mitigation Measures: See mitigation measure above, under item 4.a.

Mitigation Monitoring: See mitigation monitoring provision above, item 4.a.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No impact
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?		Incorporation		
		X		

Comment:

Less than Significant with Mitigation. The project site contains delineated wetlands and sensitive natural communities that would be impacted by the project through the construction of the parking lot, driveway and trail. See discussion above under item 4.a. (3-5, 13-14)

Mitigation Measures: The applicant shall obtain all necessary permits and approvals related to development of delineated wetlands areas on the project site, including from the U.S. Army Corps of Engineers. This shall include provision for construction of new wetlands and enhancement of wetlands as described in the project application and supporting Prunuske Chatham, Inc., January 2014 Biological Resources Evaluation and January 2015 Preliminary Delineation of Wetlands.

Mitigation Monitoring: The applicant shall provide evidence of having obtained all necessary permits and approval prior to County issuance of a grading permit. The Project planner or other County staff or their designee shall make inspections, as needed, to assure mitigation measures are properly implemented.

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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant: The project would involve construction of a parking area and overlook trail on a 473-acre property, part of the larger Jenner Headlands Preserve. The proposed improvements would be small in area and would not involve any significant changes to any wildlife migration routes or movement of fish or wildlife. (3-5)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

e) Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
		X		

Comment:

Less than Significant with Mitigation: The project proposes development of sensitive biological resources (delineated wetlands) as part of parking lot development. However, the project proposes both creation and enhancement of wetlands that will offset this impact. No tree removals are proposed. See discussion above under item 4.a. (1-5)

Mitigation Measures: See mitigation measure above, under item 4.a.

Mitigation Monitoring: See mitigation monitoring provision above, item 4.a.

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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. Habitat conservation plans and natural community conservation plans are site- or region-specific plans to address effects on sensitive species of plants and animals and their habitats. The project site is not located in an area subject to a habitat conservation plan or natural community conservation plan. (1-2)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

5. CULTURAL RESOURCES: *Would the project*:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
		X		

Comment:

Less than Significant with Mitigation Incorporation. The applicant conducted a Cultural Resources Study of the project site (Tom Origer & Associates, January 2014). The study included archival research at the Northwest Information Center, Sonoma State University and field inspection of the project area. The study found that the project site was the location of the former Rule Ranch, established in 1867. The on-site inspection found remains of the historic-era dairy within the study area, and recommended avoidance of this area by site development. Project plans (area of disturbance) would avoid the identified resource area.

Additionally, comments were received from the following Tribal contacts:

Middletown Rancheria Tribal Historic Preservation Department: Indicated that there are no anticipated Lake Miwok archaeological, historic or Traditional Cultural Properties in or near the proposed project site.

California Historical Resources Information System, Northwest Information Center (NWIS): Indicated that previous studies have identified cultural resources at the project site, including remains of an historic-era dairy operation, and recommended site plan modifications as necessary to ensure avoiding any impact to the resources. Also indicated the project site has a low possibility of containing any archaeological resources.

Mitigation is proposed to ensure that any accidental discovery of prehistoric or historic resources. (3, 15)

Mitigation Measures:

5.a(1): If concentrations of prehistoric or historic-era cultural materials are encountered during project activities, all work in the immediate vicinity shall be halted until a qualified archaeologist can evaluate the finds and make recommendations. Prehistoric materials might include obsidian and chert flaked-stone tools (e.g. projectile points, knives, scrapers) or toolmaking debris;

culturally darkened soil ("midden") containing heat-affected rock, artifacts, food bone, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, or handstones). Historic-era materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic materials. The Cultural Resources Study recommended that monitoring occur by a qualified archaeologist if the work occurred in the sensitive area. The project was revised and the picnic area was moved out of the sensitive area and monitoring is not required.

5.a.(2): If human remains are encountered, work in the vicinity of the remains shall be halted and, as required by law, the County Coroner shall be notified immediately. At the same time, an archaeologist should be contacted to evaluate the situation. If human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission within 24 hours of that determination.

Mitigation Monitoring:
The applicant shall advise the County and appropriate authorities and local Tribes if cultural or historic resources or human remains are discovered during site development.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
		X		

Comment:

Less than Significant with Mitigation Incorporation. See item 5(a) above. There are known archaeological resources on the site. In addition, the project could uncover such materials during construction. (3, 15)

Mitigation Measures:
Mitigation measures 5.a(1) through 5.a(2), above, would reduce the impact to less than significant.

Mitigation Monitoring:
See Item 5.a, above.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

There are no known geological resources or significant geological or paleontological resource features on the project site. (1, 5, 15)

Less than Significant Impact:

No mitigation required.

Mitigation Measures: None required.

Mitigation Monitoring: None required.

d) Disturb any human remains, including those interred outside of formal cemeteries?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
		X		

Comment:

Less than Significant with Mitigation Incorporation. There is a possibility that human remains might be encountered during ground-disturbing activities within the study area. Section 7050.5 of the California Health and Safety Code states that it is a misdemeanor to knowingly disturb a human burial. In the event that human remains are unearthed during construction, state law requires that the County Coroner be notified to investigate the nature and circumstances of the discovery. At the time of discovery, work in the immediate vicinity would cease until the Coroner permitted work to proceed. If the remains were determined to be prehistoric, the find would be treated as an archaeological site and the mitigation measures described in item 5(a) above would apply. (15)

Mitigation Measures:
See Item 5(a), above.

Mitigation Monitoring:
See Item 5(a), above.

6. GEOLOGY AND SOILS: *Would the project*:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
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

Comment:

The project site is not within a fault hazard zone as defined by the Alquist-Priolo fault maps. (16)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

ii. Strong seismic ground shaking?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant: All of Sonoma County is subject to seismic shaking that would result from earthquakes along the San Andreas, Healdsburg-Rodgers Creek, and other faults. The project area is mapped as subject to “violent” seismic shaking associated with strong earthquakes on the San Andreas fault (per Figure PS-1a, General Plan).

Predicting seismic events is not possible, nor is providing mitigation that can entirely reduce the potential for injury and damage that can occur during a seismic event. However, using accepted geotechnical evaluation techniques and appropriate engineering practices, potential injury and damage can be diminished, thereby exposing less property to the effects of a major damaging

earthquake. Project conditions of approval will require that a building permit be obtained for all construction, including the new bathroom structure, and that the project meet all standard seismic and soil test/compaction requirements. The project would therefore not expose people to substantial risk of injury from seismic shaking. (1, 24)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

iii. Seismic-related ground failure, including liquefaction?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact: The project site is located within an area subject to low and very-low liquefaction as shown on ABAG seismic hazard maps. It is not shown as being in an area subject to liquefaction hazards on the Sonoma County General Plan Liquefaction Hazard Map (Figure PS-1c).

The bathroom structure will be required to meet building permit requirements, including seismic safety standards and soil test/compaction requirements. Based on standard permitting requirements, the project will have no significant risk of loss, injury or death from seismic ground failure or liquefaction. (1)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

iv. Landslides?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact: The project site is not located in a landslide-prone area as shown on General Plan Figure PS-1d. (1)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

b) Result in substantial soil erosion or the loss of topsoil?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
		X		

Comment:

6.b. Less Than Significant with Mitigation. The project includes cuts and fills that require the issuance of a grading permit. Unregulated grading, both during and post construction, has the potential to increase soil erosion on and off site, which could adversely impact on-site wetlands and downstream water quality.

However, in regard to potential water quantity impacts, County Grading Ordinance design and adopted best management practices require inspection by County inspectors that ensures that all work is constructed according to the approved plans. The Ordinance requirements and adopted best management practices are specifically designed to maintain potential project water quantity impacts at a less than significant level during and post construction. In addition, the project proposes to implement erosion control and revegetation measures, as described in the Project Description.

County Grading Ordinance design requirements, adopted County grading standards and best management practices (such as silt fencing, straw wattles, construction entrances to control soil discharges, primary and secondary containment areas for petroleum products, paints, lime and other materials of concern, etc.), mandated limitations on work in wet weather, and standard grading inspection requirements, are specifically designed to maintain potential water quality impacts at a less than significant level during project construction.

For post-construction water quality impacts adopted water quality best management practices include storm water treatment devices based on filtering, settling or removing pollutants. These construction standards are specifically designed to maintain potential water quality grading impacts at a less-than-significant level post construction.

The County adopted grading ordinances and standards and related conditions of approval that enforce them are specific, and also require compliance with all standards and regulations adopted by the State and Regional Water Quality

Control Board, such as the Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, Low Impact Development (LID) and any other adopted best management practices. Therefore, no significant adverse soil erosion or related soil erosion water quality impacts are expected given the mandated conditions and standards that need to be met. See further discussion of related issues (such as maintenance of required post construction water quality facilities) under Section 8, Hydrology and Water Quality.

This impact can be reduced to less than significant by using standard construction erosion control measures at the project site (see Mitigation Measure 6.b.1). (1)

Mitigation Measure:

The applicant shall submit an Erosion and Sediment Control Plan prepared by a registered professional engineer as an integral part of the grading plan. The Erosion and Sediment Control Plan shall be subject to review and approval of the Permit and Resource Management Department prior to the issuance of a grading permit. The Plan shall include temporary erosion control measures to be used during construction of any cut and fill slopes, excavation for foundations, and other grading operations at the site to prevent discharge of sediment and contaminants into the drainage system. The Erosion and Sediment Control Plan shall include the following measures as applicable:

a) Throughout the construction process, ground disturbance shall be minimized and existing vegetation shall be retained to the extent possible to reduce soil erosion. All construction and grading activities, including short-term needs (equipment staging areas, storage areas and field office locations) shall minimize the amount of land area disturbed. Whenever possible, existing disturbed areas shall be used for such purposes.

b) All drainage ways and wetland areas not identified for development shall be protected from silt and sediment in storm runoff through the use of silt fences, diversion berms, and check dams. Fill slopes shall be compacted to stabilize. All exposed surface areas shall be mulched and reseeded and all cut and fill slopes shall be protected with hay mulch and /or erosion control blankets as appropriate.

c) All erosion control measures shall be installed according to the approved plans prior to the onset of the rainy season but no later than October 15th. Erosion control measures shall remain in place until the end of the rainy season, but may not be removed before April 15th.

Mitigation Monitoring:
Building/grading permits for ground disturbing activities shall not be approved for issuance by Project Review staff until the above notes are printed on applicable building, grading and improvement plans. The applicant shall be responsible for notifying construction contractors about erosion control requirement.

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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant: The project site is subject to seismic shaking as described in item 6.a.ii., above. The project site is not identified as having liquefaction hazards as shown on Figure PS-1c (Liquefaction Hazard Areas Map, General Plan). Standard County building permit requirements and review will ensure less than significant impact related to landslide, lateral spreading, subsidence or liquefaction. (1)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

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 Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant: The bathroom structure and driveway/parking lot areas will be required to meet building permit and County grading and construction requirements, including seismic safety standards and soil test/compaction requirements. Based on standard permitting requirements, the project will have no significant risk of loss, injury or death from expansive soils. (1)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
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

Comment:

No impact. The project would generate minimal wastewater. The project bathroom will a two-unit, vault toilet that would be pumped to a truck to remove wastes from the site. There project therefore would have no impact related to site soils and use of a septic system. (3)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

7. GREENHOUSE GAS EMISSIONS: *Would the project:*

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. Greenhouse gases (GHGs) trap heat in the atmosphere. Increases in GHGs due to human activity are associated with Global Climate Change (aka "Global Warming"), that is, the change in the average weather on earth, as measured by wind patterns, storms, precipitation and temperature. The primary greenhouse gases are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_20), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H_20). CO_2 is the reference gas for climate change and emissions of GHGs in general are reported as CO_2 equivalents (CO_2e).

The California Air Resources Board (CARB) is required by the Global Warming Solutions Act of 2006 to design and implement emissions limits, regulations, and other statewide measures to reduce statewide GHG emissions to 1990 levels by 2020. The Act does not indicate what role local land use planning should play in the statewide strategy or how environmental review under CEQA is implicated. In October 2007, CARB published the Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration. None of the early action measures address how local agencies should address GHG emissions associated with land use applications.

In 2005, the Sonoma County Board of Supervisors adopted the Sonoma County Climate Protection Campaign, which sets a target to reduce GHG emissions to 25% below 1990 levels by the year 2015. The Sonoma County Community Climate Action Plan (the blueprint to help Sonoma County achieve its emissions target) was published in 2008. The Climate Action Plan does not include any policies or actions to reduce GHG emissions from construction. (19)

The Bay Area Air Quality Management District (BAAQMD) drafted a significance threshold of 1,100 metric tons of CO_2e per year for determining a project's operational GHG emissions impact. (20) That threshold has been the subject of a legal challenge. However, the claims made in the case are not relevant to the scientific soundness of the BAAQMD's analysis of what levels of GHG emissions should be deemed significant.

The Northern Sonoma County Air Pollution Control District (NSCAPCD) supports the use of the BAAQMD GHG significance threshold of 1,100 metric tons of CO_2e per year for the proposed project. (21) GHG emissions associated with the proposed project, limited to minor site grading, construction of the bathroom and trail, with related drainage and wetlands improvements, are anticipated to be well below the BAAQMD's GHG significance threshold of 1,100 metric tons of CO_2e per year. Therefore, the proposed project would result in a less-than-significant impact.

Mitigation Measures: None required.

Mitigation Monitoring: None required.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. The proposed project is a temporary construction project and GHG emissions would be well below the BAAQMD's GHG significance threshold. The Climate Action Plan does not include any policies or actions to reduce GHG emissions from construction. Therefore, the proposed project would not conflict with the Sonoma County Community Climate Action plan or any other plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, the proposed project would result in a less-than-significant impact. (20)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

8. HAZARDS AND HAZARDOUS MATERIALS: *Would the project:*

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
		X		

Comment:

Less than Significant with Mitigation: Construction would require use of fuels and other hazardous materials. Improper storage or handling of these materials could result in spills. The impact can be reduced to less than significant by requiring standard approved construction methods for handling hazardous materials. (3-4)

Mitigation Measure:

8.a: The construction contract shall require that any storage of flammable liquids be in compliance with the Sonoma County Fire Code and section 7-1.01G of the Caltrans Standard Specification (or the functional equivalent) for the protection of surface waters. In the event of a spill of hazardous materials the Contractor shall immediately call the emergency number 9-1-1 to report the spill, and will take appropriate actions to contain the spill to prevent further migration of the hazardous materials to storm water drains or surface waters.

Mitigation Monitoring:

Construction contract language regarding compliance with the Sonoma County Fire Code and section 7-1.01G of the Caltrans Standard Specification (or the functional equivalent, as well as spill response actions, shall be provided to County staff for review and approval prior to any Project construction.

Mitigation Measure:

8.b: During construction, hazardous materials shall be stored away from drainage or environmentally sensitive areas, on non-porous surfaces. Storage of flammable liquids shall be in accordance with Sonoma County Fire Code. At no time shall concrete waste be allowed to enter waterways, including creeks and storm drains.

Vehicle storage, fueling and maintenance areas shall be designated and maintained to prevent the discharge of pollutants to the environment. Spill cleanup materials shall be kept on site at all times during construction, and spills

shall be cleaned up immediately. In the event of a spill of hazardous materials, the applicant will call 911 to report the spill and take appropriate action to contain and clean up the spill.

Portable toilets shall be located and maintained to prevent the discharge of pollutants to the environment.

Mitigation Monitoring:

Building/grading permits shall not be approved for issuance by PRMD until the above notes are printed on the building, grading and improvement plans. The applicant shall be responsible for notifying construction contractors about the requirement for responsible storage and spill cleanup of hazardous materials.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
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		

Comment:

Less than Significant with Mitigation: During construction there could be spills of hazardous materials. See Item 8.a., above. (3-4)

Mitigation Measures:
See item 8.a, above.

Mitigation Monitoring:
See item 8.a, above.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X

Comment:

No Impact. There are no existing or proposed schools within 0.25 miles of the project site. (5)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. The project site was not identified on, or in the vicinity of, any parcels on lists compiled by the California Environmental Protection Agency, Regional Water Quality Control Board, or California Department of Toxic Substance Control. (22)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. The site is not within an airport land use plan as designated by Sonoma County, and there are no aspects of the project construction or operation that would create a hazard for people living or working in the project area. (1, 5)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
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

Comment:

No Impact. There are no private airstrips in the vicinity of the project site, and there are no aspects of the project construction or operation that would create a hazard for people living or working in the project area. (1, 5)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X

Comment:

No Impact. The project would not impair implementation of, or physically interfere with the County's adopted emergency operations plan. There is no separate emergency evacuation plan for the County. No roads would be closed during on-site grading and construction. On-site emergency vehicle turnaround areas have been shown on the project site plan. The project would not change existing circulation patterns. (1, 3)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
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 of where residences are intermixed with wildlands?				X

Comment: **No Impact**. The project would not expose people to risk from wildland fires. The project includes only one small structure (400 sq ft bathroom), with relatively low wildland fire hazard due to absence of significant vegetative fuels in the immediate area of the structure. (1, 5)
Mitigation Measures: None required.
Mitigation Monitoring: None required.

9. HYDROLOGY AND WATER QUALITY: *Would the project:*

a) Violate any water quality standards or waste discharge requirements?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
		X		

Comment:

Less than Significant Impact with Mitigation: Most of the project area drains directly to the Pacific Ocean via a system of small natural drainages and man-made drainage swales. The site also contains a number of springs, seeps, and wetland areas (see Item 4.c, Biological Resources). Because the project would have over an acre of ground disturbance, project construction would be is subject to the requirements of the State Water Resources Control Board General Permit for Construction Projects.

As described in Items 6.b. and 8.a, above, the project could affect water quality via erosion/sedimentation and release of hazardous materials. However, project design considerations combined with mitigation measures identified in those sections of the Initial Study, would reduce this impact to a less-than-significant level.

With implementation of mitigation measures, the project would not have any significant the potential to contaminate surface waters. (1, 3, 5)

Mitigation Measures:

This project is subject to the National Pollution Discharge Elimination System (NPDES) requirements, and coverage under the State General Construction Permit, as adopted by the State Water Resources Control Board (SWRCB). A copy of the Notice Of Intent (NOI) filed with the SWRCB, as well as the Waste Discharge Identification Number (WDID) issued by that agency must be submitted to the Drainage Review Section of the Permit and Resource Management Department.

Mitigation Monitoring:

The Permit and Resource Management Department shall not issue the Building Permit until the NOI and the WDID have been received.

b) Substantially deplete groundwater supplies or interfere substantially	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No impact

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)?		Incorporation		
				X

Comment:

Less than Significant Impact. The project does not involve the use of groundwater. The bathroom facility will be waterless, using a pumper truck to remove wastes. The project therefore will have no impact on groundwater supplies or resources. (3)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. Most of the project area drains directly to the Pacific Ocean via a system of small natural drainages and man-made drainage swales. Precipitation, surface runoff, and groundwater contribute to the hydrology of the proposed alignment. Aquatic features in the proposed alignment include seasonal wetlands, gullies and Highway 1 roadside ditches. A number of un-named drainages within the proposed alignment convey stormwater runoff from adjacent upland areas.

The applicant prepared a Jenner Headlands Drainage Report (Prunuske Chatham, Inc., March 2015). The study evaluated existing drainage systems at the site and identified necessary drainage improvements to support the proposed project. The parking lot and new driveway areas would be designed to drain to a

central bioswale, which would provide for pre-filtration of runoff from the parking and driveway paving. The bioswale would then drain to an infiltration basin which would be constructed southeast of the existing driveway entrance. This basin would be approximately 60 ft x 100 ft, with rock placements flows would enter from the bioswale. Flows from the infiltration basin would then go to an existing drainage feature (gully). Additionally, gully stabilization work would occur at an existing drainage south of the proposed parking lot.

The project was reviewed by the Sonoma County PRMD Storm Water and Grading Section and a condition of approval requires that grading and drainage improvement plans be reviewed and approved by PRMD prior to the issuance of any development permits. Erosion and sediment control measures are required to be included in the plans.

Therefore it would have insignificant effect on drainage patterns or runoff quantities. (3, 4, 18)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
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 an a manner which would result in flooding on- or off-site?			X	

Comment:

Less than Significant Impact. See discussion in Item c, above. (3, 4, 18)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
e) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide			X	

substantial additional sources of polluted runoff?				

Comment:

Less than Significant Impact. As described above, the project would not substantively alter impervious surfaces. Pavement would be installed in the areas of the driveway, parking lot, bathroom and trail. The largest of the features, the parking lot, would include approximately 34,000 sq ft (0.78 acres) of impervious surface area. Drainage from these improvements would be redirected back to the site and its series of natural filtration systems. Storm drainage systems would be provided at key drainage locations; these systems have been designed to provide for natural filtration. Therefore, the project would have no significant effect on runoff quantities or storm drainages. (3, 4, 18)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
f) Otherwise substantially degrade water quality?			X	

Comment:

No Impact. The project proposes grading of the project site for the installation of driveway, parking lot and trail areas. Additionally, storm water drainage improvements are proposed. See discussion above, item 6.b, regarding soil erosion. The project therefore will not involve other changes in the environment that could result in substantially degraded water quality. (3, 18)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
g) Place housing within a 100-year hazard area as mapped on a federal Flood hazard Boundary of Flood Insurance Rate Map or other flood hazard delineation map?				X

Comment:

No Impact. The project does not include housing and is not located in a flood hazard area (General Plan Map PS-1e). (1, 23)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				X

Comment:

No Impact. The project site is not located in a flood hazard area (General Plan Map PS-1e). (1)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
i) 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?				X

Comment:

No Impact. The project site is not located in an area subject to flooding as a result of dam failure (General Plan Map PS-1f). (1)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

j) Inundation by seiche, tsunami, or mudflow?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. The project site is not located in an area subject to seiche or tsunami. (http://gis.abag.ca.gov/website/Hazards/?hlyr=tsunami accessed January 28, 2016). (1, 17) The parking lot, driveway and trail areas are not subject to mudflow hazards. Grading of the hillside above the parking lot area will be subject to compliance with County grading standards and inspections.

Mitigation Measures: None required.

Mitigation Monitoring: None required.

10. LAND USE AND PLANNING: *Would the project*

a) Physically divide an established community?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. The project involves construction of a parking lot and overlook trail. The project site is located approximately two miles north of the community of Jenner, and would not create potential to divide the community. (1, 3, 5)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant. The proposed project is located within the Coastal Zone, and thereby the project is subject to the provisions of the Sonoma County Local Coastal Plan (1981, amended 2001). The Land Use Section of the Coastal Plan formulates development policies that, together with the Land Use Plan maps, indicate the type, location, and intensity of land uses permitted in the Coastal Zone.

Additionally, the Local Coastal Plan contains the following provision:

LCP: 32. High Cliffs - Proposed Vista Point Discussion: South of the slide, turnout areas are provided on both sides of Highway 1. Recommendations: Designate as an official scenic vista point. Provide formal parking areas and develop interpretive facilities. Erect road signs to notify the public about the

visitor stop. Development Priority: III.

The applicant has requested a Coastal Development Permit and a Conditional Use Permit to allow development of a parking lot, overlook trail and related site improvements as part of the Jenner Headlands Preserve.

The project site is designated as Land Extensive Agriculture under the General Plan and Local Coastal Plan. The LEA category is intended to enhance and protect lands capable of and generally used for animal husbandry and the production of food, fiber, and plant materials. Soil and climate conditions typically result in relatively low production per acre of land. In this instance, the project site is primarily used for open space as part of the Jenner Headlands Preserve, but also includes limited grazing activities.

Pursuant to the Sonoma County Coastal Plan Element of the General Plan, relative to visual resources, Coastal Policy 30251 states in part:

"The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance…"

Coastal Policy 30253 states:

New development shall, where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.

The Coastal Plan as it relates to visual resources recommends preventing development (including buildings, structures, fences, paved areas, signs and landscaping) from obstructing views of the shoreline from coastal roads, vista points, recreation areas and beaches.

Relative to Alterations of Landforms, under Item 4 (page 173), the Coastal Plan states:

Minimize visual destruction of natural landforms caused by the cutting, filling, and grading for building sites, access roads and public utilities by:

Concentrating development on level areas so that steeper hillsides are left undisturbed, prohibiting new development which requires grading, cutting, or filling that would significantly and permanently alter or destroy the appearance of natural landforms. Restoring landforms, as completely as possible after any permitted temporary alteration during construction, timber harvesting, or mineral extraction. Construction roads, buildings, and other structural improvements to fit the natural topography. Sharing private roads and driveways.

Cliffs and Bluff locations are discussed on page 176 of the Coastal Plan, which states:

"Locate structures within or behind existing tree cover such that they are screened from scenic corridor routes. When there is limited opportunity to screen proposed structures from scenic corridor routes, design review shall ensure that:

a.) The structure's design compliments and is in scale with surrounding environment.
b.) If possible structures shall be screened by using alternative siting or existing landforms.
c.) When no other measures to screen development from scenic corridor routes are feasible, a landscape design is developed that relies upon native tree and shrub species to: (1) screen the structure but not, over time grow to block ocean or coastline views from scenic corridor routes, (2) integrate the man and natural environments, and (3) effectively screen the structure from the scenic corridor route within 5 years."

In response to the above policies and objectives, grading would be required in the area above the parking lot, and with placement of fill from the parking lot grading on a slope between the trail and Highway 1. However, the grading would not significantly affect a scenic vista. The proposed parking lot would be situated slightly upslope from the adjoining Highway 1 roadway, and partially screened from view by landscaping. Where grading does occur, vegetation plantings will be provided. The proposed soils cut from the area upslope of the parking lot would be spread thinly and compacted on an upland hillside area between the trail and Highway 1 that currently does not support wetland hydrology. This area would then be plug planted with wetland species. 20 ft x 20 ft bathroom facility will be built at the site, to be located along the overlook trail and sited in the hollow of a small former quarry area 300 feet from Highway 1, and design of the structure, including use of dark colors, will ensure minimizing potential for visual intrusiveness as seen from Highway 1 (north and southbound traffic).

The project will result in short-term construction related impacts, such as disturbance of areas during the construction and are expected to be minimal in nature. Based on mitigation measures prescribed under Item 4 above (Biological Resources), including the design of the project, it is not expected to be in conflict with the County's Coastal Plan. (1-3, 5)

Mitigation Measures:
See Discussion Under Item 4 above (Biological Resources).

Mitigation Monitoring:
See discussion above under Item 4 (Biological Resources)

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. See Item 4.f. above. Habitat conservation plans and natural community conservation plans are site-specific plans to address effects on sensitive species of plants and animals. The project site is not located in an area subject to a habitat conservation plan or natural community conservation plan. (1-2)

Mitigation Measures: None required.

Mitigation Monitoring: N/A.

11. MINERAL RESOURCES: *Would the project:*

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. There are no known mineral resources on the project site. Therefore the Project would have no impact on mineral resources. (1-2, 5)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. The project site does not include any mineral resource recovery sites. (1)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

12. NOISE: *Would the project:*

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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. The project consists of a parking lot and scenic overlook trail with picnic tables. Visitors to the site can be expected to generate very low levels of noise. Additionally, due to the remoteness of the location and lack of any surrounding residential development, noise impacts from the use are not expected to result in a significant impact.

During construction, the project would generate construction related noise and vibration. However, this will be temporary and short-term in nature. Crews would be restricted to standard County hours for construction. The project is therefore not expected to generate noise impacts or violate any applicable noise standards. (3-4)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

b) Exposure of persona to or generation of excessive ground borne vibration or ground borne noise levels?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. The project includes construction activities that may generate ground borne vibration and noise resulting from use of excavators and trucks. These levels would not be significant because they would be short-term and temporary, and would be limited to daytime hours. There are no other activities or uses associated with the project that would expose persons to or generate excessive ground borne vibration or ground borne noise levels. (3-4)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. See 12.a. The project provides for visitor parking and use of a scenic overlook trail and picnic area. These low-impact recreational uses are not expected to generate substantial permanent noise in the project area above existing noise levels. (3-4)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. See item12.a, above. During construction, the project would generate construction related noise and vibration. Given the limited extent of the construction activities, this impact is expected to be less than significant. (3-4)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

expose people residing or working in the project area to excessive noise levels?				
Comment: **No Impact**. There are no public airports in the vicinity of the project site, and there are no aspects of the project construction or operation that would create a hazard for people living or working in the project area. The project area is not covered by an airport land use plan. (1, 5)				
Mitigation Measures: None required.				
Mitigation Monitoring: None required.				
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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X
Comment: **No Impact**. There are no private airstrips in the vicinity of the project site, and there are no aspects of the project construction or operation that would create a hazard for people living or working in the project area. (1, 5)				
Mitigation Measures: None required.				
Mitigation Monitoring: None required.				

13. POPULATION AND HOUSING: *Would the project*:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	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
Comment: **No Impact.** The project would not include construction of new homes or businesses. The proposed parking lot and scenic overlook trail use would not induce substantial population growth. (1)				
Mitigation Measures: None required.				
Mitigation Monitoring: None required.				
b) Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?				X
Comment: **No Impact.** No housing would be displaced by the project nor would any replacement housing be required. (1)				
Mitigation Measures: None required.				
Mitigation Monitoring: None required.				
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				x

Comment: **No Impact.** No people would be displaced by the project. (1, 5)
Mitigation Measures: None required.
Mitigation Monitoring: None required.

14. PUBLIC SERVICES: *Would the project:*

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
i. Fire protection?				X
ii. Police?				X
iii. Schools, parks, or other public facilities?				X
iv. Parks?				X
v. Other public facilities?				X

Comment:

No Impact. The proposed project would not result in adverse physical impacts associated with the provision of new or physically altered governmental facilities or result in the need to add new governmental facilities or public services. It would not induce growth or result in the need for other new facilities. Given the low-impact recreational nature of the use, the project is not anticipated to result in any significant need for expanded fire protection and police services or schools, or other public facilities. The project will expand recreational opportunities to the area and the Jenner Headlands Preserve through

construction of the parking lot and scenic overlook trail, consistent with Local Coastal Plan policies. (1-5)
Mitigation Measures: None required.
Mitigation Monitoring: None required.

15. RECREATION: *Would the project*:

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less Than Significant Impact. The project will expand recreational opportunities to the area and the Jenner Headlands Preserve through construction of the parking lot and scenic overlook trail, consistent with Local Coastal Plan policies, including:

LCP: 32. High Cliffs - Proposed Vista Point Discussion: South of the slide, turnout areas are provided on both sides of Highway 1. Recommendations: Designate as an official scenic vista point. Provide formal parking areas and develop interpretive facilities. Erect road signs to notify the public about the visitor stop. Development Priority: Ill.

The project is therefore expected to provide a beneficial impact regarding provision of recreational facilities for area residents and travelers along Highway 1. (1-5)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. See discussion above, under item 15.a. The project provides for recreational facility construction. (1-5)

Mitigation Measures: None required.
Mitigation Monitoring: None required.

16. TRANSPORTATION / TRAFFIC: *Would the project*:

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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
		X		

Comment:

Less than Significant Impact. See discussion below under item 16.b.

The California Department of Transportation, (Caltrans) District 4, in letters provided to PRMD dated September 4 and 5, 2015, concurred with the project traffic study findings and has determined that no shoulder widening will be needed along Highway 1 as part of the project. Caltrans has requested the applicant provide an update to the site plan layout showing exiting details, including sight distance and profiles at Highway 1 by the project driveway, and including details on driveway turn details to support emergency vehicle access and large vehicle access. They also expressed concern over the driveway grade and ability to make safe vehicle turn movements, and the need for all curb ramps and sidewalks/crosswalks to meet ADA standards. Caltrans also seeks applicant fair-share contribution, financing and other details related to any mitigation measures which may affect Caltrans, and indicated that any work in the Caltrans right-of-way will require an encroachment permit.

The Caltrans comments are addressed in the below mitigation measure, making impacts to transportation plans and policies less than significant. (1-5, 25)

Mitigation Measures:

The applicant shall apply and obtain all required clearances and permits, including an encroachment permit from Caltrans District 4, for all work to be conducted within Highway 1 and associated right-of-way. This shall include compliance with Caltrans comments regarding access design by the project driveway and provision of an updated site plan showing exiting details, sight

distance and Highway 1 profiles.

Mitigation Monitoring:

The applicant shall provide a copy to the Project Planner of the encroachment permit issued by Caltrans and Caltrans approval of the final driveway site plan details prior to work commencing within Highway 1 and associated right-of-way.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
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	

Comment:

Less than Significant Impact. The project consists of a 30-space public parking lot, plus spaces for 2 buses and bicycle parking. The use itself is not expected to generate traffic demand, but will attract Highway 1 travelers who otherwise would have very limited access to the project site and the Jenner Headlands Preserve in this immediate area.

The applicant prepared a traffic analysis of the project (Whitlock & Weinberger Transportation, Inc., April 2014). The study evaluated existing traffic conditions in the project area, collision history, project traffic volumes, and projected future traffic conditions. Highway 1 currently carries approximately 3,450 vehicles per day in a peak month, and 370 vehicles during a peak hour, with speeds along Highway 1 in the vicinity of the project driveway approximately 55 mph. The proposed parking lot and trail use is expected to generate an average of 9 weekday pm peak hour trips, and 16 Saturday midday peak hour trips, though more conservative (higher) numbers were used for the traffic impact analysis. The existing driveway configuration is expected to accommodate traffic demand volumes, and sight distances along Highway 1 were considered good for vehicle turn movements. Turn lanes into and out of the project driveway were not considered necessary.

The project would not conflict with an applicable congestion management program or level of service standards. (1-5, 25)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

c) Result in change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. The project is not located in proximity to a public or private airport or airstrip. Construction and operation of the parking lot and scenic overlook trail would have no impact to or cause change upon air traffic patterns. (1, 5)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. The project would utilize the existing driveway encroachment onto Highway 1 located at the north end of the project site. The project traffic study evaluated project traffic demands, sight distances and turn movement requirements, and concluded that no turn lanes into or out of the project site are necessary to safely support the proposed use. Caltrans has reviewed the proposed proposal and preliminary design plans. (1-5, 25)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

e) Result in inadequate emergency access?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. The project design includes vehicle turnaround areas, providing for emergency vehicle access to the site. (3, 5)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

No Impact. The project includes placement of bicycle parking racks by the parking lot, supporting recreational bicycle touring needs along Highway 1.The project would not conflict with any adopted plans for transit or bicycles. (2-3)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

17. UTILITIES AND SERVICE SYSTEMS: *Would the project*:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. The project includes the use of a waterless bathroom facility. Wastes from the bathroom would be pumped to a truck and removed from the site. Therefore the project would have no significant effect on wastewater generation or treatment requirements or capacity. (3)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

Less than Significant Impact. The project consists of installation of a waterless bathroom facility that would utilize a pumper truck to remove wastes. There would be no source of use of water at the project site. The project therefore would have no effect on wastewater generation or treatment requirements, or water supply facilities or capacity. (3)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

c) Require or result in the construction of new storm water drainage	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No impact

facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		Incorporation		
			X	

Comment:

Less than Significant Impact. The County adopted grading ordinances and standards and related conditions of approval that enforce them are specific, and also require compliance with all standards and regulations adopted by the State and Regional Water Quality Control Board, such as the Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, Low Impact Development (LID) and any other adopted best management practices.

The project was reviewed by the Sonoma County PRMD Storm Water and Grading Section and a condition of approval requires that grading and drainage improvement plans be reviewed and approved by PRMD prior to the issuance of any development permits.

Therefore, no significant adverse soil erosion or related soil erosion water quality impacts are expected given the mandated conditions and standards that need to be met. See further discussion of related issues (such as maintenance of required post construction water quality facilities) under Section 8, Hydrology and Water Quality. (3-4,18)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

Less than Significant Impact. The project does not include use of a water system or wells, and therefore would no effect on water supplies or water distribution systems. (3)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
				X

Comment:

No Impact. The project consists of installation of a waterless bathroom facility that would utilize a pumper truck to remove wastes. There would be no source of use of water at the project site. The project therefore would have no effect on wastewater treatment or capacities. (3)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. Project workers would generate small amounts of solid wastes during site construction, while visitors to the site also would be expected to generate only minor amounts of solid waste (trash and recyclable materials). These materials would be collected and taken to the County landfill. Sonoma County has access to adequate permitted landfill capacity to serve the proposed project. Therefore the project would have a minimal effect on solid waste facility capacity. (1)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

g) Comply with federal, state, and local statutes and regulations related to solid waste?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
			X	

Comment:

Less than Significant Impact. As described above, the project would generate minimal solid wastes. Sonoma County has access to adequate permitted landfill capacity to serve the proposed project. (1)

Mitigation Measures: None required.

Mitigation Monitoring: None required.

18. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	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		

Comment:

This Initial Study determined that the project would not result in degradation of the quality of the environment, substantially reduce the habitat of fish or wildlife species, threaten to eliminate a plant or animal community or eliminate important examples of the major periods of California history or prehistory. Mitigation measures related to project wetlands and special-status species are included. The Cultural Resource study prepared for the project found that all cultural or historical resources on the project site would be avoided by the project, as mitigated. Refer to item 4. (Biological Resources) and item 9. (Hydrology and Water Quality). The project would not have a significant impact after mitigation measures identified in this Initial Study are implemented. (1-5, 13-15, 18)

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				X

Comment:

The County has not identified any cumulative development in the vicinity of the proposed project that could result in impacts that would overlap those of the proposed project identified in this Initial Study. No substantial projects are proposed in the coastal areas of Sonoma Counties near the project site.

The proposed project's impacts would be limited to a brief construction period. Therefore, the project would not cause cumulatively considerable impacts in connection with the effects of past projects or the effects of other current projects. (1, 26)

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No impact
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Comment:

The project would not cause any potential substantial adverse effects on human beings. Building permits and grading permits are required to ensure the parking lot, trail and bathroom construction and installation meet all California Building Code requirements and the County Grading Ordinance requirements. (1, 3-5)

Sources

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4. *Project Planning, Description of Work, and Impact Avoidance Measures*, May 2015, Prunuske Chatham, Inc.

5. PRMD staff evaluation based on review of the project site and project description.

6. PRMD staff evaluation of impact based on past experience with construction projects.

7. *Summary of Jenner Headlands Public Access Project – Visual Analysis*, March 2014, Prunuske Chatham, Inc.

8. State of California, Important Farmlands Finder (http://maps.conservation.ca.gov/ciff/ciff.html - accessed January 27, 2016.

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