

# City Of Cloverdale

## General Plan Update

Final Environmental Impact Report

State Clearinghouse No. 2007082143



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Final Environmental Impact Report

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## **EXECUTIVE SUMMARY**

### **Introduction**

The California Environmental Quality Act (CEQA) requires that all state and local government agencies consider the environmental consequences of programs and projects over which they have discretionary authority before taking action on them. The primary purpose of this Final Environmental Impact Report (Final EIR) is to inform agencies and the public of any significant environmental effects associated with the City of Cloverdale General Plan Update (Proposed Project). The Final EIR consists of the Draft EIR and the responses to comments on the Draft. The Draft document was distributed on October 24, 2008.

The City of Cloverdale will be the CEQA lead agency for the Proposed Project and will consider the information presented in this Final EIR before taking discretionary action on the Proposed Project. Other agencies may use some or all of the analysis presented in this document for purposes of permit review and approval.

### **Project Description**

The proposed project is the update and adoption of the *City of Cloverdale General Plan* and the associated *Program Environmental Impact Report* prepared pursuant to the requirements of the California Environmental Quality Act. The City last updated the General Plan 1993, and since that time, the City has experienced population growth, residential and economic development, and changes in community interests and attitudes that are addressed in the updated General Plan. Additionally, the General Plan update addresses the pertinent planning, development, and environmental statutes that may have changed since the General Plan was last adopted. The overall purpose of the project is to adopt a Plan that will not only preserve, but enhance the quality of life for Cloverdale's residents. Ideally, the General Plan should serve as the community's overall implementation tool to achieve its vision for the future.

State law requires each county and city to prepare and adopt a comprehensive and long-range general plan for its physical development (Government Code Section 65300). The law specifically requires that the General Plan address seven topics or "elements." These are land use, circulation (transportation), housing, conservation, open space, noise, and safety. In addition, the City of Cloverdale's General Plan includes three optional elements -- Parkland and Recreation, Community Design, and Urban Lighting Elements.

## **Project Objectives**

The General Plan Citizen's Advisory Committee identified the following 14 major objectives for the General Plan.

### **Community Setting**

1. Maintain and encourage undeveloped hillsides, river and creek frontages, and forest setting that complement the natural visual setting of Cloverdale.
2. Maintain the urban forest by expanding the tree canopy within the City. Recommend preparation of a Tree Preservation Ordinance.
3. Maintain and improve the design of the built environment, including entrances and approaches to the community and downtown, site planning and development, highway frontages, and street and sidewalk design.
4. Minimize impacts of urban lighting.
5. Conserve or preserve historic buildings and the character of the older parts of town using conservation and form based zoning ordinances.

### **Maintain a balance of land uses**

1. The General Plan should provide for a balance of land uses for housing, jobs, economic development, destination commercial sites, and a jobs/housing balance.
2. Residential land use should have a target population of 12,000 people.
3. Downtown economic development continues to be important in the updated General Plan.
4. Industrial lands should be reserved for industrial purposes, and not for typical household retail items.

### **Geographical Growth**

1. The City should grow to the north or south if needed. There should be no expansion east of the Russian River, and expansion, if any, into hillside areas should be very low intensity, with controlled visibility and impacts.
2. The City may consider use of areas outside the urban service boundary and General Plan study area for recreation sites, even though they would not be considered for residential, commercial, or industrial use.
3. The City should adopt an Urban Growth Boundary.

### **Community Recreation**

1. Recreation assets should match population growth, including an evaluation of various groups who would like recreation assets such as youth, sports, walkers, elderly citizens, and land area and facilities targeted to those groups, including residential, commercial, and industrial areas.
2. Consider water-based recreation.

**TABLE: ES-1  
GENERAL PLAN UPDATE IMPACTS AND PROPOSED MITIGATION MEASURES**

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
<b>4.1 Land Use</b>			
<p><b>Impact 4.1.1</b> Implementation of the proposed General Plan Update may conflict with relevant land use planning documents within and adjacent to the City of Cloverdale.</p>	PS	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:            LU 1-1 (LU 1-1.a.): promotes land use density and intensity ranges to serve the community's needs ;            LU 1-5 (LU1-5.a.): provides for the development of guidelines to protect the hillsides within the County to the west of the City;            LU 2-1 (LU 2-1.a and b): supports the downtown as the core of the City;            LU 3-1 and 3-2 (LU 3-1a, LU 3-2a, b and c.): provide for development of an Urban Growth Boundary to protect important farmlands and hillsides from urban development;            LU 5-1 (LU 5-1.a, c and d.): provides for future school needs;            LU 8-1 (LU 8-1.a.): provides for airport compatible land uses near the airport:            NE 1-1 (NE 1-1.a, b, c and d.): provide for a quiet community by reducing existing noise problems and assuring that new development meets noise standards;            PS 7-1; PS 7-2; PS 7-3; PS 7-5; PS 7-6; PS 7-7; PS 7-12 Requires future development and use of the City Airport to be consistent with the Cloverdale Municipal Airport Master Plan. Sets policies for ensuring safety at the Airport and within the referral area.</p>	LS
<p><b>Impact 4.1.2</b> Implementation of the proposed General Plan may create conflicts between existing and future land uses within or adjacent to the City of Cloverdale General Plan Study Area.</p>	PS	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:            LU 1-1 (LU 1-1.a.): Allowable land uses are shown the General Plan Land Use Map with allowable population density and building intensity in the Land Use Table. Requires the Zoning Ordinance and other Ordinances to be amended to bring City Ordinances into conformity with the General Plan Map and Table;            LU 1-4 (LU 1-4.a; LU 1-4.c.) Provides for a balance of commercial and</p>	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
		<p>industrial lands and ensures buffers between industrial and residential uses;</p> <p>LU 1-5 (LU 1-5.a; LU 1-5.b.) The General Plan contains guidelines as a basis for comments to the County on projects within the Study Area. Requires development of a statement of preferred land use practices that would be sent to the county annually for county areas adjoining the City. Ensures adequate room for children play areas and resident needs;</p> <p>LU 2-1 (LU 2-1.a.) Provides for economic development resources to the downtown in order to maintain a focal point for the community. Requires maintenance of an up-to-date downtown plan, implementation of downtown plan policies and encouragement of cultural facilities and events in the downtown;</p> <p>LU 2-2 (LU 2-2.a.) Retains and encourages residential uses near the downtown to preserve a close-in customer and pedestrian base.</p> <p>LU 2-4 Discourages the creation of retail areas outside the downtown;</p> <p>LU 3-1 (LU 3-1.a.) Requires development of an Urban Growth Boundary (UGB) that allows urban development only within the boundaries with the areas outside the boundary to be retained as Conservation Features, except for the Industrial and Asti Exception areas;</p> <p>LU 6-2 (LU 6-2.a.) Requires provision of adequate public facilities and services to meet the needs of the community;</p> <p>LU 6-3, LU 6-3.a. Discourages development beyond areas with planned expansions of public services;</p> <p>LU 8-1 Requires future development and use of the City Airport to be consistent with the Cloverdale Municipal Airport Master Plan;</p>	
<p><b>Impact 4.1.3</b> Future development associated with build-out within the General Plan Update Study Area will place additional demands upon the amount of space required for use as open space, parks, and active and</p>	<p>PS</p>	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:</p> <p>PR 1-1 (PR 1-1.a.) Establishes an ad hoc parks and recreation committee to review existing and proposed park facilities;</p> <p>PR 1-2 (PR 1-2.a.) Provides for five acres of City-owned park and recreation land per 1,000 residents;</p> <p>PR 1-3 (PR 1-3.a.) Provides for potential acquisition of parklands</p>	<p>LS</p>

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
passive recreation areas.		through purchase, dedication or transfer from other agencies; PR 1-4 (PR 1-4.a.) Provides for hillside open areas and trails on sites shown in General Plan Exhibit 5.1.; PR 1-5 (PR 1-5.a, b.) Provision of pedestrian and bicycle trails with a gold of providing looped trail systems; PR 1-6 (PR 1-6.a.) Provides assistance to the Cloverdale Citrus Fair; PR 1-7 (PR 1-7.a, b.) Encourages participation with Sonoma County, the Cloverdale School District, other government agencies and private property owners to establish recreational facilities and uses;	
<b>4.2 Agriculture</b>			
<b>Impact 4.2.1</b> Implementation of the proposed General Plan would result in the loss of farmlands as designated under the Farmland Mapping and Monitoring Program, due to conversion to urban uses.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 3-1(LU 3-1.a, b and c) Develops an Urban Growth Boundary (UGB) outside of which no urban development would be permitted except in two existing developed areas (Industrial and Asti Exception areas). Retains land outside the UGB as conservation Features, except for the Industrial and Asti Exception Areas; LU 3-3 (LU 3-3. a, b) Provides for protection of hillsides, land outside the UGB and prime, unique and of statewide importance farmland from urban development, CDO 1-1 (CDO 1-1. a, b) Limits urban development to the valley floor. CDO 1-2 (CDO 1-2.a) Reserves the conservation areas north and south of the City for agricultural uses unless a Specific Plan is prepared and the General Plan is amended. CDO 1-5 (CDO 1-5.a) Encourages the County to retain surrounding lands in very low density residential, agricultural, open space and natural resource uses. Promotes the creation of a community separator.	LS
<b>Impact 4.2.2</b> Implementation of the proposed General Plan could result in the placement of urban uses adjacent to existing	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 3-1, (LU 3-1a, b and c.) Provides for an Urban Growth Boundary (UGB) outside of which no urban development would be permitted except in two existing developed areas (Industrial and Asti Exception areas). Retains land outside the UGB as conservation Features, except	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
agricultural uses.		for the Industrial and Asti Exception Areas LU 3-3 (LU 3-3. a, b.) Provides for protection of hillsides, land outside the UGB and prime, unique and of statewide importance farmland from urban development CDO 1-5 (CDO 1-5.a.) Encourages the County to retain surrounding lands in very low density residential, agricultural, open space and natural resource uses. Promotes the creation of a community separator	
<b>Impact 4.2.3</b> Implementation of the proposed General Plan could result in a conflict with existing Williamson Act contracts.	PS	LU 3-1(LU 3-1.a, b and c.) Provides for an Urban Growth Boundary (UGB) outside of which no urban development would be permitted except in two existing developed areas (Industrial and Asti Exception areas). Retains land outside the UGB as conservation Features, except for the Industrial and Asti Exception Areas CDO 1-5 (CDO 1-5.a.) Encourages the County to retain surrounding lands in very low density residential, agricultural, open space and natural resource uses. Promotes the creation of a community separator.	LS
<b>Impact 4.2.4</b> Implementation of the proposed General Plan, along with other proposed development in Sonoma County, would contribute to the additional conversion of Important Farmland to other uses.	PCC	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 3-1 (LU 3-1.a, b and c.) Provides for an Urban Growth Boundary (UGB) outside of which no urban development would be permitted except in two existing developed areas (Industrial and Asti Exception areas). Retains land outside the UGB as conservation Features, except for the Industrial and Asti Exception Areas LU 3-3 (LU 3-3. a, b.) Provides for protection of hillsides, land outside the UGB and prime, unique and of statewide importance farmland from urban development CDO 1-1 (CDO 1-1. a, b.) Limits urban development to the valley floor. CDO 1-5 (CDO 1-5.a.) Encourages the County to retain surrounding lands in very low density residential, agricultural, open space and natural resource uses. Promotes the creation of a community separator.	LTCC
<b>4.3 Population and Housing</b>			
<b>Impact 4.3.1</b> Implementation of the proposed General Plan Update	PS	Plan policies and implementation measures which avoid or substantially reduce this impact:	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
<p>would include land uses that would promote an increase in population, housing, and employment to the area.</p>		<p>LU 1-2 (LU 1-2.a.) Infrastructure and land use policies are based on a maximum anticipated population of 12,000 residents and 4,700 housing units in 2025. Calls for a Growth Management program to allow an average of 75 units per year, with flexibility so that growth does not exceed 375 units in any five year period.</p> <p>LU 1-5 (LU 1-5.a.) Requires development of a statement of preferred land use practices that would be sent to the county annually for county areas adjoining the City.</p> <p>LU 2-2 (LU 2-2.a.) Retains and encourages residential uses near the downtown to preserve a close-in customer and pedestrian base. Encourages mixed-use development downtown.</p> <p>LU 3-1 (LU 3-1.a.) Provides for an Urban Growth Boundary (UGB) outside of which no urban development would be permitted except in two existing developed areas (Industrial and Asti Exception areas).</p> <p>LU 3-2 (LU 3-2.a, b and c.) Any expansion into hillside areas must be consistent with the Conservation, Design and Open Space element. Requires development of a hillside ordinance and coordination with the County to assure that City hillside view policies are implemented in county approvals.</p> <p>LU 4-4 (LU 4-4.b.) Encourages elimination of blighted and visually undesirable conditions and provides for abatement.</p> <p>LU 6-1 (LU 6-1.a.) Ensures adequate water and wastewater capacities prior to granting entitlements for future development.</p> <p>LU 6-3 Discourages development beyond areas with planned expansions of sewer, water and road systems.</p> <p>CDO 1-1(CDO 1-1. a.) Limits urban development to the valley floor.</p> <p>CDO 1-2 (CDO 1-2.a.) Reserves the conservation areas north and south of the City for agricultural uses.</p> <p>CDO 1-3 (CDO 1-3.a.) Provides for land use designations outside of the Sphere of Influence to be used as guidelines for County review of projects.</p> <p>CDO 2-2 (CDO 2-2.a.) Provides for transfer of development rights where a parcel has land both below and above the base of hill to preserve the hillside areas as visual open space.</p> <p>CDO 2-3 (CDO 2-3.a.) Allows residential development above the base</p>	

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
		of hill in certain circumstances if a property currently in the City limits does not have lands below the base of hill. CDO 2-4 (CDO 2-4.a.) Discourages annexation of lands above the base of hill, except for lands described in Policy CDO 2-2 or where open space use is provided.	
<b>Impact 4.3.2</b> Implementation of the General Plan may result in the displacement of housing and/or persons due to the construction associated with new development or revitalization efforts.	LS	None required	LS
<b>Impact 4.3.3</b> Development as guided by the proposed project may result in a jobs-housing imbalance.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 1-2 (LU 1-2.a.) Infrastructure and land use policies are based on a maximum anticipated population of 12,000 residents and 4,700 housing units in 2025. Calls for a Growth Management program to allow an average of 75 units per year, with flexibility so that growth does not exceed 375 units in any five year period. LU 1-3 (LU 1-3.a.) Provides a jobs/housing balance by encouraging new business in the City, by encouraging housing production for local employees and by targeting a portion of City housing funds to provide housing for essential employees who live and work in the City. LU 7-1 (LU 7-1.a and b.) Requires amending the Housing Element to provide programs encouraging housing for farmworkers and local employees.	LS
<b>Impact 4.3.4</b> Buildout under the proposed General Plan, in conjunction with development in Sonoma and Mendocino Counties, would include substantial population, housing unit and	PCC	Plan policies and implementation measures which avoid or substantially reduce this impact: See Impacts 4.3.1 and 4.3.3	LTCC

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
employment increases.			
<b>4.4 Hazards and Human Health</b>			
<b>Impact 4.4.1</b> Implementation of the proposed General Plan Update may result in the potential to expose persons to known and unknown hazardous materials contamination in areas identified for development. Additionally, the development and activities anticipated in the General Plan Update may involve the routine transport, use, or disposal of hazardous materials, as well as the potential for accidents involving the release of hazardous materials.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: PS 4-1 Where allowed by law, regulate the transportation of hazardous materials to minimize the potential for damage Policy PS 6-1 (PS 6-1.a.) Provides for the regular update of the City's Multi-Hazard Emergency Plan. Policy PS 6-2 (PS 6-2.a.) Supports the County's Hazardous Waste Management Plan. Policy PS 6-3 (PS 6-3.a.) Utilizing State and County sources, maintains an inventory of sites with storage or use of significant quantities of hazardous materials. Policy PS 6-4 (PS 6-4.a.) Requires a use permit and management plan for any commercial or industrial use involving significant quantities of hazardous materials. Policy PS 6-5 (PS 6-5.a.) Tests the effectiveness of City emergency response procedures. Policy PS 6-6 (PS 6-6.a.) Requires periodic emergency response exercises.	LS
<b>Impact 4.4.2</b> Future development within the Study Area could impair implementation of the existing emergency response plan.	LS	None required	LS
<b>Impact 4.4.3</b> The City is located in proximity to wildlands, so the risk of wildland fires is high, especially in the residential hillside neighborhoods. Additionally, emergency vehicle access is constrained	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: PS 3-1 Continue to utilize available information of wildland and structural fire hazards. PS 3-2 Consider the severity of natural fire hazards, potential damage from wildland and structural fires, adequacy of fire protection and mitigation measures consistent with this element in the review of	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
by steep, winding, and narrow roads.		<p>projects.</p> <p>PS 3-3 Require on-site detection and suppression, including automatic sprinkler systems, where available services do not provide acceptable levels of protection.</p> <p>Policy PS 5-3 (PS 1-5) The City will require improvements to ensure emergency vehicle access as a condition of approval of proposed development.</p> <p>Policy PS 5-4 Develop and implement City programs for fuel breaks, brush management, controlled burning, revegetation, and construction and maintenance of fire roads.</p> <p>Policy PS 5-5 (PS 1-5) Incorporate and expand upon the fire safety standards recommended in CDF's "Fire Safety Guidelines" into City development standards and the Uniform Fire Code.</p> <p>Policy PS 5-6 (PS 1-5) Require that fire/police facilities and equipment are adequate for proposed development before granting approval.</p> <p>Policy PS 5-7 Require all new development in areas of potential fire hazards to provide for clearance around structures, the use of fire resistant ground cover materials, and require installation of automatic fire sprinklers.</p> <p>Policy PS 5-8 (PS 1-5) Prepare and implement a Policy/Fire Department Master Needs Assessment.</p> <p>Policy PS 5-11 Require development adjacent to hillside areas to minimize geologic and fire hazards. Require all new development, including single-family residential, to provide built-in fire protection (i.e. automatic fire sprinklers).</p>	
<b>Impact 4.4.5</b> Land use and in-fill development under the proposed General Plan would not result in cumulative hazardous materials and human health risks impacts.	LTCC	None Required	LTCC
<b>4.5 Transportation and Circulation</b>			

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
<p><b>Impact 4.5.1</b> It is projected that implementation of the proposed General Plan Update would necessitate improvements/modifications to the intersections of Cloverdale Boulevard/ South Interchange, US 101 Southbound Ramps/South Interchange, US 101 Northbound Ramps/ South Interchange and Asti Road/South Interchange in order to ensure adequate circulation movements.</p>	PS	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:  CE 1-1 (CE 1-1.a, b.) Requires that the City develop and maintain the Circulation Plan network of freeway/highways, arterials, collectors and local streets to serve the functions they are intended to serve with adequate capacity and safety.  Policy CE 1-2 (CE 1-2.a, b and c.) Directs that the City plan and reserve in advance of development, the street alignments and building setbacks necessary to handle anticipated future growth and traffic requirements.  Policy CE 2-1 (CE 2-1.a, b and c.) States that the City shall strive to maintain mid-level of Service (LOS, D operation during the weekday morning and evening peak periods at intersections of an arterial street with either another arterial or a collector street and intersections of the two collector streets. Requires that the City evaluate traffic impacts of major development and provide signalization and reconfigurations as needed to achieve the LOS D.</p>	LS
<b>4.6 Air Quality</b>			
<p><b>Impact 4.6.1</b> Project-related construction and development over the planning horizon of the GPU associated with vegetation removal, excavation, grading, paving, operation of vehicles, painting, and other construction activities may increase the potential for air pollutants, thereby affecting air quality.</p>	PS	Adherence to the NSCAPCD regulations	LS
<p><b>Impact 4.6.2</b> Negative air quality impacts associated with long-term emissions from projected growth over the planning</p>	PS	Adherence to the NSCAPCD regulations	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
horizon of the GPU may result in violations of ambient air quality standards or create significant nuisance impacts (e.g., wood smoke).			
<b>Impact 4.6.3</b> Negative air quality impacts associated with long-term emissions from projected growth over the planning horizon of the GPU may result in violations of ambient air quality standards or create significant nuisance impacts (e.g., wood smoke).	PCC	Adherence to the NSCAPCD regulations	LTCC
<b>4.7 Noise</b>			
<b>Impact 4.7.1</b> Implementation of the proposed General Plan would result in the adoption of the new goals, policies and implementation measures designed to address noise. This would be considered a <b>less than significant</b> impact.	LS	None Required	LS
<b>Impact 4.7.2</b> Future development of noise-sensitive land uses within areas which are	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: NE 1-1 (NE 1-1.a, b, and c.) All new development are required to be constructed to meet the adopted interior noise levels after a review of	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
<p>either currently impacted by noise or are in areas which may be impacted by noise in the future would result in <b>potentially significant</b> noise impacts under the proposed General Plan.</p>		<p>existing and potential future noise generation by allowable land uses and transportation corridors.  NE 1-2 (NE 1-2.a.) Establishes acceptable exterior noise levels to be met by new development, except school playgrounds during daytime use.  NE 1-4 (NE 1-4.a, NE 1-1.d.) Requires that noise from stationary sources such as music, machinery and pumps, shall be contained on the generating and receiving site at the property line. Required that multi-family, townhouse, mixed use and condominium projects shall use unit separation partitions and assemblies that guarantee interior noise levels  NE 1-6 (NE 1-6.b, c.) Requires the City to mitigate potential transportation noise, including high traffic streets and truck routes</p>	
<p><b>Impact 4.7.3</b> Future development of noise-producing land uses near noise-sensitive land uses would result in potentially significant noise impacts under the proposed General Plan.</p>	<p>PS</p>	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:  NE 1-1 (NE 1-1.a, b, and c.) All new development are required to be constructed to meet the adopted interior noise levels after a review of existing and potential future noise generation by allowable land uses and transportation corridors.  NE 1-2 (NE 1-2.a.) Establishes acceptable exterior noise levels to be met by new development, except school playgrounds during daytime use.  NE 1-4 (NE 1-4.a, NE 1-1.d.) Requires that noise from stationary sources such as music, machinery and pumps, shall be contained on the generating and receiving site at the property line. Required that multi-family, townhouse, mixed use and condominium projects shall use unit separation partitions and assemblies that guarantee interior noise levels.  NE 1-6 (NE 1-6.b, c.) Requires the City to mitigate potential transportation noise, including high traffic streets and truck routes.</p>	<p>LS</p>
<p><b>Impact 4.7.4</b> Implementation of the proposed General Plan would not result in significant increases in</p>	<p>LS</p>	<p>None Required</p>	<p>LS</p>

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
<p>traffic noise levels at existing noise-sensitive areas within Cloverdale. This is considered a <b>less than significant</b> impact.</p>			
<p><b>Impact 4.7.5</b> Implementation of the proposed General Plan may result in an increased number of individuals being exposed to aircraft noise at individual site locations. As the specific site designs and locations of future development are not currently known, it is conceivable that an increased number of receptors could be exposed to aircraft noise levels. As a result, this impact is considered to be <b>potentially significant</b>.</p>	<p>PS</p>	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:  NE 1-1 (NE 1-1.a, b, and c.) All new development are required to be constructed to meet the adopted interior noise levels after a review of existing and potential future noise generation by allowable land uses and transportation corridors.  NE 1-2 (NE 1-2.a.) Establishes acceptable exterior noise levels to be met by new development, except school playgrounds during daytime use.  NE 1-4.a. Requires adoption of noise standards.  PS 7-6 Discourages noise-sensitive development near the airstrip or under an overfly route.  PS 7-6.i. Discourages residential development beneath aircraft traffic pattern.  PS 7-6.j. Work with County and Airport Land Use Commission to ensure consistency in application of land use regulations within referral area.</p>	<p>LS</p>
<p><b>Impact 4.7.6</b> Implementation of the proposed General Plan in combination with regional growth and traffic conditions would increase traffic-related noise along area roadways. However,</p>	<p>LTCC</p>	<p>None Required</p>	<p>LTCC</p>

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
<p>because this increase would be less than the threshold of significance for the project, this impact is considered to be <b>less than cumulatively considerable</b>.</p>			
<p><b>Impact 4.7.7</b> Future operations on the NWP in the City of Cloverdale would introduce new noise exposure into the community. Development associated with the proposed General Plan could introduce noise-sensitive land uses into areas affected by future railroad noise. This could produce a <b>potentially cumulatively considerable</b> impact.</p>	PCC	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:  NE 1-1 (NE 1-1.a, b, and c.) All new development are required to be constructed to meet the adopted interior noise levels after a review of existing and potential future noise generation by allowable land uses and transportation corridors.  NE 1-2 (NE 1-2.a.) Establishes acceptable exterior noise levels to be met by new development, except school playgrounds during daytime use.  NE 1-4 (NE 1-4.a, NE 1-1.d.) Requires that noise from stationary sources such as music, machinery and pumps, shall be contained on the generating and receiving site at the property line. Required that multi-family, townhouse, mixed use and condominium projects shall use unit separation partitions and assemblies that guarantee interior noise levels.  NE 1-6 (NE 1-6.b, c) Requires the City to mitigate potential transportation noise, including high traffic streets and truck routes.</p>	LTCC
<p><b>Impact 4.7.8</b> Future, cumulative noise exposure at Cloverdale Municipal Airport is expected to <b>less than cumulatively significant</b>.</p>	LTCC	None Required	LTCC
<p><b>Impact 4.7.9</b> Implementation of the proposed General Plan would increase the number of</p>	PCC	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:  NE 1-1 (NE 1-1.a, b, and c.) All new development are required to be</p>	LTCC

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
<p>stationary noise sources in the Planning Area and the number of noise-sensitive uses in the vicinity of existing stationary noise sources. This is considered to be a <b>potentially cumulatively considerable</b> impact.</p>		<p>constructed to meet the adopted interior noise levels after a review of existing and potential future noise generation by allowable land uses and transportation corridors.  NE 1-2 (NE 1-2.a.) Establishes acceptable exterior noise levels to be met by new development, except school playgrounds during daytime use.  NE 1-4 (NE 1-4.a, NE 1-1.d.) Requires that noise from stationary sources such as music, machinery and pumps, shall be contained on the generating and receiving site at the property line. Required that multi-family, townhouse, mixed use and condominium projects shall use unit separation partitions and assemblies that guarantee interior noise levels.  NE 1-6 (NE 1-6.b, c.) Requires the City to mitigate potential transportation noise, including high traffic streets and truck routes.</p>	
<b>4.8 Geology and Soils</b>			
<p><b>Impact 4.8.1.</b> Construction of proposed improvements within areas delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist or in areas know to be directly above active faults could expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death due to fault surface rupture. However, as no Alquist-Priolo Earthquake Fault Zones are mapped within the project site, and our literature review did not suggest the presence of active faults, we consider this</p>	<p>NI</p>	<p>None Required</p>	<p>NI</p>

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
issue to have no impact on the GPU Study Area.			
<b>Impact 4.8.2</b> Construction of proposed improvements within the GPU Study Area could expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death due to strong seismic ground shaking.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: PS 1-1 (PS 1-5) Geologic reports shall be required for all new development and redevelopment projects in areas with identified geologic hazards. PS 1-2 (PS 1-5) Utilize studies of geologic hazards prepared during the development review process. PS 1-3 (PS 1-5) New development is required to incorporate sound soil conservation practices and keep land grading to a minimum. PS 1-4 (PS 1-5) Requires review of geologic reports prior to project approval. PS 1-5 (PS 1-5) Requires adoption of revisions to the building code which increase resistance of structures to geologic hazards. PS 1-6 (PS 1-5) Requires dynamic analysis of structural response to earthquake forces prior to approval of building permits. PS 1-7 (PS 1-5) Encourages strong enforcement of state seismic safety requirements for dams, power plants, hospitals and schools. PS 1-8 (PS 1-5) Measures to mitigate identified geologic hazards shall be incorporated into roads, public facilities and other public agency projects. PS 5-1 (PS 1-5) Supports the adoption of the County Safety Element into City policy. PS 5-9 (PS 1-5) Ensures that seismically unsafe buildings do not cause a serious threat to human safety. PS 5-10 (PS 1-5) Requires study of the risk of seismically-induced liquefaction.	LS
<b>Impact 4.8.3</b> Construction of proposed improvements within the GPU Study Area could expose people or structures to	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: PS 1-1 (PS 1-5 )Geologic reports shall be required for all new development and redevelopment projects in areas with identified	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
<p>potential substantial adverse effects, including the risk of loss, injury or death due to Seismic-related ground failure, including liquefaction.</p>		<p>geologic hazards.            PS 1-2 (PS 1-5) Utilize studies of geologic hazards prepared during the development review process.            PS 1-3 (PS 1-5) New development is required to incorporate sound soil conservation practices and keep land grading to a minimum.            PS 1-4 (PS 1-5) Requires review of geologic reports prior to project approval.            PS 1-5 (PS 1-5) Requires adoption of revisions to the building code which increase resistance of structures to geologic hazards.            PS 1-6 (PS 1-5) Requires dynamic analysis of structural response to earthquake forces prior to approval of building permits.            PS 1-7 (PS 1-5) Encourages strong enforcement of state seismic safety requirements for dams, power plants, hospitals and schools.            PS 1-8 (PS 1-5) Measures to mitigate identified geologic hazards shall be incorporated into roads, public facilities and other public agency projects.            PS 5-1 (PS 1-5) Supports the adoption of the County Safety Element into City policy.            PS 5-9 (PS 1-5) Ensures that seismically unsafe buildings do not cause a serious threat to human safety.            PS 5-10 (PS 1-5) Requires study of the risk of seismically-induced liquefaction.</p>	
<p><b>Impact 4.8.4</b> Construction of proposed improvements within the GPU Study Area could expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death due to landslides.</p>	<p>PS</p>	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:            PS 1-1 (PS 1-5 )Geologic reports shall be required for all new development and redevelopment projects in areas with identified geologic hazards.            PS 1-2 (PS 1-5) Utilize studies of geologic hazards prepared during the development review process.            PS 1-3 (PS 1-5) New development is required to incorporate sound soil conservation practices and keep land grading to a minimum.            PS 1-4 (PS 1-5) Requires review of geologic reports prior to project approval.            PS 1-5 (PS 1-5) Requires adoption of revisions to the building code</p>	<p>LS</p>

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
		<p>which increase resistance of structures to geologic hazards.</p> <p>PS 1-6 (PS 1-5) Requires dynamic analysis of structural response to earthquake forces prior to approval of building permits.</p> <p>PS 1-7 (PS 1-5) Encourages strong enforcement of state seismic safety requirements for dams, power plants, hospitals and schools.</p> <p>PS 1-8 (PS 1-5) Measures to mitigate identified geologic hazards shall be incorporated into roads, public facilities and other public agency projects.</p> <p>PS 5-1 (PS 1-5) Supports the adoption of the County Safety Element into City policy.</p> <p>PS 5-9 (PS 1-5) Ensures that seismically unsafe buildings do not cause a serious threat to human safety.</p> <p>PS 5-10 (PS 1-5) Requires study of the risk of seismically-induced liquefaction.</p>	
<p><b>Impact 4.8.5</b></p> <p>Development within the GPU Study Area could result in substantial soil erosion or the loss of topsoil.</p>	<p>PS</p>	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:</p> <p>PS 1-1 (PS 1-5 )Geologic reports shall be required for all new development and redevelopment projects in areas with identified geologic hazards.</p> <p>PS 1-2 (PS 1-5) Utilize studies of geologic hazards prepared during the development review process.</p> <p>PS 1-3 (PS 1-5) New development is required to incorporate sound soil conservation practices and keep land grading to a minimum.</p> <p>PS 1-4 (PS 1-5) Requires review of geologic reports prior to project approval.</p> <p>PS 1-5 (PS 1-5) Requires adoption of revisions to the building code which increase resistance of structures to geologic hazards.</p> <p>PS 1-6 (PS 1-5) Requires dynamic analysis of structural response to earthquake forces prior to approval of building permits.</p> <p>PS 1-7 (PS 1-5) Encourages strong enforcement of state seismic safety requirements for dams, power plants, hospitals and schools.</p> <p>PS 1-8 (PS 1-5) Measures to mitigate identified geologic hazards shall be incorporated into roads, public facilities and other public agency projects.</p>	<p>LS</p>

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
		PS 5-1 (PS 1-5) Supports the adoption of the County Safety Element into City policy. PS 5-9 (PS 1-5) Ensures that seismically unsafe buildings do not cause a serious threat to human safety. PS 5-10 (PS 1-5) Requires study of the risk of seismically-induced liquefaction.	
<b>Impact 4.8.6</b> Future development within some portions of the GPU Study Area could 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.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: PS 1-1 (PS 1-5) Geologic reports shall be required for all new development and redevelopment projects in areas with identified geologic hazards. PS 1-2 (PS 1-5) Utilize studies of geologic hazards prepared during the development review process. PS 1-3 (PS 1-5) New development is required to incorporate sound soil conservation practices and keep land grading to a minimum. PS 1-4 (PS 1-5) Requires review of geologic reports prior to project approval. PS 1-5 (PS 1-5) Requires adoption of revisions to the building code which increase resistance of structures to geologic hazards. PS 1-6 (PS 1-5) Requires dynamic analysis of structural response to earthquake forces prior to approval of building permits. PS 1-7 (PS 1-5) Encourages strong enforcement of state seismic safety requirements for dams, power plants, hospitals and schools. PS 1-8 (PS 1-5) Measures to mitigate identified geologic hazards shall be incorporated into roads, public facilities and other public agency projects. PS 5-1 (PS 1-5) Supports the adoption of the County Safety Element into City policy. PS 5-9 (PS 1-5) Ensures that seismically unsafe buildings do not cause a serious threat to human safety. PS 5-10 (PS 1-5) Requires study of the risk of seismically-induced liquefaction.	LS
<b>Impact 4.8.7</b> Certain development within the GPU Study Area could be	PS	Plan policies and implementation measures which avoid or substantially reduce this impact:	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
located on expansive soil, as defined by 2007 CBC, creating substantial risks to life or property.		<p>PS 1-1 (PS 1-5 )Geologic reports shall be required for all new development and redevelopment projects in areas with identified geologic hazards.</p> <p>PS 1-2 (PS 1-5) Utilize studies of geologic hazards prepared during the development review process.</p> <p>PS 1-3 (PS 1-5) New development is required to incorporate sound soil conservation practices and keep land grading to a minimum.</p> <p>PS 1-4 (PS 1-5) Requires review of geologic reports prior to project approval.</p> <p>PS 1-5 (PS 1-5) Requires adoption of revisions to the building code which increase resistance of structures to geologic hazards.</p> <p>PS 1-6 (PS 1-5) Requires dynamic analysis of structural response to earthquake forces prior to approval of building permits.</p> <p>PS 1-7 (PS 1-5) Encourages strong enforcement of state seismic safety requirements for dams, power plants, hospitals and schools.</p> <p>PS 1-8 (PS 1-5) Measures to mitigate identified geologic hazards shall be incorporated into roads, public facilities and other public agency projects.</p> <p>PS 5-1 (PS 1-5) Supports the adoption of the County Safety Element into City policy.</p> <p>PS 5-9 (PS 1-5) Ensures that seismically unsafe buildings do not cause a serious threat to human safety.</p> <p>PS 5-10 (PS 1-5) Requires study of the risk of seismically-induced liquefaction.</p>	
<b>Impact 4.8.8</b> Some portions within the GPU Study Area may have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	NI	None Required	NI

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
<b>Impact 4.8.9</b> Development within the GPU Study Area will not 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.	NI	None Required	NI
<b>Impact 4.8.10</b> Certain developments within the GPU Study Area could 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.	LS	None Required	LS
<b>4.9 Hydrology and Water Quality</b>			
<b>Impact 4.9.1</b> Project-related vegetation removal, excavation, grading, and other construction activities involving soil disturbance may increase the potential for erosion and sedimentation, thereby affecting water quality.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 3.2 (LU 3-2. a. and b) Requires adoption of a Hillside Ordinance. All development must conform to Urban Growth Boundary requirements. CDO 7-1 (CDO 7-1.a, b and c.) Ensures drainage and runoff is not impairing the water quality of the Russian River. Requires buffers on each side from creeks and rivers.	LS
<b>Impact 4.9.2</b> New development within the proposed Study Area would introduce sediments and constituent pollutants typically associated with urban development into storm water	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: CDO 7-1 (CDO 7-1.a, b and c.) Ensures drainage and runoff is not impairing the water quality of the Russian River. Requires buffers on each side from creeks and rivers. PS 2-3. Requires preparation of an analysis of potential flood hazards	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
runoff, thereby degrading downstream storm water quality.		and drainage impacts associated with adopted land use plans for each major watershed in the City. PS 2-4. Requires project applicants to analyze and mitigate drainage impacts.	
<b>Impact 4.9.3</b> Implementation of the proposed General Plan Update could result in the degradation of groundwater quality resulting from future land uses.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 6-1, (LU 6-1.a and b) Ensures adequate water and wastewater capacities or improvements are in place prior to granting approvals for new development. PS 6-2 (PS 6-2.a) The County's Hazardous Waste Management Plan is to be incorporated into City policies. PS 6-3 (PS 6-3.a) Inventory of sites with storage or use of hazardous materials. PS 6-4 (PS 6-4a and 1-5) Use permits will be required for uses involving significant amounts of hazardous materials. Studies from project developers will be required to ensure that major new development does not adversely affect groundwater quality.	LS
<b>Impact 4.9.4</b> Implementation of the proposed General Plan would increase demand for water, potentially requiring localized increases in groundwater production.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 1-2, (LU 1-2a) Development of Growth Management Plan. LU 6-1 (LU 6-1.a, b, c and d) Ensures adequate water and wastewater capacities or improvements prior to granting approval for new development. LU 6-4 (LU 6-4.a) Requires new development to fund processing costs and necessary infrastructure and service improvements.	LS
<b>Impact 4.9.5</b> Implementation of the General Plan Update could expose development to potential flooding.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: PS 2-1. Requires coordination with the Army Corps of Engineers, FEMA and other responsible agencies for flood hazard analysis and management activities. PS 2-3. Requires comprehensive analysis of the potential flood hazards and drainage impacts associated with adopted land use plans for each	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
		<p>major watershed in the City.</p> <p>PS 2-4. Project sponsors must analyze and mitigate drainage impacts and flood hazards for individual projects.</p> <p>PS 2-5. Provides ways to deal with cumulative impacts to downstream flooding.</p> <p>PS 2-6. Provides for use of 100 year flood event as the City measure of acceptable level of risk.</p> <p>PS 2-7. Onsite and offsite flood related hazards are to be reviewed for all projects located within areas of known flood hazards.</p> <p>PS 2-8. Minimizes increase in flooding and related damage.</p> <p>PS 2-9. Development shall pay the costs for drainage facilities to handle the surface runoff from new development.</p> <p>PS 2-10. Design and construction of drainage facilities are subject to review and approval of the Sonoma County Water Agency.</p> <p>PS 2-11. Tentative and final subdivision maps are required to show areas subject to flooding.</p> <p>PS 2-12. Priority is given to floodplain management over flood control structures.</p> <p>PS 2-13. Project review includes risk of damage from flooding.</p> <p>PS 2-14. Enforce City code requirements on construction in flood hazard areas.</p> <p>PS 2-15. Avoid variances to building setbacks along streams and in 100 year flood plains without the review and approval of the Sonoma County Water Agency.</p> <p>PS 2-16. Limits filling in areas which could retain significant amount of floodwater.</p> <p>PS 2-17. Encourages timely completion and filing of inundation maps for all dams within Sonoma County.</p> <p>PS 5-1. Supports the adoption of the County Safety Element into City policy.</p>	
<b>4.10 Biological Resources</b>			

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
<p>Impact 4.10.1: Land uses and development consistent with the Draft General Plan Update could result in the loss of populations or essential habitat for special-status plant and animal species.</p>	PS	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:  CDO 5-1 (CDO 5-1.a.) Considers dedicating a portion of lands adjacent to the Russian River to restore native grassland habitat for raptors.  CDO 6-2. Provides for preservation of natural vegetation.  CDO 7-1 (CDO 7-1.a.) Conserves and protects the area’s natural vegetation.  CDO 7-2 (CDO 7-2.b, c and d.) Conserves and protects the area’s natural wildlife.</p>	LS
<p>Impact 4.10.2: Land uses and development consistent with the Draft General Plan Update could result in the loss of riparian habitat or other sensitive natural communities.</p>	PS	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:  CDO 5-1 (CDO 5-1.a.) Considers dedicating a portion of lands adjacent to the Russian River to restore native grassland habitat for raptors.  CDO 6-1 (CDO 6-1.a.) Maintains and expands the tree canopy. Requires tree protection measures and an urban forest plan.  CDO 6-2 Provides for preservation of natural vegetation.  CDO 6-3 Encourages retention of large or otherwise significant trees in residential, non-residential and open space areas.  CDO 7-1 (CDO 7-1.d.) Conserves and protects the area’s natural vegetation.  CDO 7-2 Conserves and protects the area’s natural wildlife.</p>	LS
<p>Impact 4.10.3: Land uses and development consistent with the Draft General Plan Update could result in the loss of jurisdictional waters of the U.S, including wetlands.</p>	PS	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:  CDO 5-1 (CDO 5-1.a.) Considers dedicating a portion of lands adjacent to the Russian River to restore native grassland habitat for raptors.  CDO 6-1 (CDO 6-1.a.) Maintains and expands the tree canopy. Requires tree protection measures and an urban forest plan.  CDO 6-2 Provides for preservation of natural vegetation.</p>	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
		<p>CDO 6-3 Encourages retention of large or otherwise significant trees in residential, non-residential and open space areas.</p> <p>CDO 7-1 (CDO 7-1.d.) Conserves and protects the area’s natural vegetation.</p> <p>CDO 7-2 Conserves and protects the area’s natural wildlife.</p>	
<p>Impact 4.10-4: Land uses and development consistent with the Draft General Plan Update could restrict aquatic or terrestrial wildlife movement through travel corridors. This would be considered a significant impact.</p>	<p>PS</p>	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:</p> <p>CDO 5-1 (CDO 5-1.a.) Considers dedicating a portion of lands adjacent to the Russian River to restore native grassland habitat for raptors.</p> <p>CDO 6-1 (CDO 6-1.a.) Maintains and expands the tree canopy. Requires tree protection measures and an urban forest plan.</p> <p>CDO 6-2 Provides for preservation of natural vegetation.</p> <p>CDO 6-3 Encourages retention of large or otherwise significant trees in residential, non-residential and open space areas.</p> <p>CDO 7-1 (CDO 7-1.d.) Conserves and protects the area’s natural vegetation.</p> <p>CDO 7-2 Conserves and protects the area’s natural wildlife.</p>	<p>LS</p>
<p>Impact 4.10.5: Proposed policies in the Draft General Plan Update that affect biological resources may differ from local policies and ordinances currently in effect. However, potential conflicts would be addressed by the revisions of the implementing ordinances to ensure that they conform to the proposed policies.</p>	<p>LS</p>	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:</p> <p>CDO 5-1 (CDO 5-1.a.) Considers dedicating a portion of lands adjacent to the Russian River to restore native grassland habitat for raptors.</p> <p>CDO 6-1 (CDO 6-1.a.) Maintains and expands the tree canopy. Requires tree protection measures and an urban forest plan.</p> <p>CDO 6-2 Provides for preservation of natural vegetation.</p> <p>CDO 6-3 Encourages retention of large or otherwise significant trees in residential, non-residential and open space areas.</p> <p>CDO 7-1 (CDO 7-1.d.) Conserves and protects the area’s natural vegetation.</p> <p>CDO 7-2 Conserves and protects the area’s natural wildlife.</p>	<p>LS</p>

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
Impact 4.10-6: Land uses and development consistent with the Draft General Plan Update would not conflict with any adopted Habitat or Natural Community Conservation Plans.	LS	None Required	LS
<b>Impact 4.10.7</b> The proposed project, in combination with other reasonably foreseeable projects, would result in direct mortality and loss of habitat for special-status species, and waters of the U.S., including wetlands.	PCC	Plan policies and implementation measures which avoid or substantially reduce this impact: CDO 5-1 (CDO 5-1.a.) Considers dedicating a portion of lands adjacent to the Russian River to restore native grassland habitat for raptors. CDO 6-1 (CDO 6-1.a.) Maintains and expands the tree canopy. Requires tree protection measures and an urban forest plan. CDO 6-2 Provides for preservation of natural vegetation. CDO 6-3 Encourages retention of large or otherwise significant trees in residential, non-residential and open space areas. CDO 7-1 (CDO 7-1.d.) Conserves and protects the area's natural vegetation. CDO 7-2 Conserves and protects the area's natural wildlife.	LTCC
<b>4.11 Cultural and Paleontological Resources</b>			
<b>Impact 4.11.1</b> Adoption of the City of Cloverdale General Plan Update could result in the potential disturbance of cultural resources (i.e., prehistoric sites, historic sites, and isolated artifacts) and human remains. This impact is considered	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 3-4 (LU 3-4.b.) Conserves/preserves historic buildings and the character of the older parts of town using conservation and form based zoning ordinances. CDO 3-5 (CDO 3-5.a.) Preserves the traditional appearance of the downtown by identifying and allowing flexibility in planning standards for structures built prior to 1939. CDO 4-1 (CDO 4-1.a and b.) Measures for conserving/preserving	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
<b>potentially significant.</b>		historic buildings and the character of the older parts of town. CDO 4-2 (CDO 4-2.a and b.) Discusses preservation of remaining prehistoric camps, villages and use sites. CDO 4-3 (CDO 4-3.a, b and c.) Identification of historically significant structures or groups of structures for educational purposes. Requires the development of standard conditions of approval for CEQA and project review for preservation of paleontological resources. CDO 4-4. Preserves paleontological resources.	
<b>Impact 4.11.2</b> Adoption of the City of Cloverdale General Plan Update, including the “no project alternative, or Alternative 1 or 2, could result in the potential disturbance of paleontological resources (i.e., fossils and fossil formations).	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: CDO 4-3.a. Requires the development of standard conditions of approval for CEQA and project review for preservation of paleontological resources. CDO 4-4. Preserves paleontological resources.	LS
<b>Impact 4.11.3</b> Adoption of the City of Cloverdale General Plan Update, including the “no project” alternative, or Alternative 1 or 2, in addition to existing, approved, proposed and foreseeable development in the City of Cloverdale and Sonoma County could result in cumulative impacts to prehistoric and historic resources, and human remains in the region.	PCC	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 3-4 (LU 3-4.b.) Conserves/preserves historic buildings and the character of the older parts of town using conservation and form based zoning ordinances. CDO 3-5 (CDO 3-5.a.) Preserves the traditional appearance of the downtown by identifying and allowing flexibility in planning standards for structures built prior to 1939. CDO 4-1 (CDO 4-1.a and b.) Measures for conserving/preserving historic buildings and the character of the older parts of town. CDO 4-2 (CDO 4-2.a and b.) Discusses preservation of remaining prehistoric camps, villages and use sites. CDO 4-3 (CDO 4-3.a, b and c.) Identification of historically significant structures or groups of structures for educational purposes. Requires the development of standard conditions of approval for CEQA and project review for preservation of paleontological resources.	LTCC

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
		CDO 4-4. Preserves paleontological resources.	
<b>Impact 4.11.4</b> Adoption of the City of Cloverdale General Plan Update, including the “no project” alternative, or Alternative 1 or 2, in addition to existing, approved, proposed and foreseeable development in the City of Cloverdale and Sonoma County could result in cumulative impacts to paleontological resources in the region.	PCC	Plan policies and implementation measures which avoid or substantially reduce this impact: CDO 4-4. Preserves paleontological resources.	LTCC
<b>4.12 Public Services and Utilities</b>			
<b>Impact 4.12.1</b> Implementation of the proposed General Plan could increase the demand for fire protection.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: PS 3-1 (PS 1-5) Utilize available information on wildland and structural fire hazards. PS 3-2 Consider fire hazards and adequacy of fire protection in the review of projects. PS 3-3 Requires on-site detection and suppression where available services do not provide acceptable levels of protection. PS 4-1 Regulate the transport of hazards materials to minimize the potential for damage. PS 5-1 Supports the adoption of the County Safety Element into City policy. PS 5-2 (PS 1-5) Adopt revisions to the Fire and Building Codes. PS 5-3 (PS 1-5) Ensure adequacy of roadways for emergency vehicle access. PS 5-4 Develop City programs for fire roads.	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
		PS 5-5 (PS 1-5) Incorporate CDF's Fire Safety Guidelines into City standards. PS 5-6 (PS 1-5) <b>Addresses</b> adequacy of fire/police facilities and equipment. PS 5-7 Requires a police/fire department master needs assessment. PS 5-9 Addresses seismically unsafe buildings. PS 5-11 Minimize geologic and fire hazards; new development required to provide built-in fire protection.	
<b>Impact 4.12.2</b> Implementation of the proposed General Plan Update could result in an increased demand for law enforcement services.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 6-2 (LU 6-2.a.) Requires infrastructure audits if development exceeds 200 units per year. LU 6-4 (LU 6-4.a.) New development will fund processing costs and necessary infrastructure or services.	LS
<b>Impact 4.12.3</b> Land uses and development under the proposed City of Cloverdale General Plan Update would increase population and subsequent student enrollment in the district's schools and may require new or expanded school facilities to serve the increased demand.	LS	None Required	LS
<b>Impact 4.12.4</b> Land uses and development under the proposed City of Cloverdale General Plan Update would increase the demand for emergency services in the Study Area.	LS	None Required	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
<b>Impact 4.12.5</b> Implementation of the proposed General Plan Update could increase population and increase the demand for solid waste disposal facilities. This is a potentially significant impact.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 9-1 (LU 9-1.a, b.) Maintains waste management contracts and participation in countywide waste disposal facilities.	LS
<b>Impact 4.12.6</b> Implementation of the proposed General Plan Update could increase population and subsequently increase the demand for park and recreation related services.	LS	None Required	LS
<b>Impact 4.12.7</b> Implementation of the proposed General Plan Update would increase the demand for electric, telephone, and natural gas services.	LS	None Required	LS
<b>Impact 4.12.8</b> Implementation of the proposed General Plan Update would increase the demand for wastewater collection and treatment.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 6-1 (LU 6-1.a) Ensures adequate water and wastewater capacities prior to project approvals. LU 6-2 (LU 6.2.a) Provides for adequate public facilities and service for community needs. LU 6-3 (LU 6-2.a.) Discourages development beyond areas with planned expansion of services. LU 6-4 (LU 6-4.a.) Requires new development to fund infrastructure improvements required by new development.	LS
<b>Impact 4.12.9.a</b> Implementation of the	LTCC	None Required	LTCC

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
proposed General Plan Update along with potential development in the surrounding area could contribute to the cumulative demand for fire protection and emergency medical services.			
<b>Impact 4.12.9.b</b> Implementation of the proposed General Plan Update along with potential development in the surrounding area could result in the increase of the demand for cumulative law enforcement services.	LTCC	None Required	LTCC
<b>Impact 4.12.9.c</b> Implementation of the proposed General Plan Update as well as potential development in the surrounding area could result in cumulative public school impacts.	LTCC	None Required	LTCC
<b>Impact 4.12.9.d</b> Implementation of the proposed General Plan Update along with potential development in the surrounding region would result in cumulative electric, telephone, and natural gas service impacts.	LTCC	None Required	LTCC

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
<b>Impact 4.12.9.e</b> Implementation of the proposed General Plan Update would result in cumulative wastewater impacts.	LTCC	None Required	LTCC
<b>Impact 4.12.9.f</b> Implementation of the proposed General Plan Update along with potential development in surrounding communities would result in cumulative solid waste impacts. This impact is considered <b>less than cumulatively considerable</b>	LTCC	None Required	LTCC
<b>4.13 Visual Resources and Aesthetics</b>			
<b>Impact 4.13.1</b> Implementation of the proposed General Plan Update could result in the alteration of scenic resources.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 1-5 (LU 1-5.a and b.) Provides for comments to the County on lands adjacent to the City limits. LU 3-1 (LU 3-1.a.) Provides for development of an Urban Growth Boundary. LU 3-2, (LU 3-2.a, b and c.) Requires expansion into hillside areas to eliminate or minimize visual, access or lighting impacts. LU 3-3 (LU 3-3.a.) Provides for expansion of tree canopy within and outside the developed areas of the City. LU 4-3 (LU 4-3.a.) Strives to improve the appearance of formula or chain businesses. CDO 1-1 (CDO 1-1.a.) Limits development to the valley floor. CDO 2-1 (CDO 2-1.a.) Adoption of a hillside ordinance. CDO 2-2 (CDO 2-2.a.) Allows for transfer of development rights to below the base of hill. CDO 2-3 (CDO 2-3.a.) Allows development above base of hill in	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
		certain circumstances. CDO 2-5 (CDO 2-5.a.) Requires roads serving hillside development to follow natural contours. CDO 3-2 (CDO 3-2.a.) Addresses pedestrian oriented downtown. CDO 3-4 (CDO 3-4.a.) Preservation of traditional appearance of existing houses along Cloverdale Boulevard north of downtown. CDO 3-5 (CDO 3-5.a.) Preservation of residential areas around the downtown. CDO 3-6 (CDO 3-6.a.) Requires new single family development to resemble past representative development. CDO 3-7 (CDO 3-7.a.) Provides for upgrading the appearance of Cloverdale Boulevard. CDO 3-8 (CDO 3-8.a.) Provides for transit oriented development around the rail station. CDO 3-10 (CDO 3-10.a.) Provides for street trees and landscaping along major streets. CDO 3-11 (CDO 3-11.a.) Provides for elimination of sign blight. CDO 3-12 (CDO 3-12.a.) Allows drive-through restaurants only in the South Interchange area. CDO 3-13 (CDO 3-13.a.) Provides for elimination of overhead utility lines. CDO 5-1 (CDO 5-1.a.) Consideration of dedication of lands adjacent to the Russian River for native grassland habitat for raptors. CDO 6-1 (CDO 6-1.a.) Expansion of tree canopy; preparation of tree preservation ordinance. CDO 6-3 (CDO 6-1.a.) Addresses preservation of trees. CDO 6-4 (CDO 6-1.a. and 6-4.b.) Provision of trees for shade in new development. CDO 6-5 (CDO 6-5.a.) Provides for street trees. CDO 6-6 (CDO 6-5.a.) Requires preparation of a street tree plan.	
<b>Impact 4.13.2</b> Implementation of the proposed General Plan Update could result in the alteration of	LS	None Required	LS

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
visual character.			
<b>Impact 4.13.3</b> Implementation of the proposed General Plan could result in an increase of daytime glare and/or nighttime lighting. The potential increases in daytime glare sources and nighttime lighting levels could have an adverse affect on adjacent areas and land uses relative to scenic resources and visual character.	PS	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 3-5 (LU 3-5.a.) Strives to minimize the impacts of urban lighting. UL 1-1 (UL 1-1.a, b and c.) Requires new development to provide minimum lighting levels necessary for safety. UL 1-2 (UL 1-1.a, b and c.) Limits light spillage off site. UL 1-3 (UL 1-1.a, b and c.) Reduces light glare from businesses at the south interchange. UL 1-4 (UL 1-1.a, b and c.) Eliminates excess lighting from signs. UL 1-5 (UL 1-1.b.) Revises street lighting with down lights. UL 1-6 (UL 1-1.a, b and c.) Allows for amortization program for high intensity lighting and signs. UL 1-7 (UL 1-1.a, b and c.) Disallows use of reflective building materials.	LS
<b>Impact 4.13.4</b> Implementation of the proposed General Plan would not result in the significant conversion of the Study Area's undeveloped lands, visual resources, visual character, and/or Urban lighting characteristics.	LTCC	None Required	LTCC
<b>5.0 Cumulative Impacts - Green House Gas &amp; Climate Change</b>			
<b>Impact 5.22</b> Buildout of the proposed General Plan Update may result in a cumulative increase of greenhouse gas emissions, including CO2. Because technical and regulatory	S/CC	Plan policies and implementation measures which avoid or substantially reduce this impact: LU 1-1 c. Allow limited numbers of small lots or cluster housing within single-family areas in order to provide variety and affordable housing. LU 1-6. (LU 1-6.a and b.) Provides recreation to match the population. LU 2-2 (LU 2-2.a.) Retain existing and encourage new residential uses around the downtown to preserve a close-in customer and pedestrian	SU

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
<p>uncertainties related to State and national programs make it impossible to determine the precise extent and effect of any local increase in emissions from General Plan Buildout, the proposed project is considered to make a cumulatively considerable incremental contribution to this significant cumulative impact.</p>		<p>base.  LU 3-4 (LU 3-2.b.) Requires adoption of a Hillside Ordinance. All development must conform to Urban Growth Boundary requirements.  LU 7-1 (LU 7-1-.b.) Requires amending the Housing Element to provide programs encouraging housing for farmworkers and local employees.  CE 1-3 (CE 1-3.b.) Design street systems in residential areas to minimize through traffic and encourage bicycling and walking.  CE 2-2 (CE 2-2.a.) Creates a country road appearance for specific streets with narrow pavement, shade trees and protected bicycle and pedestrian ways.  CE 3-1 (CE 3-1.a, b and c) Provides an extensive network of pedestrian and bicycle pathways.  CE 3-2 (CE 3-2.a, b and c.) Provides for sidewalks.  3-3 (CE 3-3.a.) Provides for shade trees along pedestrian routes.  CE 4-1 (CE 4-1.a –d) Supports Passenger rail service.  CE 4-2 (CE 4-2.a.) Provides for plan to coordinate access to rail station  CE 4-3 (CE 4-3.a.) Supports local bus service.  CE 4-4. (CE 4-3.a.) Encourages ride sharing.  PR 1-2 (PR 1-2.a.) Addresses parkland needs.  PR 1-3 (PR 1-3.a.) Acquisition of parklands.  PR 1-4 (PR 1-4.a.) Provides for open space and trails on hillside areas above base of hill.  PR 1-5, PR 1-5.a and b.) Provides for looped trail systems.  CDO 3-8 (CDO 3.8.a.) Provides for transit oriented development around passenger rail station.  CDO 6-1 (CDO 6-1.a.) Expands the tree canopy.  CDO 6-2 Protects natural vegetation  CDO 6-3 Encourages retention of significant trees.  CDO 6-4 (CDO 6-4.b.) Provides for mix of trees for shade and cooling.  CDO 6-5 (CDO 6-5.a.) Provides for street trees.  CDO 6-6 Preparation of a street tree plan.  DO 6-7 Requires native landscaping.  CDO 8-1 (CDO 8-1.a.) Provides for energy efficiency in City operations.  CDO 8-2 (CDO 8-2.a and b.) encourages energy can resource</p>	

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
		<p>efficiency in private construction. CDO 8-3 (CDO 8-3.a.) Preparation of Climate Action Plan.</p>	
<p><b>Impact 5.23</b> Long-term cumulative impacts of global climate change may result in potential decrease in water supply, increase in air pollutants and increase in health hazards. Because technical and regulatory uncertainties related to State and national programs make it impossible to determine the precise extent and effect of any local increase in greenhouse gas emissions from General Plan Buildout on this impact, the proposed project is considered to make a cumulatively considerable incremental contribution to this significant cumulative impact.</p>	<p>S/CC</p>	<p>Plan policies and implementation measures which avoid or substantially reduce this impact:            LU 1-1 c. Allow limited numbers of small lots or cluster housing within single-family areas in order to provide variety and affordable housing.            LU 1-6. (LU 1-6.a., b.) Provides recreation to match the population.            LU 2-2 (LU 2-2.a.) Retain existing and encourage new residential uses around the downtown to preserve a close-in customer and pedestrian base.            LU 3-4 (LU 3-2.b.) Requires adoption of a Hillside Ordinance. All development must conform to Urban Growth Boundary requirements.            LU 7-1 (LU 7-1-.b.) Requires amending the Housing Element to provide programs encouraging housing for farmworkers and local employees.            CE 1-3 (CE 1-3.b) Design street systems in residential areas to minimize through traffic and encourage bicycling and walking.            CE 2-2 (CE 2-2.a) Creates a country road appearance for specific streets with narrow pavement, shade trees and protected bicycle and pedestrian ways.            CE 3-1 (CE 3-1.a, b and c) Provides an extensive network of pedestrian and bicycle pathways.            CE 3-2 (CE 3-2.a, b and c.) Provides for sidewalks.            3-3 (CE 3-3.a.) Provides for shade trees along pedestrian routes.            CE 4-1 (CE 4-1.a –d) Supports Passenger rail service.            CE 4-2 (CE 4-2.a.) Provides for plan to coordinate access to rail station            CE 4-3 (CE 4-3.a.) Supports local bus service.            CE 4-4. (CE 4-3.a.) Encourages ride sharing.            PR 1-2 (PR 1-2.a.) Addresses parkland needs.            PR 1-3 (PR 1-3.a.) Acquisition of parklands.            PR 1-4 (PR 1-4.a.) Provides for open space and trails on hillside areas above base of hill.            PR 1-5, PR 1-5.a and b.) Provides for looped trail systems.            CDO 3-8 (CDO 3.8.a.) Provides for transit oriented development around passenger rail station.</p>	<p>SU</p>

Impact	Significance without General Plan Policies/ Actions and/or Mitigation	Proposed General Plan Policies/Implementation Actions and Mitigation Measure	Resulting Level of Significance
		CDO 6-1 (CDO 6-1.a.) Expands the tree canopy. CDO 6-2 Protects natural vegetation CDO 6-3 Encourages retention of significant trees. CDO 6-4 (CDO 6-4.b.) Provides for mix of trees for shade and cooling. CDO 6-5 (CDO 6-5.a.) Provides for street trees. CDO 6-6 Preparation of a street tree plan. DO 6-7 Requires native landscaping. CDO 8-1 (CDO 8-1.a.) Provides for energy efficiency in City operations. CDO 8-2 (CDO 8-2.a and b.) encourages energy can resource efficiency in private construction. CDO 8-3 (CDO 8-3.a.) Preparation of Climate Action Plan.	

## **CHAPTER 1**

### **Introduction**

During the public review process for the City of Cloverdale General Plan Update Draft Environmental Impact Report (Draft EIR), the City received a number of written and oral comments from public agencies, organizations, and individuals related to this document. During the public review period for this document, the City held a public workshop on the Draft EIR and the updated General Plan document.

This Final EIR includes all comments made on the Draft EIR during public review of the Draft EIR and provides written responses to these comments. The required contents of a Final EIR and the certification process are described below. The information in this document will be presented to the City of Cloverdale Planning Commission and City Council for certification and will be used as part of their review, consideration, and approval of the General Plan Update project.

### **California Environmental Quality Act Compliance**

The Final EIR for the Proposed Project has been prepared in accordance with the Title 14, California Code of Regulations, Chapter 3, ("CEQA Guidelines" or "Guidelines") for implementation of CEQA. Specifically, Section 15132 of the Guidelines requires that a Final EIR consist of the following:

- The Draft EIR or a revision of the draft;
- Comments and recommendations received on the Draft EIR;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- The responses of the lead agency to significant environmental concerns raised in the review and consultation process; and
- Any other information added by the lead agency.

The Draft EIR for the Proposed Project was prepared in compliance with CEQA and the CEQA Guidelines. As described in the Guidelines, Section 15121(a), an EIR is a public information document that assesses the potential environmental effects of a proposed project, as well as identifies mitigation measures and alternatives to the project that could reduce or avoid adverse environmental impacts. CEQA Guidelines require that state and local government agencies consider the environmental consequences of projects over which they have discretionary authority.

Consequently, the EIR is an information document used in the planning and decision-making process. It is not the purpose of an EIR to recommend either approval or denial of a project. The procedures required by CEQA "... are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." (Public Resources Code Section 21002.)

As a general rule, “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” (*Ibid.*) However, in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof. ” (*Ibid.*)

The lead agency must “certify” the Final EIR. According to the CEQA Guidelines, “certification” consists of three separate steps. Prior to approving a project, the lead agency (in this case the City of Cloverdale) shall certify that: (1) the Final EIR has been completed in compliance with CEQA; (2) the Final EIR was presented to the decision-making body of the lead agency and the body has reviewed and considered the information contained in the Final EIR prior to approving the project; and (3) that the Final EIR reflects the lead agency’s independent judgment and analysis. (Guidelines, Section 15090(a); *see, also*, Public Resources Code Section 21082.1(c)(3).)

Under CEQA, a lead agency must make certain determinations before it can approve or carry out a project if the EIR reveals that the project will result in one or more significant environmental impacts. First, before approving a project for which a certified Final EIR has identified significant environmental effects, the lead agency must make one or more of the following written findings for each of the identified significant impacts, accompanied by a brief explanation of the rationale for each finding: include

- (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

(Guidelines Section 15091(a).)

Second, if there remain significant environmental effects even with the adoption of all feasible mitigation measures or project alternatives, the agency must adopt a “statement of overriding considerations” before it can proceed with the project. The statement of overriding considerations must be supported by substantial evidence in the record (Guidelines Sections 15092(b)(2)(B) and 15093). These overriding considerations include the economic, legal, social, technological, or other benefits of the proposed project. The lead agency must balance these potential benefits against the project’s unavoidable environmental effects when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the lead agency may consider the adverse environmental impacts to be “acceptable.” (Guidelines Section 15093(a).)

These benefits should be set forth in the statement of overriding considerations, and may be based on the Final EIR and/or other information in the record of proceedings. (Guidelines Section 15093(b).)

### **CEQA Final EIR Process**

The Draft EIR for the Proposed Project was submitted to the State Clearinghouse (SCH# 2007082143) and released for public and agency review pursuant to CEQA regulations. The public review and comment period for the Draft EIR closed on December 8, 2008. A notice of availability was circulated consistent with CEQA.

Upon additional review of the Proposed Project and the Final EIR, the City of Cloverdale Planning Commission, at a public hearing, will recommend to the City Council whether to certify the EIR and whether to approve or deny the project. The City Council will then review the Proposed Project, Final EIR, recommendations of the Planning Commission and Community Development Department staff, and public testimony to decide whether to certify the Final EIR and whether to approve or deny the project.

### **Organization of the Document**

This Final EIR comprises five chapters that meet the requirements of the CEQA Guidelines, as outlined above. The five chapters that make up this Final EIR are as follows:

- **“Executive Summary”** - provides a brief project description and presents a summary table of the Proposed Project’s environmental effects.
- **Chapter 1 - “Introduction”** provides a brief overview of the Proposed Project, environmental compliance activities conducted to date, and outlines the contents and organization of the Final EIR.
- **Chapter 2 - “Comments on the Draft EIR”** provides a list of commenting agencies, organizations, and individuals and copies of their oral and written comments (coded for reference).
- **Chapter 3 - “Response to Comments on the Draft EIR”** provides the lead agency responses to the comments identified in Chapter 2.
- **Chapter 4 - “Minor Changes and Edits to the Draft EIR”** includes corrections and/or additions to the Draft EIR text made since publication of the Draft EIR. These changes to the Draft EIR are indicated by revision marks (underline for new text and strikeout for deleted text).
- **Chapter 5 - “Report Preparation”** provides a list of the individuals involved in the preparation of the Final EIR. As noted in Guidelines Section 15132(a), , the Draft EIR for the Proposed Project makes up part of this Final EIR. A copy of the Draft EIR is on file at the City of Cloverdale Community Development Department located at 126 N.

Cloverdale Boulevard, Cloverdale, CA. A copy can also be viewed by visiting the City's web site at <http://www.cloverdale.net/resources.asp>.

## **CHAPTER 2**

### **Comments on the Draft EIR**

**Introduction** - This chapter provides a list of all oral and written comments received during the public review period.

#### **List of Comments Received**

The public agencies, organizations, and individuals that submitted comments on the Draft EIR are listed below in Table 2-1. As shown in the table, each comment has been designated by a specific letter and number that will be used to refer to particular comments and responses.

#### **Comment Letters**

Each of the comments identified above are provided on the following pages, with individual responses to each of the comments provided in Chapter 3 “Responses to Comments on the Draft EIR”. The content of each comment has been divided into individual comments. To assist in referencing comments and responses, each comment has been assigned a number and each individual topic within a comment has been assigned a corresponding number. The responses to each comment are formatted in a similar fashion.

Where changes to the Draft EIR text result from these responses to comments, those changes are presented in Chapter 4 “Minor Changes and Edits to the Draft EIR” of this document, with changes shown by underlining new text (e.g., new text) and striking out text to be deleted (e.g., deleted text). Comments which present opinions about the project unrelated to environmental issues or which raise issues not directly related either to the substance of the Draft EIR or to environmental issues are noted without a detailed response.

The comments on the Draft EIR, the responses thereto and the text changes to the Draft EIR do not raise any “significant new information” within the meaning of Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5; therefore, the City of Cloverdale, as the CEQA Lead Agency, directed that a Final EIR be prepared rather than recirculating the Draft EIR.

NOTE. ALL MNSRW COMMENTS ACCEPTED FOR CHAPTER 2  
**TABLE 2-1**  
**COMMENTS RECEIVED ON THE DRAFT EIR**

<b>Commenter</b>	<b>Date Received</b>	<b>Comment Code</b>
<b>Public Agencies</b>		
Department of Fish and Game	November 12, 2008	A1
Department of Transportation	December 8, 2008	A2
Sonoma LAFCO	November 20, 2008	A3
Sonoma Co. PRMD	January 9, 2009	A4
State RWQCB	December 8, 2008	A5
<b>Organizations</b>		
Citizens for a UGB	December 22, 2008	O1
Greenbelt Alliance	December 9, 2008	O2
<b>Individuals</b>		
Roz Katz	November 3, 2008	I1
James Wagele	December 8, 2008	I2
John Mackie, Esq., on behalf of Redwood Empire Sawmills	December 9, 2008	I3
Robert Sexton, on behalf of Tyris/Alexander Valley Resort	December 5, 2008	I4
John Doble	November 5, 2008	I5
Diane Bartleson	November 5, 2008	I6
Dick Schwartz	November 5, 2008	I7
Melanie Bagby	November 5, 2008	I8
Russ Peihl	November 5, 2008	I9



State of California – The Resources Agency  
 DEPARTMENT OF FISH AND GAME  
<http://www.dfg.ca.gov>

ARNOLD SCHWARZENEGGER, Governor

POST OFFICE BOX 47  
 YOUNTVILLE, CALIFORNIA 94599  
 (707) 944-5500

November 10, 2008



Mr. Bruce Kibby  
 City of Cloverdale  
 126 N. Cloverdale Boulevard  
 Cloverdale, CA 96425

Dear Mr. Kibby:

Subject: City of Cloverdale General Plan Update, SCH #2007082143, City of Cloverdale, Sonoma County

The Department of Fish and Game (DFG) has reviewed the Draft Environmental Impact Report (EIR) for the City of Cloverdale (City) General Plan Update. The draft EIR is a comprehensive, long-term planning document, detailing proposals from the physical development of the City, and of any land outside its boundaries which in the planning agency's judgment bears relation to its planning. The Cloverdale General Plan has a time horizon to the year 2025. The draft EIR represents a picture of what the City will look like in 2025 based on the draft EIR's goals and policies.

DFG is providing the following comments on the draft EIR as a trustee agency. As trustee for the State's fish and wildlife resources, DFG has jurisdiction over the conservation, protection, and management of the fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of such species for the benefit and use of the public of California.

Section 4.10. Biological Resources

The City should review future development projects to ensure that rare or sensitive species are not impacted. This should include a scoping phase to determine: 1) whether there are known occurrences of rare or sensitive species on or near project areas, and 2) whether the project will disturb habitats that may be occupied by unknown occurrences of rare or sensitive species.

Project scoping should include consultation of DFG's California Natural Diversity Database (CNDDDB) to identify known occurrences of rare or sensitive species on or near the project area. However, the City should recognize that a report from the CNDDDB which lists no findings for the project site does not indicate these species do not exist there, only that no information is in the file. Consequently, a negative result from a CNDDDB search must not be used to obviate the need for requisite surveys or appropriate mitigation. Therefore, DFG recommends that biological surveys for rare and sensitive species be conducted prior to approving projects in areas designated as Conservation Features or when project areas are in habitats that may be occupied by rare or sensitive species.

*Conserving California's Wildlife Since 1870*



Mr. Bruce Kibby  
November 10, 2008  
Page 2

Page 4.10-30. Policy CDO-6-2

DFG supports the City in protecting distinctive natural vegetation such as oak woodlands, riparian corridors, and mixed evergreen forests by maintaining the natural features as a whole, as opposed to protecting individual features (i.e., individual trees). DFG believes that managing habitat communities on a landscape and watershed scale rather than managing individual features can be more beneficial for fish and wildlife. However, the draft EIR does not appear to have any mitigation measures that would implement this policy. DFG recommends the City propose mitigation measures that when implemented would effectively carry out this policy.

Page 4.10-10. Implementation CDO 7-1.a

This mitigation measure would amend the zoning ordinance to provide a 100-foot buffer (i.e., 50 feet on each side) from creeks and rivers shown on the Conservation Element Map. DFG recommends the zoning ordinance be revised such that creeks and rivers outside the Conservation Element receive adequate buffers. In addition, DFG recommends the City consider extending the proposed setback to 100 feet on each side as measured from the top of bank.

DFG appreciates the opportunity to comment on the draft EIR. We remain available to be of further assistance with the City in finalizing their EIR. If there are any comments or questions regarding this letter, please contact Mr. Dan Wilson, Environmental Scientist, at (707) 944-5534; or Mr. Richard Fitzgerald, Coastal Habitat Conservation Supervisor, at (707) 944-5568.

Sincerely,



Charles Armor  
Regional Manager  
Bay Delta Region

cc: State Clearinghouse

**DEPARTMENT OF TRANSPORTATION**

111 GRAND AVENUE  
P. O. BOX 23660  
OAKLAND, CA 94623-0660  
PHONE (510) 286-5505  
FAX (510) 286-5559  
TTY 711



*Flex your power!  
Be energy efficient!*

December 8, 2008

SON000153  
SON-Gen  
SCH # 2007082143

Bruce Kibby  
City of Cloverdale  
126 N. Cloverdale Boulevard  
Cloverdale, CA 95425

Dear Mr. Kibby:

**City of Cloverdale General Plan Update – Draft Environmental Impact Report (DEIR)**

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review process for the proposed General Plan Update. Our comments below are based on the review of the DEIR. As lead agency, the City of Cloverdale is responsible for all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, and implementation responsibilities as well as lead agency monitoring should be fully discussed for all proposed mitigation measures and the project's traffic mitigation fees should be specifically identified in the DEIR. Any required roadway improvements should be completed prior to build out of the proposed plan. An encroachment permit is required when the project involves work in the State's right of way (ROW). The Department will not issue an encroachment permit until our concerns are adequately addressed. Further information regarding the encroachment permit process is provided at the end of this letter.

***Traffic Analysis***

1. The Cloverdale Rancheria of Pomo Indians is proposing a Casino, Hotel, Convention and Entertainment Center on a site within City boundaries and the City's sphere of influence. Regional access to the site would be provided by South Cloverdale Boulevard via US 101. This project should be included in the cumulative traffic analysis for this General Plan Update and in the evaluation of the feasibility and adequacy of the proposed transportation improvements.
2. Roundabouts are proposed at the Cloverdale Boulevard/South Interchange and US 101 Southbound Ramps/South Interchange as well as the US 101 Northbound Ramps/South Interchange and Asti Road/South Interchange to mitigate expected traffic congestion under Buildout Conditions. Please be sure to consult with the Department as early as possible to coordinate the preparation of a Concept Approval Report (CAR) required for roundabouts on the State Highway System. Provide us with initial layouts of the roundabouts (preliminary or schematic) so that we can start with our assessment of the performance of the proposed alternatives.

*"Caltrans improves mobility across California"*

Mr. Bruce Kibby/ City of Cloverdale

December 8, 2008

Page 2

3. If the alternative improvement of signalizing intersections # 14, 15, 16, and 17 will be pursued instead of roundabouts, close and early coordination with the Department will be required. | A2-3
4. Sonoma and Marin County voters recently approved rail transit (SMART) from Cloverdale to Larkspur. Of the 944 new development units listed in the General Plan, only 52 are transit-oriented units. Local and regional traffic impacts projected by the General Plan may be reduced by increasing the amount of development designed around the bus feeder lines and bike trails that will be serving the new passenger rail station. This could also alleviate traffic congestion at freeway interchanges and potentially reduce the need for mitigation. To maximize the benefits of SMART the City should, in conjunction with SMART and transit agencies, minimize auto trips generated by the future rail service. This is one way a smaller community, such as Cloverdale, can help the State meet its goal to reduce green house gas emissions as mandated by Assembly Bill 32. | A2-4
5. Please provide us with output sheets showing the results of the SIDRA and HCM analyses for intersections for our review. | A2-5

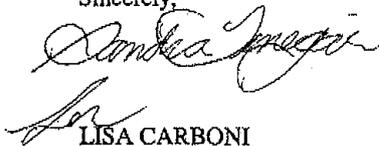
***Encroachment Permit***

Please be advised that any work or traffic control that encroaches on State ROW requires an encroachment permit issued by the Department. Further information is available on the following website: <http://www.dot.ca.gov/hq/traffops/developserv//permits/>. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the following address:

Julie Hsu, Branch, Office of Permits  
California DOT, District 4  
P.O. Box 23660  
Oakland, CA 94623-0660

Should you require further information or have any questions regarding this letter, please call Ina Gerhard of my staff at (510) 286-5737.

Sincerely,



LISA CARBONI  
District Branch  
Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse



LOCAL AGENCY FORMATION COMMISSION  
575 ADMINISTRATION DRIVE, ROOM 104A, SANTA ROSA, CA 95403  
(707) 565-2577 FAX (707) 565-3778  
www.sonoma-county.org/lafco

RECEIVED  
CITY OF CLOVERDALE  
2008 NOV 20 AM 11:09

November 14, 2008

Bruce Kibby  
Community Development Director  
City of Cloverdale  
P.O. Box 217  
Cloverdale, CA 95425

Dear Mr. Kibby:

Re: Draft General Plan Environmental Impact Report

We have reviewed the proposed General Plan and the draft General Plan Environmental Impact Report (DEIR) and have several comments. First, it is apparent that the City has spent considerable time, resources, and thought in preparing a well-organized, thorough draft General Plan and DEIR. Because you choose to have the General Plan self-mitigating, the EIR does not have as much information as one would normally expect. As we will use the General Plan EIR as the environmental document for any sphere of influence amendments, it is important that it contain some basic information.

A3-

**General**

We would like some clarification on a couple of comments in the EIR and policies of the General Plan. First, we do not fully understand the proposed revised Sphere of Influence and its relationship to the proposed Urban Growth Boundary. On page 7 of the draft General Plan, it is stated, "in addition to the above, the General Plan identifies an Urban Growth Boundary (UGB) and two exception areas within which the City may approve urban uses. The UGB includes the existing City Limits and portions, but not all, of the Existing Sphere and Proposed Sphere expansion." The DEIR further states that the city wants to (1) "extend the sphere of influence to the north of the existing City limits", (2) to "add Asti to the sphere of influence and General Plan Study Area", and (3) "include Raines Creek Water District in the sphere of influence and General Plan Study area."

A3-

Paul Kelley, Chair  
County Member  
  
Mike Kerns,  
Commissioner  
County Member  
  
Valerie Brown, Alternate

Steve Allen, Commissioner  
City Member  
  
Lisa Schaffner, Vice Chair  
City Member  
  
Teresa Barrett, Alternate  
Commissioner  
City Member

Ray Brunton, Commissioner  
Special District Member  
  
Mark Bramfitt, Commissioner  
Special District Member  
  
Albert Giordano, Alternate  
Commissioner  
Special District Member

Jean Kapolchok, Commissioner  
Public Member  
  
Mark Ihde, Alternate  
Commissioner  
Public Member

We understand the two exception areas are south of the existing City limits, the County Urban Service Area, and the Sphere of Influence. The proposed City UGB appears to include both the Industrial and Asti exception areas, neither of which is contiguous to the remainder of the City. With the exception of City owned property, such as the airport, territories must be contiguous to City boundaries for annexation consideration. Therefore, LAFCO cannot approve an annexation of these exception areas without a legally adequate connection to the rest of the city. Neither the draft General Plan or the EEIR addresses how the City will establish this connection or the impacts of annexation the area between the existing City limits and the Asti exception areas.

### **Agricultural Lands**

Sonoma LAFCO staff has concerns about converting prime agricultural lands to urban uses and the impact of urban uses on agriculture. The staff believes the DEIR needs additional analysis of the impacts of extending urban uses both north and south of the existing City limits. The DEIR states:

**“Cumulative Important Farmland Conversion Impact 4.2.4** Implementation of the proposed General Plan, along with other proposed development in Sonoma County, would contribute to the additional conversion of Important Farmland to other uses. This is a **potentially cumulatively considerable** impact.

As previously discussed, implementation of the City of Cloverdale General Plan would result in the conversion of Important Farmland in the Study Area. Implementation of the proposed GPU would affect 484.4 acres of Farmland in the Study Area. However, all but 29 acres would be designated Conservation Feature by the proposed General Plan. One of the intents of the Conservation Feature designation is to preserve agricultural lands and would allow the preservation of Farmland. Important Farmland conversion associated with implementation of the General Plan planned land uses would be in addition to farmland conversions associated with development anticipated under the applicable land use plans of Sonoma County and several cities within the county, particularly those cities located along US 101. As noted in DEIR Section 4.2, **Table 4.2-5**, Sonoma County experienced a four percent loss of Important Farmland between 1994 and 2004. If grazing land is included, the total agricultural land loss in that period was 28,641 acres. Some of that loss occurred due to conversion to urban uses, as Urban and Built-Up Land increased by 9,685 acres in that time.

The EIR needs more analysis of the impacts of placing 455.4 acres of agricultural lands in the Conservation Feature classification and, possibly, in the Sphere of Influence. The agricultural area between the industrial exception area and the Asti exception area needs more detail and analysis. Sonoma LAFCO has adopted policies to protect

A3-3

agricultural lands from premature conversion to urban uses that are not reflected in the EIR.

The policy of Sonoma LAFCO is as follows:

Agricultural Lands In addition to considering the policies and priorities set forth in Government Code Section 56377, this Commission shall conform to the following policies in reviewing and approving or disapproving proposals, which may result in the conversion of agricultural land to non-agricultural uses:

- A. The Commission shall consider whether the proposal would adversely affect the County's agricultural resources based on the following factors:
  - (1) Agricultural significance of the subject territory and adjacent areas relative to other agricultural lands in the region.
  - (2) Use of the subject territory and adjacent areas.
  - (3) Whether public facilities for proposed development would be a) sized or situated so as to facilitate conversion of adjacent or nearby agricultural land, or b) extended through agricultural lands which lie between the project site and existing facilities.
  - (4) Whether uses incompatible with adjacent agricultural uses are expected to result from the proposal and whether natural or man-made barriers would buffer adjacent or nearby agricultural lands from the effects of proposed development or other incompatible uses.
  - (5) Whether the subject territory is located within the sphere of influence of a city or district providing sewer and/or water service or within an "Urban Service Boundary" designation of the Sonoma County General Plan.
  - (6) Provisions of applicable general plan open space and land use elements, growth management policies, or other statutory provisions designed to protect agriculture.
- B. The Commission shall discourage proposals which would likely convert to urban uses those lands identified by the County General Plan as suitable for long-term agricultural or open space use or identified by the Sonoma County Agricultural Preservation and Open Space District Acquisition Plan as a priority for acquisition or protection in cooperation with willing landowners.

Based on the Sonoma LAFCO policies, the above criteria should be evaluated in the EIR to determine what potential impacts there will be of adding the territory to the Sphere of Influence.

### **Williamson Act Contracts**

The Draft Environmental Impact Report states:

“There are a few properties in the Study Area that are under a Williamson Act contract. Most of these properties are located in the northern portion of the Study Area and southeast of the existing Cloverdale city limits. Many of these properties have been designated for development under the proposed Land Use Diagram.”

A3-4

The draft EIR does not identify these properties, thus they are not analyzed in sufficient detail. The EIR should include maps, acreage, existing uses and, if necessary, mitigations. The Sonoma LAFCO policy is very clear in not favoring inclusion of properties with Williamson Act contracts in the sphere of influence. The policy does provide for some exceptions, but these are very specific. Because the status of the contract is critical to the LAFCO decision, that information should be included in the final EIR.

The policy of Sonoma LAFCO is as follows:

#### Territory Subject to Williamson Act Agricultural Preserve Contracts

- A. Proposals establishing or amending spheres of influence and/or annexations for territory with an existing Agricultural Preserve Contract shall be prohibited, unless the annexing agency protested the establishment of the contract and it was upheld by LAFCO.
- B. Notwithstanding the provision of subsection "a", the Commission may approve the inclusion of territory subject to the Agricultural Preserve Contract within the sphere of influence of a city or special district able to provide urban services if it complies with all of the following criteria:
  - (1) The landowner has filed a notice of non-renewal with the Sonoma County Board of Supervisors.
  - (2) The contracted territory is being phased out of Agricultural Preserve and there are no more than five (5) years remaining in the term of the contract.

If you have any questions concerning our comments, please contact me by e-mail at [rbottarini@sonoma-county.org](mailto:rbottarini@sonoma-county.org) or by telephone at 707-565-3765.

Sincerely,



Richard Bottarini  
Executive Officer



**SONOMA COUNTY  
PERMIT AND RESOURCE MANAGEMENT DEPARTMENT**

2550 Ventura Avenue Santa Rosa, CA 95403-2829  
(707) 565-1900 Fax (707) 565-3767

January 9, 2009

City of Cloverdale  
Community Development Department  
ATTN: Bruce Kibby  
126 North Cloverdale Boulevard  
Cloverdale, CA 95425  
Fax 894-1793

Re: Comments on the Cloverdale Draft General Plan and DEIR

Att: Bruce Kibby, Community Development Director

Thank you for this opportunity to comment on the City's Draft General Plan, and DEIR. The comments which follow focus on potential impacts and policy issues with regard to the proposed urban growth boundary, agriculture, and transportation.

**General Comments**

- The DEIR references the "Draft Sonoma County General Plan". This reference should be changed to GP2020, which was adopted by the Sonoma County Board of Supervisors on September 23, 2008. A4-1
- Section 4.1.1. Existing Setting: Sonoma County has nine, not eight incorporated cities, and the Town of Windsor should be included in the list of Sonoma County cities. A4-2

**Urban Growth Boundary**

The City is to be commended for establishment of an Urban Growth Boundary (UGB). However, the proposed location of the UGB raises several concerns and potential impacts to agriculture that need to be discussed and analyzed in the EIR:

- The Asti and Industrial Exception Areas are not contiguous with the remainder of the proposed UGB, and appears to conflict with the provisions of the Cortese-Knox-Hertzberg Local Government Reorganization Act. The EIR needs to demonstrate that the Sonoma County Local Agency Formation Commission (LAFCO) will be able to make the required findings under Cortese-Knox-Hertzberg allowing creation of these islands. A4-3
- The western portion of the proposed UGB appears to follow a topographic contour rather than parcel boundaries, allowing for partial annexation of parcels, which may increase development potential. Additionally, many parcels within the proposed UGB currently lack additional development potential under GP2020 land use policies. As proposed, future annexations under the proposed UGB have potential to create increased development that is inconsistent with GP 2020 land use policies. The EIR should analyze the impacts of any additional development potential created by the proposed UGB, identify measures to mitigate these impacts, and evaluate a reasonable range of alternatives. A4-4

To help mitigate growth inducing impacts associated with the proposed UGB, we recommend the City consider an alternative UGB that excludes agricultural lands as much as possible and follows the boundaries of unincorporated parcels nearest to the current City limits.

### **Agriculture**

Impact 4.2.3 in the DEIR states:

“There are a few properties in the Study Area that are under a Williamson Act contract. Most of these properties are located in the northern portion of the Study Area and southeast of the existing Cloverdale city limits. Many of these properties have been designated for development under the proposed Land Use Diagram.”

The DEIR needs to discuss this impact in greater detail by including the number and type of Williamson Act contracts affected, existing agricultural uses, and the potential to displace or impact agricultural operations. An analysis of consistency with County and LAFCO policies regarding annexation of lands under Williamson Act contracts need to be provided.

Cumulative Important Farmland Conversion Impact 4.2.4 assumes the Conservation Feature designation will adequately protect farmlands from conversion to non-farming uses. This assumption appears inadequate in that it does not consider the effect of extending public facilities through farmlands in order to serve the Industrial and Asti Exception Areas. The EIR should describe the details of how public facilities will be extended through farmlands to these areas, and identify both potential impacts to farmlands, and growth inducing impacts associated with extension of services.

To help mitigate this impact, we suggest adding policy language to the General Plan allowing extension of water and sewer services only when necessary to resolve a public health hazard resulting from existing development, or where necessary to allow an affordable housing project providing at least 20% of the units for lower income housing on properties adjoining urban service boundaries. Such policies should be consistent with similar limitations in GP2020.

Finally, the EIR needs to consider if development in the Industrial and Asti Exception Areas is compatible with the surrounding agricultural uses. In order to prevent conflicts between agriculture and urban uses, the City's proposed policy LU-3.3 should incorporate buffers and landowner agreements consistent with the County's Right to Farm Ordinance referenced by GP2020 Policy AR-4d.

### **Transportation**

Sonoma County General Plan Policies CT-1m through CT-1p recognize the need for development of regional agreements to ensure that local development pays its fair share toward mitigating regional traffic impacts. The cities of Petaluma and Rohnert Park have developed similar policies supporting development of a regional “fair share” traffic mitigation fee, and identifying the Sonoma County Transportation Authority as the agency with the overall responsibility for regional circulation and transit coordination between the City and County. We recommend adding the following implementations to Policy CE 1-1 in order to support regional sharing of traffic impact fees:

- Designate SCTA as the agency with the overall responsibility for regional circulation and transit coordination between the City and County.
- Work with the County and SCTA to develop and adopt regional/ subregional fees and/or allocate a fair share contribution to accommodate transportation demand created by new development.

Thank you for the opportunity to comment on your General Plan update and DEIR. We look forward to supporting the City in it's development of the new General Plan. If you have any questions about this letter or County policies, please feel free to call me at 565-8340.

Sincerely,  
  
Gary Helfrich  
Planner II

Copies: Paul Kelly 4<sup>th</sup> District Supervisor  
Pete Parkinson PRMD  
Jennifer Barrett PRMD  
Richard Bottarini LAFCO



Linda S. Adams  
Secretary for  
Environmental Protection

**California Regional Water Quality Control Board  
North Coast Region  
Bob Anderson, Chairman**

www.waterboards.ca.gov/northcoast  
5550 Skylane Boulevard, Suite A, Santa Rosa, California 95403  
Phone: (877) 721-9203 (toll free) • Office: (707) 576-2220 • FAX: (707) 523-0135



Arnold  
Schwarzenegger  
Governor

December 8, 2008

Mr. Bruce Kibby  
Community Development Department  
126 North Cloverdale Boulevard  
Cloverdale, CA 95425-0217

Dear Mr. Kibby:

**Subject:** Comments on the Draft Environmental Impact Report (DEIR) for the City of Cloverdale General Plan Update, Sonoma County  
SCH No. 2007082143

**File:** City of Cloverdale

Thank you for the opportunity to comment on the scope and content of the DEIR for the Cloverdale General Plan Update. We appreciate the chance to respond and express concerns early in the environmental review process relating to our statutory responsibility. The North Coast Regional Water Quality Control Board (Regional Water Board) is a responsible agency for this project, as defined by the California Environmental Quality Act (CEQA) having jurisdiction over the quality of ground and surface waters (including wetlands) and the protection of the beneficial uses of such waters. The DEIR identifies potentially significant environmental impacts of City development until the year 2025. The document identifies key policies intended to guide development practices and to mitigate for their potential impacts on the environment.

We have reviewed the DEIR prepared for the Cloverdale General Plan Update and offer the following comments and recommendations in our role as a trustee and responsible agency under CEQA:

**General Comments**

While there are a number of very positive policies and mitigation measures in the General Plan Update, we are concerned that development related impacts in the Cloverdale area will result in significant degradation to surface and ground water quality. Specifically, impacts related to loss of riparian habitats and wetlands, storm water pollution and hydromodification have been identified without clear, specific mitigation measures to avoid or minimize these impacts. Although the Regional Water Board has

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Mr. Kibby

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December 8, 2008

permitting authority over individual storm water and waste water discharges and therefore has regulatory tools to implement water quality mitigation, we would prefer that the City use its General Plan process to incorporate its own reasonable, specific mitigation measures for identified environmental impacts (as well as implementing public education and outreach regarding responsible water use, conservation, reclamation, re-use, sustainability, watershed planning and waste discharges). By implementing reasonable environmental controls at the local level, the permitting process can be streamlined for the general public. In addition, by taking steps to reduce development impacts on water quality, the City may avoid or delay the need to retrofit existing facilities and development with control measures necessary to correct water quality impairment.

The DEIR includes too few clear, enforceable mitigation measures. It is ineffective for a General Plan Update to issue broad and unenforceable policy statements as mitigation measures (for example the use of terms such as "encourage" and "support" are not enforceable mitigation measures). Some of the General Plan Update's policies and implementation measures intended to mitigate impacts to aquatic and riparian habitat and water quality are inadequate mitigations pursuant to CEQA §15370, and many are unenforceable. According to CEQA §15370, mitigation includes:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action;
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment;
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and
- (e) Compensating for the impact by replacing or providing substitute resources or environments.

We strongly recommend that clear and enforceable mitigation measures be developed and fully implemented to ensure that General Plan policies are met. Implementation of these measures should also be enforced, mandating the minimization of direct and indirect environmental effects of the proposed General Plan Update.

#### **Surface Water**

The General Plan represents a picture of what the City will look like in 2025 based on the Plan's goals and policies. The proposed General Plan Update anticipates development of an additional 607 acres over this time. It is unclear whether this includes development within the city limits and it is also unclear where the proposed annexations will occur by the year 2025. The Maps included in the DEIR are largely illegible and unclear. The DEIR does not include a detailed map showing the locations of surface water features potentially impacted by the General Plan Update. Moreover, the DEIR only considers three creeks to be significant and does not define why others are not

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A5-1  
continued

A5-2

Mr. Kibby

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significant. All surface water features (including drainages and wetlands) are jurisdictional waters of the State.

The Russian River is listed on the Regional Water Board's 303(d) list as impaired due to excess sediment and elevated temperature. The proposed General Plan Update would allow for an increase in urban development, which would generate increased storm water runoff containing various types of pollutants, leading to hydromodification, habitat degradation, and increased discharge of pollutants to receiving waters. Urban development includes more construction activities, which have the potential to discharge sediment and other waste to receiving waters. The preparation of the General Plan Update presents the City with an opportunity to manage, protect, and enhance beneficial uses and water quality in the future and we recommend developing more specific, enforceable implementation measures in order to do so. As stated in the DEIR, riparian buffer zones serve critical functions for aquatic species, wildlife and humans. Regional Water Board staff requests maximizing riparian setbacks for roadways, structures, intensive landscaping and agriculture, and developed park areas. Setbacks provide benefits for flood control, water quality enhancement, erosion protection, wildlife habitat and passage, aquatic habitat, aesthetics, and public recreation. Healthy riparian zones are valuable for mitigating impacts from urbanization and may help to avoid future regulatory measures. Adequate riparian setbacks are essential in helping to maintain water quality and to create wildlife habitat and corridors. Setbacks for all surface waters should be included in specific ordinances and should apply to all surface water features. We strongly recommend expanding the development buffers along all flood-prone creeks and the Russian River.

A5-3

Creek maintenance for flood control should recognize the need to keep a sufficient shade canopy over the creek. Bioengineering techniques using plants and natural materials should be used in all bank stabilization projects. Shaded creek flows are cooler and can make a significant difference in terms of the health and diversity of aquatic life. Rehabilitation and continual surveillance of waterways will enhance beneficial uses and help meet the City's natural resource objectives. Encouraging cooperation with restoration efforts by other agencies and non-profits is an inadequate approach to meeting the objectives set forth in the General Plan.

A5-4

The final EIR should include specific protection measures for sensitive areas (including wetlands) and especially those habitats harboring special status species. The Regional Water Board suggests a GIS database for mapping these areas for the public and agencies. We are aware of an existing database that could be used for this purpose and would be happy to work with City staff in this effort. We strongly recommend the Final EIR include specific policies and implementation measures aimed at enhancing surface water features rather than just mitigating the adverse impacts. This should include specific restoration and public outreach programs to enhance the natural water systems within the sphere of influence.

A5-5

Another source of erosion is ground disturbance on construction sites that have not been properly protected from winter rains. Accelerated erosion results in high turbidity levels and water quality degradation which is harmful to human and aquatic life. The

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City should adopt an Urban Growth Boundary (avoiding growth to the west), a Hillside Ordinance and a Grading Ordinance as early as possible relating to all new development and retrofits. A grading ordinance will help to reduce excess sediment discharges to streams and rivers in the area. Erosion and sedimentation control standards should apply to logging and all projects requiring grading, excavation, vegetation removal, diversions, pumps, gravity flow systems, and roads (including small private domestic uses or projects).

A5-6

We strongly encourage City staff to develop watershed-specific priorities and work plans, use all existing authorities and tools to address sediment discharges, conduct public outreach, enhance non-regulatory actions, develop a guidance document on sediment waste discharge control, develop a monitoring strategy and work with local governments to develop sediment prevention, reduction, and control strategies, such as grading ordinances and road management policies. There are plenty of resources available to minimize impacts of urbanization, yet implementation and monitoring are lacking in society and in this document. Addressing problems of water quality degradation now can prevent further impacts and reduce future costs.

Impacts to wetlands and waters of the State

Waters of the State include all waters of the United States and any waters deemed non-jurisdictional as waters of the U.S. Additionally, the loss of wetland areas, either natural or constructed as mitigation areas, and their beneficial uses which may be impacted by development activities must be fully permitted and mitigated. These impacts should first be adequately evaluated to see if any can be avoided or minimized. All efforts to first avoid and second to minimize impacts to waters of the State must be fully exhausted prior to deciding to mitigate for their loss. If, after careful and adequate evaluation, the project's impacts to waters of the State are deemed unavoidable, then compensatory in-kind mitigation (for acreage, function and value) will be necessary for direct and cumulative impacts. For example, seasonal wetland impacts must be mitigated by seasonal wetland mitigation; linear watercourse impacts must be mitigated by linear watercourse mitigation.

A5-7

For unavoidable impacts to waters of the State, submittal of applications for 401 Water Quality Certification and/or Waste Discharge Requirements (Dredge/Fill) permits from the Regional Water Board will be necessary. United States Army Corps of Engineers Clean Water Act Section 404 permits and Department of Fish and Game stream alteration agreements may also be necessary. This information must be included in the DEIR as a resource for future development.

**Storm Water**

The quality of storm water runoff is correlated to the extent of impervious surfaces within a watershed. We encourage disconnection of impervious areas from storm drain systems and routing to vegetated areas. We strongly support infiltrating treated storm water runoff into the ground as a means of treating it and recharging ground water supplies. This helps to buffer low summer/fall flows which in turn help to reduce water

A5-8

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Mr. Kibby

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scarcity and creek temperatures. Please see the attached list of Storm Water and Low Impact Development (LID) resources we have included for your benefit in proceeding with the General Plan Update.

Recent studies have confirmed that increased impervious surfaces within a watershed will lead to alteration of the natural hydrology expressed as higher winter flows (peak flows) and lower summer/fall flows (base flows). Alteration of the natural flow regime (hydromodification) can result in increased stream temperatures associated with base flows, alteration of the channel morphology (e.g. widening or incising of stream channel) associated with increased peak flows, adverse impacts to native riparian vegetation and reduction in ground water recharge capabilities. The design and construction of new development projects using LID can protect natural flow regimes and reduce the impacts of hydromodification and thus help prevent adverse impacts to stream and wetland systems.

All newly installed impervious surfaces (runway, roads, roofs, sidewalk, etc.) must incorporate post-construction storm water best management practices (BMPs) to remove any contaminants and to attenuate peak flows, before discharge to waters of the State. We strongly encourage the use of LID techniques to address potential storm water impacts as close to the source as possible. Dry detention basins (particularly those with limited detention times) are not effective for pollutant removal. We suggest that the City develop a mandatory program to implement LID for new developments and retrofit projects. Permeable pavements can have significant benefits as long as subdrains are not needed. By minimizing urban runoff, LID techniques promote healthy aquatic systems and can reduce flood and drainage control costs over time.

#### **Wastewater**

Regional Water Board staff strongly recommends implementing a water recycling program for new development. The development of the Alexander Valley hotel and golf course presents the city with a significant opportunity to use reclaimed water on proposed landscaping while supporting the importance of water conservation in the present and in the future.

Policy LU 6-3 reads:

"Discourage development beyond areas with planned expansions of sewer, water, and road systems. Develop a growth phasing plan that addresses location and timing of development and infrastructure."

In order to implement this policy, we recommend the City adopt an Urban Growth Boundary as soon as possible. This would also achieve the objectives of the General Plan in establishing a long-term vision for the future over the next ten to twenty years. Planned growth should be limited to the established 200-units per year and should also be limited to areas with existing or planned city sewer capabilities.

A5-8  
continued

A5-9

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Mr. Kibby

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**Groundwater**

Section 4.4, Page 4.4-2 should include information in the Cortese List maintained by Cal EPA and include sites of the Regional Water Boards.

It should be noted that the former Masonite Wood Treatment Facility is inaccurately mapped on DTSC's EnviroStor. The former Masonite Wood Treatment Facility is located on the Tyris property on Asti Road and Santana Lane. The former Masonite Wood Treatment Facility is part of the proposed golf course development. An investigation for wood treatment chemicals in shallow and bedrock groundwater is ongoing.

Page 4.4-4 under the heading Underground Storage Tanks incorrectly states that the North Coast Regional Water Board, with oversight from Sonoma County, administers the underground storage tank program. It should read: "Sonoma County, with oversight from the North Coast Regional Water Board, administers a cleanup program to address discharges from underground storage tank (UST) systems."

The General Plan should include mitigation measures to require soil and/or groundwater management plans for closed and active cleanup sites when development and/or utility lines are proposed on or in close proximity to the sites. Development of closed and active cleanup sites could result in encountering contaminated soil and/or groundwater. This includes trenching and installation of utility lines near these sites. Mitigation measures should include requirements for a soil and/or groundwater management plan to address the potential for encountering contamination; reporting to the Regional Water Board; and methods for sampling, storage, prevention of contaminant migration during construction activities, and proper disposal of contaminated materials.

**Potential Project Permits**

The following summarizes project permits that may be required by our agency depending upon potential impacts to water quality. This information should be included in the final document and in the General Plan.

**Water Quality Certification (401 Certification):** Permit issued for activities resulting in dredge or fill within waters of the United States (including wetlands). All projects must be evaluated for the presence of jurisdictional wetlands and other waters of the State. Destruction of or impacts to these waters should be avoided. Under the Clean Water Act Sections 401 and 404, disturbing wetlands requires a permit from the United States Army Corps of Engineers (ACOE) and a State 401 water quality certification. To determine whether wetlands may be present on any proposed construction site, please contact Jane Hicks of ACOE at (415) 977-8439. If wetlands or other waters of the State are present, please contact Mark Neely at (707) 576-2689. Alterations or work within or adjacent to streambeds or lakes may also require a 1602 Lake and Streambed Alteration Agreement from the California Department of Fish and Game (CDFG). Removal of riparian vegetation also

A5-10

A5-11

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Mr. Kibby

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requires this permit. We recommend that all applicants contact CDFG for additional information on these requirements.

**Waste Discharge Requirements (WDRs) or a Conditional Waiver of WDRs:**

Under authority of the California Water Code, the Regional Water Board may issue WDRs for any project which discharges or threatens to discharge waste to waters of the State. Projects that impact waters of the State (including any grading activities within stream courses or wetlands) require permitting by the Regional Water Board. The Regional Water Board may also require permits for discharges of post-construction storm water runoff and on-site septic systems accepting 1,500 gallons or more per day. An application may be printed from the State Water Resource Control Board website at: [www.swrcb.ca.gov/sbforms/](http://www.swrcb.ca.gov/sbforms/).

**General Construction Activity Storm Water Permit:** Land disturbances on proposed projects of one acre or more require a general construction storm water permit. If the land disturbance will be in excess of one acre, the owner of the property will need to apply for coverage under this permit prior to the commencement of activities on-site. This permit requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) that identifies BMPs to minimize pollutant discharges from the construction site. The permit also requires inspections of construction sites before and after storm events, and every 24 hours during extended storm events. The purpose of the inspections is to identify maintenance requirements for the BMPs and to determine the effectiveness of the implemented BMPs. Owners may call our office to receive a permit package or download it off the Internet at [www.waterboards.ca.gov](http://www.waterboards.ca.gov).

**General Permit for Winery Wastewater:** The Regional Water Board implements a General Permit for Discharges of Winery Waste to Land, Order No. R1-2002-0012. Permit coverage is needed for discharges of winery process wastewater and discharges of grape pomace to land. Applicants should contact Rhonda Raymond at (707) 576-2708 to determine whether coverage under this general permit is appropriate for any winery project.

The preparation of the General Plan Update presents the City with an opportunity to manage, protect, and enhance beneficial uses and water quality in the future. Although we appreciate the City's efforts in addressing water quality issues in the stated policies, we would like to see more detailed mitigation proposals. The DEIR does not specify how these policies are being implemented or enforced. We also expect to see detailed public education and outreach programs and or policies, and at a minimum, a process to provide future development applicants information on our permitting authority.

A5-12

**California Environmental Protection Agency**

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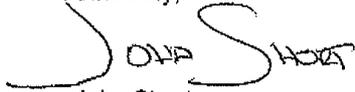
Mr. Kibby

-8-

December 8, 2008

If you have any questions or comments, please contact me at (707) 576-2065 or by email at [jshort@waterboards.ca.gov](mailto:jshort@waterboards.ca.gov).

Sincerely,



John Short  
Senior Water Resources Control Engineer

120808\_AJT\_Cloverdale\_GP\_DEIR.doc

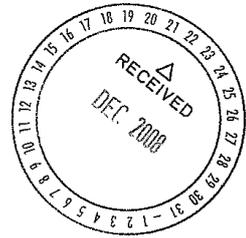
Enclosures: LID and Storm Water Resources

cc: Mr. Scott Morgan, State Clearing House, P.O. Box 3044,  
Sacramento, CA 95812 RE: SCH No. 2007082143

**California Environmental Protection Agency**

Recycled Paper

O6



December 17, 2008  
Planning Commission  
City of Cloverdale

Commissioners:

The Committee for Urban Growth Boundary is contacting you in anticipation of your review of the draft Cloverdale General Plan. The Committee has been tracking this process for the last 3-plus years, since the Citizens' Advisory Committee made its recommendation. We look forward to seeing the General Plan adopted, but think it would be a shame for it to be adopted in an incomplete form, lacking the Urban Growth Boundary for which the community has shown so much support.

We enjoyed meeting with each of you recently and would like to reiterate the following recommendations for the process of UGB adoption:

- UGB language should be adopted into the General Plan with language specifying allowed and disallowed uses outside the line.
- The General Plan should include a map of the intended UGB line.
- Adoption of additional policy language is necessary to create conformity within the General Plan.
- Adoption of procedure for protection of hillside lands above 20% slope.

O1-1

We would like to emphasize that the city's current plan to adopt the UGB by ordinance upon final adoption of the General Plan is not acceptable and will not give the UGB the legal strength that has been the intent of its adoption throughout the General Plan update process. Relying on an ordinance would be a failure to achieve the goals of a UGB, i.e., voter control of a legally certain line, defining where development will and will not occur.

O1-2

We wish to thank you for your support and efforts to provide a legally meaningful Urban Growth Boundary for the City of Cloverdale.

Sincerely,

*Virginia Greenwald, Bonnie Arustein*

Co-Chairs- Citizens for a UGB

DATE: 12/17/08  
BY: [Signature]

Cc: Bruce Kibbe

December 9, 2008

Bruce Kibby  
Community Development Director  
City of Cloverdale  
P.O. Box 217  
Cloverdale, CA 95425

Re: Draft General Plan Environmental Impact Report

Mr. Kibby:

We have reviewed the proposed General Plan and the draft General Plan Environment Impact Report (DEIR) and have several comments. First, we recognize that the City has spent a great deal of time and effort on preparing and distributing a well thought-out draft of the General Plan and DEIR. In order that these documents be complete to the greatest extent possible, we offer the following questions and recommendations around the DEIR's analysis. As a self-mitigating General Plan, mitigations must be adopted as policies into the General Plan to be valid. As such, we suggest policies to be adopted in the General Plan by way of suggesting acceptable mitigations for impacts identified in the General Plan.

O2

**Urban Growth Boundary**

While the General Plan calls for the adoption of an urban growth boundary, the DEIR's analysis does not include an analysis of the impacts or mitigating benefits of adopting the urban growth boundary. We find it problematic that the DEIR's analysis relies on a potential line, yet the General Plan does not actually identify the urban growth boundary, nor allowed uses inside and outside the line. Nor does the General Plan and DEIR identify the urban growth boundary as a Planning Area in Table 3.0-2

O:

We are also concerned that the City's proposed method of adoption of the urban growth boundary fails to mitigate possible inconsistencies with the General Plan that may occur through adoption of an ordinance. Under California State planning regulation, the General Plan is the top-tier planning document. Land use policies adopted into the General Plan supersede all other ordinances, which are subservient to them. Based on several court cases, and based on principles of General Plan consistency outlined in the Government Code (Gov. Code 65300 et seq.), we conclude that an ordinance adopted by voters must be included into the General Plan in order to ensure consistency. While this may be possible, we suggest that the City adopt the urban growth boundary language

O:

directly into the General Plan during this process in order to avoid potential consistency conflicts in the future.

Furthermore, a UGB adopted by ordinance alone, even if it is “locked in” under voter control, could be rendered ineffective through passage of a General Plan amendment in the future. Thus, the General Plan and DEIR may not rely on the existence of the urban growth boundary as a mitigation for impacts on farmlands and natural areas inside the Sphere of Influence but outside the proposed urban growth boundary. The only way to use the urban growth boundary as a mitigation is to adopt language into the General Plan that spells out allowed uses inside and outside the line, and that includes the line on the Land Use Map. Will the urban growth boundary be adopted into the General Plan with language specifying allowed and disallowed uses outside the line?

O2-3  
contin

In order for the UGB to carry weight in the General Plan, and to maintain General Plan consistency, a map must be included in the General Plan that shows where the intended UGB line lies. This map may use a hillside slope descriptor for the western edge of the UGB, but must show visually in an understandable format where the line will lie. To be an effective UGB, the UGB policies and the General Plan's UGB map should then be referred to the voters after the General Plan is adopted. Will the General Plan include a map of the intended UGB line?

### Conservation Areas

We were confused by the dramatic increase in conservation feature lands included within the General Plan study area, as seen in Table 3.0-7. We are concerned that the DEIR lacks analysis of the impacts of adding these “conservation” areas to the sphere of influence for an urban area. Nor do General Plan policies adequately control for potential development that might occur in these areas in the future once they are added to the Sphere of Influence. An adequate mitigation *might* be adoption of the urban growth boundary into the General Plan language. How does the General Plan mitigate the development potential created on “conservation areas” through their addition to the Sphere of Influence, development of industrial and commercial uses nearby, and the extension of urban services through these “conservation areas”?

O2-

### Agricultural Land

As stated by the DEIR in Section 4.2, Table 4.2-5, Sonoma County experienced a 4% loss of Important Farmland from 1994-2004. Including grazing lands, the total loss of agricultural lands in that period was 28,641 acres. We are concerned that the General Plan allows for the future conversion of agricultural lands to urban and developed uses. The DEIR does not adequately address the potential conversion of agricultural lands, due to their addition to the Sphere of Influence to the north and south of town. Conversion of Important Farmland is listed as a **potentially cumulatively considerable** impact. However, the DEIR fails to thoroughly analyze the impacts adding farmland to the urban service area.

O2-

We do not find adequate policies in the General Plan to protect these lands from future development. We would recommend as a potential mitigation the adoption of stronger policies that would ensure that agricultural lands are protected from development pressures. This could be through the adoption of a policy that would keep pipes for urban services that are extended through agricultural lands to developments, both within the City Limits and within designated Urban Growth Boundary Expansion Areas, to the minimum size necessary to serve urban development. This may look similar to the Sonoma LAFCO policy A(3) for Agricultural Lands, which considers whether public facilities are sized and situated in a manner that would facilitate the conversion of adjacent or nearby agricultural lands at a future time. However, even this policy may not be an adequate mitigation. Therefore, we recommend that the City adopt as a mitigation a revised Sphere of Influence that would exclude the Asti area and adjacent vineyards from the proposed Sphere of Influence. We also recommend that the City adopt the following policy language into the General Plan:

O2-  
cont

### **Policy LU 6-3**

*Plan expansions of sewer, water, and road systems to support development within the Urban Growth Boundary. Any expansion of sewer or water service to the UGB Exception Areas shall be provided with pipes sized at the minimum diameter necessary to serve the Exception Areas at buildout.*

### **Riparian Corridors**

With the recent adoption of the Sonoma County General Plan, the County adopted setbacks for development from riparian corridors, such as the Russian River, creeks, streams, and wetlands. In reviewing the Cloverdale General Plan, we did not find policies that addressed the adoption of a similar setback for the City. We were disappointed to find that there were three impacts identified to riparian areas and waterways in the DEIR - Impacts 4.9.1, 4.9.2, and 4.10.2. While these impacts are listed as less than significant, the City Limits and Sphere of Influence are contiguous to the Russian River's banks. When allowing development alongside a significant waterway, such as the Russian River, which is already impaired for water quality on several indicators, it is unlikely that less than significant impacts would be found. We have concerns that less than thorough analysis was completed with regards to the possible impacts on water quality in the Russian River and creeks within the General Plan Study Area. What are the full impacts of potential development done in the riparian corridors within the General Plan Study Area? As a possible mitigation, we recommend that the City adopt a riparian setback standard similar to that of Sonoma County:

O2-

**Policy OSRC-8b:** Establish streamside conservation areas along both sides of designated Riparian Corridors as follows, measured from the top of the higher bank on each side of the stream as determined by PRMD:

- (1) Russian River Riparian Corridor: 200'
- (2) Flatland Riparian Corridors: 100'
- (3) Other Riparian Corridors: 50'\*

### **School Siting**

We note that the DEIR Impacts 4.12.3 and 4.12.9c recognize that population growth may put pressure on existing schools, and may require the expansion of existing school facilities or construction of additional facilities. We are concerned that the policies and mapping in the General Plan do not adequately allow for these expanded facilities to be located within the urban growth boundary.

As land available for residential development exceeds that necessary to meet the population targets laid out in General Plan by 28%, and twice the land necessary is allocated for commercial and industrial to achieve a 1:1 jobs to housing ratio (source: Bruce Kibby, presentation to City Council, February 20, 2008), we recommend that the City mitigate Impact 4.12.3 and 4.12.9c by designating lands within the proposed urban growth boundary for public facilities for new or expanded school facilities. Why has the City not designated new lands within the proposed urban growth boundaries in the General Plan for expanded school facilities?

Furthermore, we recommend the adoption of the following policies to the General Plan as mitigations:

#### **Goal LU 5**

Encourage the Cloverdale Unified School District and other educational institutions to identify and provide sites and facilities for a full spectrum of educational opportunities within the City.

Implementation LU 5-1.c. Monitor school needs in south Cloverdale to determine if an elementary school site will be needed, *located within the Urban Growth Boundary and preferably within walking distance of housing.*

Implementation LU 5-1.e. Encourage educational institutions to open or establish Cloverdale campuses, including college and junior college campuses or satellite programs, private educational and trade schools at all levels, and in-city offices for campuses or programs *within the Urban Growth Boundary*, including co-located resources meeting a variety of educational needs at shared locations.

### **Hillside Protection**

After reviewing the General Plan and DEIR, we are confused as to how the City will designate which lands qualify as “above” and “below” Base of Hill. By using a line that is not yet delineated as a marker for where certain policies begin to be in effect, we are concerned that adopted mitigation may not be carried through on all of the intended lands.

In order to avoid possible impacts to hillside areas, we ask that the City adopt policies into the General Plan as mitigations that:

- Ensures surveying of the slope for each project that comes through on parcels near the UGB line.
- Expresses the City's intention that landowners with a partially developable parcel would donate conservation easements to the Open Space District on the lands above 20% slope in exchange for the right to develop on the flat portion of the parcel.

O2-8  
contin

Will the City adopt policies that ensure that hillside development does not occur as mitigations to policies 4.8.3, 4.8.4, and 4.8.6?

We thank you for your time and consideration of these comments.

Sincerely,

Daisy Pistey-Lyhne

Sonoma-Marin Field Representative  
Greenbelt Alliance

City of Cloverdale  
Community Development Department  
124 N. Cloverdale Blvd. Annex  
Cloverdale, CA 95425

ATTN: Bruce Kibby

RE: Draft Environmental Impact Report - Written Comment

November 3, 2008

According to the proposed General Plan, see page 39, Foothill Blvd. is designated as *arterial*. I respectfully request that the Planning Commission and Council reconsider this designation.

Clearly, in spite of its title, and especially from Treadway North to Porterfield Creek, Foothill Blvd. is designed and functions very well as a *residential street* ringed on both sides by single family homes (some with driveways directly onto it and/or a significant percentage of children and senior residents), bike lanes, walking areas, a major park and intersected by bridged creeks.

*Please note General Plan "Policy CE 1-3" which has special application to this situation: "Design streets in residential areas to minimize through traffic, to encourage internal movement by bicycling and walking, to provide safer and quieter neighborhoods, to minimize vehicular conflicts at intersections and to ensure that the impact of recreational traffic on local residents is minimized."*

As proposed, the General Plan does not conform to reality risking significant and irreversible consequences to everyone who uses the street.

Sincerely,

Roz Katz

314 Laurel Court

Cloverdale, CA 95425

I1-1

December 8, 2008

City of Cloverdale  
Attn: Bruce Kibby, Director



Subject: Comments on Draft EIR for General Plan Update of May 2007

Dear Mr. Kibby,

In addition to the questions I submitted last September and resubmitted this past November, I would like to submit one more related question:

The Chief of Cloverdale Fire Department has informed me that if the land west of the ends of First and Second Streets (the so-called Zanzi and Angeli properties) is developed with residential properties, the Department will *require* South Foothill to be extended from its northern terminus to connect with streets to the north, presumably to include First, and/or Second, and/or North Foothill. North Foothill connects to School Street, which leads to the High School, access to Jefferson School and Cloverdale Boulevard. **What will be the impact on circulation if these properties are developed, recognizing that South Foothill north of Brookside, North Foothill, and School Streets are designed to serve only as residential streets?**

The impact of developing these properties was not addressed in the draft EIR. The EIR needs to address not only the impact of the development itself, but the impact of the resulting required connection of South Foothill with streets to the north, creating a major new route between destinations in the north and south of the City.

Rationale for this question:

- Portions of South Foothill (north of Brookside), North Foothill, and School Streets are not designed to serve as arterials, though currently so designated. They are designed as residential streets. I believe that development of properties described above would cause significantly increased traffic flow on streets not designed to handle it and increasing through traffic in residential neighborhoods. Such a change would reduce existing safety levels and increase traffic noise in these neighborhoods.
- I believe that development of described properties, resulting in connection of South and North Foothill would cause circulation patterns in conflict with General Plan Goal CE 1-3: "Design street systems in residential areas to *minimize through traffic*, to encourage internal movement by bicycling and walking, and to *provide safer and quieter neighborhoods...*"

Thank you,

James Wagele  
302 Ranch House Rd.  
Cloverdale, CA 95425

I2-1



CARLE, MACKIE, POWER & ROSS LLP  
ATTORNEYS

100 B STREET, SUITE 400  
SANTA ROSA, CA 95401-6376

TEL: (707) 526-4200  
FAX: (707) 526-4707

FACSIMILE COVER SHEET

**Date:** December 9, 2008 **Time:** 10:37 AM

**To:** Bruce Kibby, Community Development Director  
City of Cloverdale **Fax No:** 707/894-1793

**From:** John G. Mackie, Esq. **Pages:** 6, including cover

**Re:** Draft General Plan EIR / Pacific States Industries, Inc.

**Client/Matter:** 2330.0001

**Operator:** HSD

Message

Please see attached letter dated December 9, 2008. Thank you.

Original will not follow

Original will follow by:

- Regular Mail
- Certified Mail, Return Receipt Requested
- Federal Express
- Other

The information in this facsimile transmittal is intended only for the use of the addressee and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient, or the employee or agent responsible for delivering this transmittal to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal service. We will reimburse postage. Thank you.



CARLE, MACKIE, POWER & ROSS LLP  
ATTORNEYS

100 D STREET, SUITE 400  
SANTA ROSA, CALIFORNIA 95401

TEL: (707) 526-4200  
FAX: (707) 526-4707

December 9, 2008

Via Facsimile, U.S. Mail and Electronic Mail

Bruce Kibby, Community Development Director  
City of Cloverdale  
126 N. Cloverdale Boulevard  
Cloverdale, CA 95425  
([bkibby@ci.cloverdale.ca.us](mailto:bkibby@ci.cloverdale.ca.us))

Re: Draft General Plan EIR

Dear Mr. Kibby:

This firm represents Redwood Empire Sawmills (a division of Pacific States Industries, Inc., "Pacific States"). On March 14, 2007 Zeke Sechrest, General Manager of Redwood Empire Sawmills wrote you on behalf of Pacific States. A copy of that letter is enclosed for your information. It was noted in that letter that Pacific States operates facilities at both the north and south ends of Cloverdale. A sawmill and log storage yard are located in the area of McCray Road (APNs 115-150-69 and 115-150-45) and a remanufacturing plant is located on Asti Road (APNs 118-010-034 and 118-010-15).

The revised Draft General Plan designates the location of all Pacific States facilities as General Industry. In our view, it is important for the City of Cloverdale to protect these facilities because of their economic value to the City of Cloverdale and the surrounding area. The City should review the current use permits issued by the County for the Pacific States facilities in order to more fully understand the intensity of use on the property. We acknowledge that the facilities are within the County jurisdiction, rather than City of Cloverdale jurisdiction and therefore any comments on zoning must be directed to the County.

We have the following concerns about the Draft General Plan and the EIR that sets forth proposed mitigation measures regarding the potential environmental impacts of the General Plan policies:

- Policy LU 1-4 encourages the balance of commercial and industrial land. Implementation LU 1-4.a. states that there should be a buffer between residential and industrial uses. As expressed in our March 14, 2007 letter, we are concerned about the potential increased residential development adjacent to the McCray Road property and inadequate buffer zones. This could lead to residents putting pressure on the City of Cloverdale and/or the County of Sonoma to remove the industrial uses. Therefore, we encourage as large and effective buffer zones as possible so as to maintain this industrial use. We also encourage the recording of notices for surrounding residentially designated properties, of the proximity of

I3-1

[www.cmprlaw.com](http://www.cmprlaw.com) [cmpr@cmprlaw.com](mailto:cmpr@cmprlaw.com)

**CMPR**

CARLE, MACKIE, POWER & ROSS LLP

Bruce Kibby, Community Development Director  
City of Cloverdale  
December 9, 2008  
Page 2

industrial uses. These could be deed requirements in the sale of surrounding properties.

- Implementation LU 1-4.b. recognizes the industrial uses to the south of the City, where we believe the Pacific States' Asti Road facility is located. The Draft General Plan states that under some circumstances, the industrial area could be moved. It is unclear whether this would apply to Pacific States' Asti Road parcel. Pacific States does not want its facilities to suddenly become non-conforming because of changes in the land uses outside of its control, although it does want flexibility in permitted uses of its property, for the future.
- Policy LU 3-1 provides for a popular vote on an Urban Growth Boundary. We understand that the proposed Urban Growth Boundary measure would allow some industrial uses, including the Asti Road facility, outside the Urban Growth Boundary. Because we continue to be concerned about the compatibility of industrial and non-industrial uses around Pacific States' facilities, it is the desire of Pacific States to maintain some flexibility to re-use its land should current uses be discouraged either explicitly or implicitly by the City of Cloverdale or the County of Sonoma or become economically unviable. We are pleased to see that the current industrial activities of Pacific States at its Asti Road facility will continue to be recognized as principal land uses. However, we are concerned about future scenarios in which the industrial use is either not acceptable to the community or not economically viable. In such scenarios, it might be very difficult to get voter approval for alternative uses and we consider this an unreasonable burden. We further understand that it would be the intention to limit infrastructure beyond the Urban Growth Boundary, except as needed for the industrial activity. Pacific States should not be deprived of access to necessary infrastructure, if it is not possible for the land to continue in industrial use.

I3-2

I3-3

Thank you for the opportunity to comment on the EIR for the Draft General Plan.

Very truly yours,



John G. Mackie

JGM:hsd

Enclosure

cc: Joe Burch, Pacific States Industries, Inc.

Tyris Corporation

December 5, 2008

**VIA FACSIMILE; Original by Mail**  
(707) 894-4673

Mr. Bruce Kibby  
Community Development Director  
City of Cloverdale  
126 North Cloverdale Boulevard  
Cloverdale, CA 95425

**Re: City of Cloverdale General Plan Update/Draft Environmental Impact Report**

Dear Mr. Kibby:

As you are aware, Tyris Corporation is the developer of the Alexander Valley Resort ("AVR Project") and has been processing a Specific Plan ("AVR Specific Plan") for the development with the City of Cloverdale since March of 2002. A Draft EIR for the AVR Specific Plan was issued in July of 2004, and a new Recirculated Draft EIR is anticipated to be issued before the end of the year. Tyris offers the following comments on the City General Plan Update and the Draft Environmental Impact Report ("EIR") prepared for the Update.

**General Plan Update (references are to Section numbers)**

1.7 - SPHERE OF INFLUENCE (Page 7): We suggest adding as sentence to the effect that "The City plans additions to its Sphere of Influence in connection with future projects and related annexations." As you are aware, a part of the AVR project is not currently in the City's Sphere of Influence and will need to be added prior to annexation to the City.

I4-1

Policy LU 2-4 (Page 25): We suggest that new language be added to the beginning of this policy to the effect "Unless included in or adjacent to a commercial area in an approved Specific Plan..." The AVR project includes a small commercial area. The original AVR Draft EIR included an approximately 13-acre commercial development which was subsequently removed from the project and the Specific Plan. Future development of the 13-acre parcel as a commercial development is likely and should not be "discouraged."

I4-2

Implementation LU 3-2.a (Page 26): We wish to comment on the restrictions on "Base of the Hill." The AVR Project has an isolated hill that is in the middle of what is otherwise a relatively flat area. We understood that the Base of the Hill provisions would not apply to the isolated hill on the AVR Project site, rather the intent was to make the provisions applicable to the base at the beginning of the hills surrounding the City. However, the maps showing the Base of the Hill areas include the isolated hill on the AVR Project site. We request that Exhibits/Figures showing the area to be subject to the Base of the Hill provisions be modified to exclude the AVR isolated hill. The AVR Specific Plan and its EIR will contain mitigations for all environmental impacts including Base of the Hill development.

I4-3

Implementation LU 6.1.c (Page 32): You may wish to consider changing the first sentence to read "Promote water conservation and encourage the use of water conserving landscaping, and the use of secondary treated water for landscaping and other watering needs where appropriate." The AVR Project plans on using secondary treated water to water its golf course.

I4-4

### **General Plan Update Draft EIR**

#### Section 3.0

Table 3.0-3: You may wish to clarify that the reference to "Resort" in the AVR Project description includes a hotel (i.e. "Resort Hotel").

I4-5

Figure 3.03: With reference to the AVR Project, this figure showing Pending Projects leaves out approximately 16 acres of the AVR Project site and should be corrected to include the entire AVR Project site.

I4

Page 3.0-30 - Destination Commercial: While the description accurately states that there is more than one area so designated, the text only describes the use for one of the areas. The AVR project is included in Area II of destination commercial, which the current General Plan text describes as "The primary uses encouraged within Area II are golf course or commercial recreation facilities, hotel, motel, convention center recreational vehicle parks, or campgrounds, and residential uses in conjunction with recreational amenities." We believe this distinction is important.

I4-7

Section 4.0

Table 4.0-3: You may wish to clarify that the reference to "Resort" in the AVR Project description includes a hotel (i.e. "Resort Hotel"). The AVR Project description should be corrected to provide for "40 attached res., 2.4 acre commercial" instead of "80 attached res., 2.5 acre commercial."

I4-8

Figure 4.0-1: With reference to the AVR Project, this figure showing Pending Projects leaves out approximately 16 acres of the AVR Project site and should be corrected to include the entire AVR Project site.

I4

Section 4.2

Figure 4.2-2: This appears to show a part of the AVR project site as Prime Farmland and a portion as Farmland of Statewide Importance. Attachment "A" to this letter is an Exhibit provided by the State Department of Conservation showing all but the most northerly finger of the AVR project site as Farmland of Local Importance. These distinctions can be meaningful for CEQA purposes and the discrepancy should be resolved.

I4-1

Section 4.3

Impact 4.3.1: In the chart on page 4.3-11, Implementation LU 1-2.a should include the following lead-in language "Unless included in an approved Specific Plan..." Because the AVR Specific Plan will include all required mitigations, the limits provided in this measure should not apply.

I4-1

Section 4.7

Impact 4.7.5 - Implementation PS 7-6.10: This implementation measure should begin with the words "Unless approved by the Sonoma County Airport Land Use Commission..."

I4-1

Section 4.9

Impact 4.9.3 - Implementation 6-1.b: Consider adding "Encourage the use of secondary treated water for landscaping and related uses where appropriate."

I4-1

Section 4.12

Impact 4.12.6 - Policies PR 1-4 and 1-5: These policies reference Exhibit 5.1 as showing open space and trails. Exhibit 5.1 shows an open space area in the middle of the residential portion of the proposed AVR Project and does not show the open space areas included in the proposed AVR project. The Exhibit should be conformed to the AVR Project.

I4-1

Please feel free to contact me if there are any questions or clarifications needed related to the above comment.

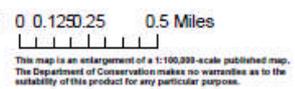
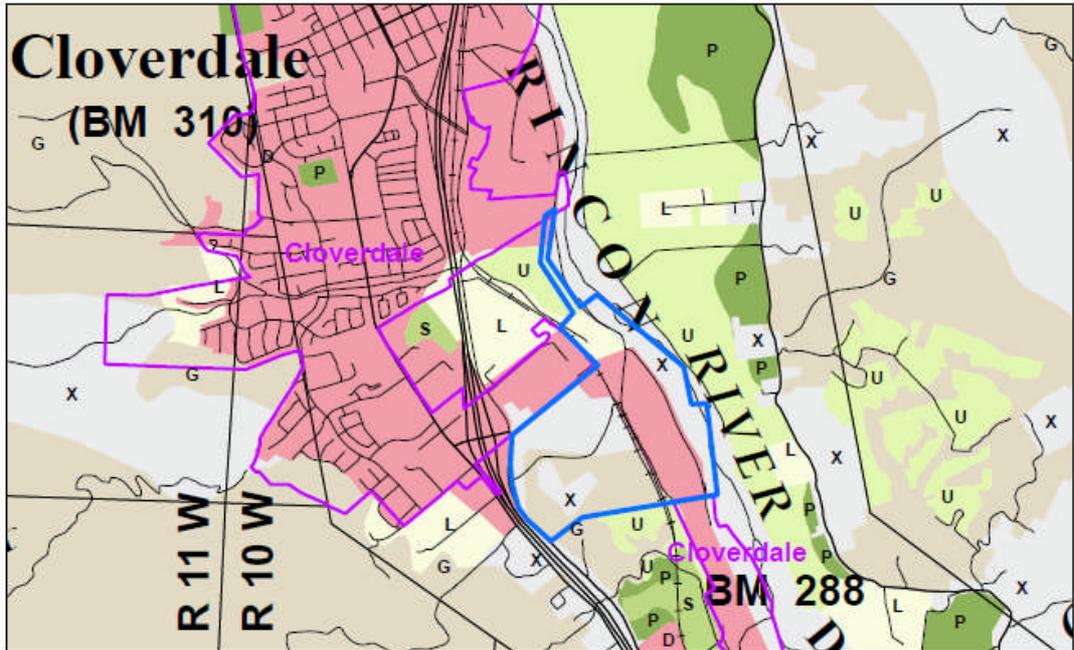
Sincerely,

Robert H. Sexton

Enclosure

Copy: Ms. Nina Regor, City Manager  
Members of the City Council

### Sonoma County Important Farmland 2006



Copyright Department of Conservation, Division of Land Resource Protection, 2006.  
 Map data, categories and statistics are available on the World Wide Web at:  
[www.consrv.ca.gov/dlrp/lrmp/](http://www.consrv.ca.gov/dlrp/lrmp/) or contact the Farmland Mapping and Monitoring  
 Program, 801 K Street, MS 18-01, Sacramento, CA 95814. Phone (916) 324-6500;  
 e-mail: [lrmp@consrv.ca.gov](mailto:lrmp@consrv.ca.gov)

Planning Commission Minutes – November 5, 2008  
Individual Comments from Citizens



Assessment: A DEIR has been prepared. The 45-day public review and comment period for the DEIR began on October 24, 2008 and ends on December 9, 2008. Interested persons are invited to review and comment on the DEIR. Written comments on the DEIR must be submitted to the City of Cloverdale Community Development Department no later than 5:00 p.m. on December 9, 2008.

Director Kibby presented the staff report and a PowerPoint presentation (attached as Exhibit 1). He explained that any comment received at this meeting would be included in the minutes and would be addressed by the consultant. The public can also submit comments in writing.

Chair Jordan opened the discussion to the public. The following represents issues presented by the public that may or may not be considered topic discussion.

Testimony by John Doble, Cloverdale:

- |    |  |      |
|----|--|------|
| I5 | <ul style="list-style-type: none"><li>• The Urban Growth Boundary and General Plan should use the property lines for delineation, otherwise the lines divide lots. He questioned what would happen if there were a remainder lot in the UGB, split by the line, with a portion outside the UGB. In response, Director Kibby noted that type of situation would have to be considered within the UGB Ordinance itself.</li><li>• The Sphere of Influence line should be used as the Urban Growth Boundary line otherwise control is lost by the City.</li></ul> | I5-1 |
|----|--|------|

Testimony by Diane Bartleson, Cloverdale:

- |    |  |      |
|----|--|------|
| I6 | <ul style="list-style-type: none"><li>• She would like to see more specific language about the Urban Growth Boundary within the General Plan that includes a certainty that the Urban Growth Boundary (UGB) will occur.</li><li>• She would like to be assured that the City is protected by residential sprawl during the period of time between the General Plan adoption and adoption of a UGB.</li><li>• She sought a guarantee that the UGB could not be amended once adopted by any means. In response, Chair Jordan explained that until the voters pass a measure it can be amended by Council; however, the City has heard overwhelming input on the UGB from the community and it has been included in the General Plan.</li></ul> | I6-1 |
|----|--|------|

Director Kibby explained that the Council has adopted a resolution approving an Urban Growth Boundary Line. This UGB has been included in the General Plan. The General Plan (GP), by state law, is the constitution for urban development unless amended.

Testimony by Dick Schwartz, Cloverdale:

- |    |   |      |
|----|---|------|
| I7 | <ul style="list-style-type: none"><li>• The City should be pre-zoning properties within the GP Sphere of Influence and UGB boundaries so that it is agreeable with property owners and in doing so consider the affects on properties by the zoning designations.</li><li>• Consider the City's ability to provide infrastructure (water and sewer) to the areas.</li></ul> | I7-1 |
|----|---|------|

Testimony by Melanie Bagby, Cloverdale:

- |    |   |      |
|----|---|------|
| I8 | <ul style="list-style-type: none"><li>• She was glad to see the UGB as part of the DEIR. She would encourage the Ordinance process go forth for approval of a UGB.</li><li>• She noted the importance of concentrating growth, and protecting water supplies.</li></ul> | I8-1 |
|----|---|------|

Testimony by Russ Peihl:

He questioned how the UGB could be included within the General Plan and how it was then represented within the DEIR. Director Kibby and Chair Jordan explained that the City has adopted the UGB by resolution. The first time the UGB will be a policy is with the adoption of the GP. Then the Council can adopt it by Ordinance and/or it can go to the voters as a measure at the time of an election.

19

19-1

Chair Jordan explained that the comment period is open until December 9, 2008. Comments can be received by the City until that time.

**C. Other Business**

**C.1**

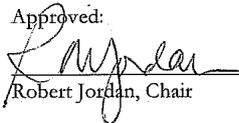
Community Development Director's report by Director Kibby:

There will be a Housing Element Public Work Session November 20<sup>th</sup>. The meeting will be staffed by Housing Staff and is not a Planning Commission meeting.

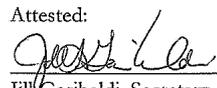
Chair Jordan adjourned the Planning Commission Meeting at 8:10 p.m. to the next meeting, Wednesday, December 3, 2008 at 6:30 p.m., Cloverdale Senior Center, 311 N. Main Street, Cloverdale, CA

These minutes were introduced and adopted by the Planning Commission at their regular meeting December 3, 2008 by voice vote: 5-ayes, 0-noes.

Approved:

  
Robert Jordan, Chair

Attested:

  
Jill Garibaldi, Secretary

CITY OF CLOVERDALE GENERAL PLAN UPDATE  
Final Environmental Impact Report – January 2009  
State Clearinghouse No. 2007082143

## **CHAPTER 3**

### **Response to Comments on the Draft EIR**

**Introduction** - Individual responses to each of the comment letters identified in Chapter 2 “Comments on the Draft EIR” are included in this chapter. Neither the comments on the Draft EIR nor the City’s responses thereto raise any “significant new information” within the meaning of Public Resources Code Section 21092.1 or CEQA Guidelines Section 15088.5 so as to require reirculation of the Draft EIR. Therefore, the City of Cloverdale, as the CEQA Lead Agency, has directed that a Final EIR be prepared. Comments that do not directly relate to the analysis in this document (i.e., that are outside the scope of this document) are not given specific responses. However, all comments are addressed in this chapter so that the City of Cloverdale Planning Commission and City Council will know the opinions of the agencies, organizations, and individuals that provided comments.

In some cases, multiple comments were received with respect to several planning and/or environmental issues raised in the Draft EIR. In order to provide the commenter with a complete picture regarding his or her concern, the City prepared a master response to all comments regarding a given subject. These master responses provide some background regarding the issue, identify how the issue was addressed in the Draft EIR, and provide additional explanation regarding the issue as needed. In some cases, these responses have been prepared to address specific land use or planning concerns related to the Project but unrelated to the EIR or environmental issues associated with the Project. Comments which present opinions about the project unrelated to environmental issues or which raise issues not directly related either to the substance of the EIR, the General Plan Update, or to environmental issues are noted without a detailed response.

#### **Response to Comments**

The following responses correspond to the numbers for each comment presented in Chapter 2 “Comments on the Draft EIR”. This section begins with the master responses that have been prepared to address multiple comments related to a single given subject.

### **Master Response #1: Comments Related to the General Plan Update Document**

During the public review period for the draft EIR, several respondents provided a variety of comments related to planning concepts and updates (i.e., Urban Growth Boundary, etc.) proposed in the City's Updated General Plan. This master response has been developed to address various comments related to the General Plan Update policy document.

The primary objective of this final EIR is to respond to comments received during the public review period that address concerns specific to environmental impacts of the Proposed Project or the adequacy or completeness of the draft EIR analysis. Not surprisingly, given the broad nature and multiple functions of a General Plan, not all comments received in response to the draft EIR were environmental in character. CEQA does not require a formal response to such comments, even though they may well address legitimate concerns of public policy (e.g., economic, fiscal, or social issues). Some comments merely express approval or disapproval of the Proposed Project or particular policies. Some comments criticize the Proposed Project from a policy standpoint, or characterize it in negative terms, but do not argue that the draft EIR is in any way deficient. Still other comments offer suggested changes to proposed new policy language. All such comments are part of the administrative record for the General Plan process, and all will be forwarded, as part of this final EIR, to City decision-makers for their careful consideration, as, in weighing the various benefits and detriments associated with the Preferred Alternative and the other alternatives, these decision-makers have to balance economic, social, fiscal, and other concerns against the environmental impacts of the various options.

### **Master Response #2: Programmatic Nature of the EIR**

Several comments received regarding the draft EIR provided requests to have additional impact analysis provided regarding specific developments that may occur through implementation of the proposed Cloverdale General Plan Update. This master response has been developed to address various comments.

According to CEQA Guidelines Section 15168(a), a local agency may prepare a program-level EIR to address a series of actions that can be characterized as one large project and are related geographically, as logical parts of a chain of contemplated events, through rules, regulations, or plans that govern the conduct of a continuing program, or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways. This EIR was prepared as a Program EIR. As a Program EIR, this document serves as a first-tier document that assesses and documents the broad environmental impacts of a program with the understanding that a more detailed site-specific environmental review may be required to assess future projects implemented under the program. As individual projects with specific site plans and facilities are planned, the City will evaluate each project to determine the extent to which this EIR

covers the potential impacts of the project and to what extent additional environmental analysis may be required for each specific future project. (See Public Resources Code

It is also important to note that the City’s draft General Plan Update, Policy LU 1-2, calls for the establishment of a growth management program based upon a maximum anticipated City population of 12,000 residents within 4700 housing units through the buildout horizon of the General Plan Update. This is a reduction in the total population which would have been allowed under continuation of the existing General Plan.

**Master Response #3 Agricultural Land**

Several comments from agencies and organizations focused upon the potential conversion of agricultural lands within the project area over the planning horizon of the General Plan. This Master Response has been developed to address these comments. Implementation of the proposed project would affect 484.4 acres of Farmland in the Study Area. Table 4-2-6 in the DEIR identifies 484.4 acres of significant farmland (Prime Farmland, Unique Farmland, and Farmland of Statewide Importance as identified in the California Department of Conservation Farmland Mapping and Monitoring Program [FMMP]) within the General Plan Study Area. Based on EIR comment 14-10 and public hearing comments on February 4, 2009, two parcels in the Study Area are not significant farmland (16.8 acres in Alexander Valley Resort and 16.1 acres in the McCray Road area to be removed from the Farmland Mapping and Monitoring Program per Department of Conservation Staff); therefore, the revised acreage of significant farmland within the Study Area is 451.5 acres. There are 29 acres of significant agricultural land within the proposed Urban Growth Boundary (northeast of the existing City limits and Highway 101) which are designated as Conservation Features. That land also has Williamson Act designation. That 29 acre property is within the Urban Growth Boundary, and the General Plan could be amended to change potential use, following the normal General Plan policies, including environmental review. With the exception of the 29 acre site, the remaining areas of significant farmland will be designated as Conservation features and are outside of the Urban Growth Boundary. As such, they cannot be developed and will be preserved under an agricultural designation after annexation to the City. Conservation Features land outside the UGB cannot be changed to non-agricultural uses.

The following proposed General Plan Policies and Implementation Measures provide mitigation of this item:

General Plan Policy	Implementation Measure
<p><b>Policy LU 3-1.</b> Develop an Urban Growth Boundary that allows urban development within the boundaries and does not allow urban development outside the boundaries except in two existing developed areas (Industrial and Asti Exception Areas). Urban development should be within the General Plan Study Area</p>	<p><b>Implementation LU 3-1.a.</b> Prepare an Urban Growth Boundary to be passed by the voters substantially as shown in Exhibit 2.5.</p> <p><b>Implementation LU 3-1.b.</b> Land outside the Urban Growth Boundary shall be retained as Conservation Features, except for the Industrial</p>

General Plan Policy	Implementation Measure
<p>and below the "Base of Hill" as defined in Exhibit 2.2., except for the area to the south of Sandholm Lane extended and north of Bluxom Creek, where development may be allowed above the base of hill but behind the hill if the primary access road visible to the City is below the base of hill, and houses, night lighting, street lighting, and roadways above the base of hill are not visible from the balance of the City.</p>	<p>and Asti Exception Areas.</p> <p><b>Implementation LU 3-1.c.</b> The City shall develop a list of exception uses allowed outside the Urban Growth Boundary, including industrial uses in the Industrial Exception Area, Destination Commercial Uses in the Asti Exception area, and conservation uses in all other areas outside the Urban Growth Boundary. The conservation uses shall allow relocation of the Citrus Fair as an exception.</p>
<p><b>Policy LU 3-3</b> Maintain the compact form and natural setting of Cloverdale by protecting hillsides, protecting land outside the Urban Growth Boundary from urban development, and protecting Prime Farmland, Unique Farmland, and Farmland of Statewide Importance from urban development, with conditions that allow for economic and rational infill growth.</p>	<p><b>Implementation LU 3-3.a.</b> Land outside the Urban Growth Boundary shall be retained as Conservation Features, except for the Industrial and Asti Exception Areas, which have no farmland of statewide significance. Land shown as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance shall be retained as Conservation Features, except that specific parcels identified in Exhibit 2.6 may be changed to urban uses if equivalent lands are placed in a land trust within Sonoma county for permanent and equivalent agricultural use.</p> <p><b>Implementation LU 3-3b.</b> The City, in coordination with Sonoma County, shall consider implementing a requirement that future development projects adjacent to designated agricultural lands under the Conservation Features designation will maintain a buffer between the proposed development and agricultural operations. The width of the buffer, the allowable land use activities, and a mechanism for maintenance of the buffer shall be part of any implementing action of the requirement.</p>
<p><b>Policy CDO 1-1.</b> Urban development in the City will be on the valley floor, defined generally as the land below the Base of Hill. Development will be framed by and contained within agricultural lands to the north and south, the Russian River to the east, and below the Base of Hill (defined as the location where the valley floor transitions to a 20% slope or greater using 5 foot slope contours or less) on hillside areas).</p>	<p><b>Implementation CDO 1-1.a.</b> Use Policy CDO-1 as basis for project review in the City.</p> <p><b>Implementation CDO 1-1.b.</b> Adopt an Urban Growth Boundary (see <b>Policy LU 3-1</b> above).</p>
<p><b>Policy CDO 1-2.</b> "Conservation Features" areas to the north and south of the City should be reserved for agricultural use unless a Specific Plan is prepared and the General Plan is amended for other uses. "Conservation Features" areas in hillsides to the west of the City shall be reserved for protection of forested hillsides.</p>	<p><b>Implementation CDO 1-2.a.</b> Require specific plans as described in Policy CDO 1-2.</p>
<p><b>Policy CDO 1-5.</b> Encourage the County to retain surrounding lands in very low density residential, agricultural, open space, and natural resource uses that provide contrast to urbanized Cloverdale.</p>	<p><b>Implementation CDO1-5.a.</b> Use Policy CDO 1-5 as guidelines for annexation review.</p>

General Plan Policy	Implementation Measure
Promote the creation of a community separator or open space buffer between Cloverdale and any urban development around the City.	

As described in Master Response #2, the Draft EIR for the Proposed Project is a program level document that evaluates the effects that growth within the City’s General Plan Update Study Area may have on a variety of resources, including agricultural. Because some amount of growth is anticipated and is unavoidable to a certain extent as described in the DEIR, there is an expectation that some amount of agricultural land will be converted in the future. The City will work to conserve and protect agricultural lands on a project by project basis as described in the DEIR and reiterated above. The City will continue to coordinate and cooperate with Sonoma County with respect to this effort. The City’s General Plan land use designation of *Conservation Features* is very similar to the existing County land use designations outside of the City’s jurisdiction.

Certain comments received called for additional General Plan policy language which would address the issue of agricultural land conversion in the future. Those comments are addressing the City’s policies which may be adopted after the UGB has expired, at least 20 years in the future. That time frame is outside the proposed General Plan time frame, approximately 20 years, and policies are not proposed beyond the General Plan time frame.

**Master Response #4 Urban Growth Boundary**

Comments were received relative to the proposed future adoption of an Urban Growth Boundary (UGB) as described in the City’s General Plan Update. This master response has been developed to address this issue.

For planning purposes, the City selected a study area for the General Plan Update. The Draft EIR analyzes potential impacts upon the study area, as well as smaller areas considered in the “Alternatives” analysis. The study area is larger than the City limits, the City’s Sphere of Influence (SOI), the Proposed Sphere of Influence, and the proposed Urban Growth Boundary (UGB). The study area does not conform to any other existing boundary formally adopted by the City or Sonoma County. It is recognized that the City does not have direct authority over portions of the study area, however, the study area does impact and reflect upon the City’s identity and was therefore given planning consideration. The study area encompasses 7.8 square miles (5000 +- acres) and extends generally east to the edge of the Russian River and west to the crest of the ridgeline and south to Asti and the Raines Creek Water District. Highways 101 and 128 are a part of the study area as well as the City Municipal Airport. The northern boundary extends to the north Highway 101 interchange and includes the McCray Road area.

The General Plan planning area includes four separate geographical areas. These are:

**City Limits:** The legal boundaries of the community, where land use is controlled by the City. They encompass 2.5 square miles (1,615 acres).

**Sphere of Influence:** The City Sphere of Influence (SOI) is the area of the City that has been approved for future annexation by the Sonoma County Local Agency Formation Commission. It encompasses 2.3 square miles (1,460 acres) beyond the City Limits. The Sphere of Influence has remained generally consistent since the adoption of the first General Plan in 1978, with only one extension approved since the original General Plan was adopted in 1978. The Sonoma County General Plan uses the Sphere of Influence to define the ultimate area to be annexed to the City.

**Proposed Sphere of Influence:** The Proposed Sphere of Influence (PSOI) is the area where the City anticipates extending urban services (e.g. water, sewer, police, etc.) It encompasses 2.2 square miles (1391 acres) beyond the Sphere of Influence and represents area that the City intends to add to the Sphere of Influence after Local Agency Formation Commission approval.

- **Study Area:** The City's General Plan Update Study Area encompasses 0.8 square miles (511 acres) outside of the existing and proposed Sphere of Influence and can be considered the areas under County jurisdiction where the City expresses land use directions to help the County determine transition policies between the urban City areas to the agriculture and very low intensity uses under County jurisdiction.

The DEIR project included a policy calling for the eventual designation and adoption of an Urban Growth Boundary (UGB). Based upon several issues identified during the preparation of the DEIR, the City Council chose to adopt a UGB and include a map depicting the approximate location of the proposed line. The intent of the City Council was to utilize the UGB as part of the General Plan Update policy mitigation program. It is recognized that the CAC did not define the UGB as a specific study area for EIR purposes. The General Plan Update document was modified in September 2008 by the Cloverdale City Council. The Council chose to identify a UGB and two exception areas within which the City may review future requests for urban-type uses and/or extension of City services. The UGB includes the existing City limits and portions, but not all, of the Existing Sphere of Influence and the Proposed Sphere expansion area. In other words, the proposed UGB is smaller than the Study Area upon which the General Plan Update DEIR was based, and therefore potential program level environmental impacts assessed in the DEIR necessarily include the identified UGB area.

The draft General Plan Update document contains an implementation measure calling for the adoption of a UGB ordinance (within 6 months of the GPU adoption) to be placed on the ballot for voter approval. A map has been included in the General Plan Update (Exhibit 2.5) depicting the City-proposed approximate UGB area. The area was selected in order to help fit growth into the community's natural environment and protect important natural, social and cultural resources. Furthermore, the City has determined

that the UGB can aid the community to more efficiently and cost effectively to provide a public and community infrastructure to support future growth and development. The City has determined its appropriate growth boundary and has studied the impacts of development within and adjacent to the identified Urban Growth Boundary as part of the General Plan EIR.

Comments were received relative to the City's proposed Urban Growth Boundary and its effectiveness as mitigation with respect to agricultural land conversion. Table 4-2-6 in the DEIR identifies 484.4 acres of significant farmland (Prime Farmland, Unique Farmland, and Farmland of Statewide Importance as identified in the California Department of Conservation Farmland Mapping and Monitoring Program [FMMP]) within the General Plan Study Area. Based on EIR comment 14-10 and public hearing comments on February 4, 2009, two parcels in the Study Area are not significant farmland (16.8 acres in Alexander Valley Resort and 16.1 acres in the McCray Road area to be removed from the Farmland Mapping and Monitoring Program per Department of Conservation Staff); therefore, the revised acreage of significant farmland within the Study Area is 451.5 acres. There are 29 acres of significant agricultural land within the proposed Urban Growth Boundary (northeast of the existing City limits and Highway 101) which are designated as Conservation Features. That land also has Williamson Act designation. That 29 acre property is within the Urban Growth Boundary, and the General Plan could be amended to change potential use, following the normal General Plan policies, including environmental review. With the exception of the 29 acre site, the remaining areas of significant farmland will be designated as Conservation features and are outside of the Urban Growth Boundary. As such, they cannot be developed and will be preserved under an agricultural designation after annexation to the City.

. It is recognized that the City must follow LAFCO policies and regulations prior to expanding the City's Sphere of Influence (SOI) and prior to any annexation. LAFCO approval of any future proposed. The LAFCO and other comments question whether the General Plan Environmental Impact Report reviewed the potential for development on Conservation Features areas outside the Urban Growth Boundary. The above paragraph explains that the Conservation Feature land outside the UGB can only be preserved for agricultural uses. The General Plan and the General Plan Environmental Impact Report fully analyzed the impacts of development outside the existing City limits and for the areas proposed for SOI expansion.

The City will continue to coordinate with the County to ensure that appropriate consideration is given to "greenbelt" areas as part of the planning process associated with any future expansions of the City. Community separator protections to lands around Cloverdale will be supported by the proposed General Plan Update document goals, policies, and implementation measures. With the exception of two precisely mapped exception areas, the land outside the Urban Growth Boundary are designated for Conservation Features, which is consistent with protection of agricultural lands in this vicinity.

The following GPU Goals, Policies, and Implementation measures are applicable to this issue: LU 3; LU 3-1; LU 3-1.a; LU 3-1.b; LU 3-1.c; LU 3-2; LU 3-2.a; LU 3-2.b; LU 3-3; LU 3-3.a; and LU 3-3.b.

## **Individual Responses – Public Agencies**

### **Letter A1. Department of Fish and Game**

#### **Response to Comment A1-1:**

The commenter states that the City should review future development projects to ensure that rare or sensitive species are not impacted.

The City concurs with this comment as is reflected in the DEIR and in the Draft General Plan Update document. General Plan Update policies and Implementation Measures CDO 5-1, CDO 5-1.a, CDO 6-2, CDO 7-1, CDO 7-1.a, CDO 7-2, CDO 7-2.b, CDO 7-2.c, and CDO 7-2.d would reduce and/or avoid direct and indirect impacts to special-status species within the study area. *[It would be more in line with CEQA principles to briefly identify each policy listed and state each policy will reduce impacts – the factual connection is important for public review purposes.]* If this is done on the chart above, does it need to be done every time the policies are mentioned? Environmental review procedures adopted as part of the General Plan Update will ensure that adequate mitigation measures will be identified for future projects that will achieve “no net loss” of sensitive habitat acreage, values, and function.

#### **Response to Comment A1-2:**

The commenter states that future project scoping should include consultation with the DFG’s Natural Diversity Database.

The City recognizes that consistent with existing State regulations, biological surveys may be required in certain instances. The potential for special-status species to occur within the study area was evaluated by querying the CNDDDB (CDFG 2007), the USFWS (2007a), and the CNPS (2007) for previously recorded occurrences of special-status species within the *Cloverdale, California* USGS 7.5-minute quadrangle (USGS 1960) and surrounding eight quadrangles (Asti, Geyserville, Warm Springs Dam, Tombs Creek, Big Foot Mountain, Yorkville, Hopland, and Highland Springs).

CDFG maintains records for the distribution and known occurrences of sensitive species and habitats in the CNDDDB. The CNDDDB is organized into map areas based on 7.5-minute topographic maps produced by USGS. The CNDDDB is based on actual recorded occurrences, but does not constitute an exhaustive inventory of every resource. The absence of an occurrence in a particular location does not necessarily mean that special-

status species are absent from that area, but that no data has been entered into the CNDDDB inventory. Detailed field surveys are generally required to provide a conclusive determination on presence or absence of sensitive resources from a particular location where there is evidence of potential occurrence. Comment noted.

**Response to Comment A1-3:**

DFG recommends additional mitigation be added to the GPU in support of Policy CDO 6-2.

The City intends upon adopting the following relevant policies and implementation measure, which in the opinion of the City, adequately address this concern:

*Policy CDO 6-2: Protect distinctive natural vegetation such as oak woodlands, riparian corridors and mixed evergreen forests by maintaining the natural features as a whole. Preservation of individual trees or features rather than the larger habitat does not satisfy this policy. (See Implementation CDO 6-1.a).*

*Policy CDO 6-1 - Maintain and expand the tree canopy within and outside the developed areas of the City, and including old growth and newly planted trees. Prepare tree protection standards that can be implemented with or without a tree preservation ordinance.*

*Implementation CDO 6-1.a - Develop an urban forest plan with a management strategy for maintaining existing and newly planted trees, including best practice provisions for installation, maintenance, and succession planning.*

**Response to Comment A1-4:**

The DFG addresses proposed setbacks from waterways, and recommends that waterways which are located outside of the be protected as well. In addition, DFG recommends that the City consider extending the proposed 50 foot setback (50' on each side of the waterway, totaling 100') to 100 feet on each side of a waterway (totaling 200') Note that the Conservation Element Map referenced in the DFG letter is in the 1992 General Plan and will be added to the proposed General Plan.

In response to the above issue, the City's setback requirement will be applied in areas over which the City has jurisdiction. Most of the waterways within the proposed UGB are on existing city lots which would be unusable if a 100 foot setback were adopted, raising constitutional issues regarding private property rights. With respect to expansion of the waterway setback area, the GPU recognizes that larger setbacks may be appropriate for land adjacent to the Russian River as is reflected in the City's *Conservation Features* land use designation which reads as follows:

*The purpose of this designation is to manage and preserve valuable biological, visual, and agricultural resources in the Cloverdale Planning Area. Primary uses include river/stream-related recreation, open space buffers, and agricultural production.*

*Setbacks of 50 feet from tributaries are encouraged, and between 300 feet to 1,000 feet around the Russian River.*

The *Conservation Features* land use designation encompasses much of the land in the vicinity of the Russian River, and along the western portion of the planning area hillsides. This designation is proposed to be applied to approximately 1875 acres within the GPU Planning Area, almost 37% of the total planning area. Increased waterway setbacks within the already urban developed City area is not feasible in many cases given existing parcel sizes. Many parcels do not contain adequate area to accommodate such a setback, and imposing one would raise constitutional issues regarding private property rights.

## **Letter A2. Department of Transportation**

### **Response to Comment A2-1:**

The commenter recommends including a casino/hotel complex proposed by the Cloverdale Rancheria of Pomo Indians in the General Plan Update's traffic study and evaluation of the adequacy of General Plan transportation improvements.

The City's Notice of Preparation for the General Plan Update EIR was published on August 29, 2007. Almost a year later, a Notice of Intent to Prepare an EIS for the Proposed Cloverdale Rancheria of Pomo Indians Fee-to-Trust Acquisition and Hotel-Casino Project, Sonoma County, California, was published in the Federal Register. On July 20, 2008, a public scoping meeting on the EIS was held, but contrary to normal process, no project details were presented on broadly identified alternative, including no project, an unspecific non-gaming revenue generating alternative, a casino of several sizes with some type of hotel-entertainment complex and a casino without an associated hotel.

At that meeting, the EIS consultant for the project noted, "Right now there is not a proposed project that has been defined." The City as well as other agencies and members of the public rightly objected to the lack of detail as placing the burden on the public to analyze the potential environmental impacts before a project was defined.

In August, 2008, the City accepted cooperating agency status in the Bureau of Indian Affairs BIS process, as part of its continuing attempts to require the tribal project to fully identify, analyze and mitigate potential impacts of any future project that may be proposed. Although a draft EIS for the casino project has not yet been published, the City understands that it will analyze projected traffic impacts on local City streets and the U.S. 101 interchanges at the South Cloverdale interchange and Citrus Fair Drive. The City expects that the BIA EIS process will require inclusion of project elements, such as design and/or infrastructure improvements, which will accommodate traffic generated by a casino project, if one is ultimately undertaken. The public will have a full opportunity to be informed and comment on the analysis of casino traffic impacts presented in the federal EIS process.

Although the City's input as a cooperating agency is entitled to be considered in the EIS process, the City ultimately has no power to either require modifications in the project or to reject the project if its impacts are deemed unacceptable.

CEQA Guideline Section 15130(b) states that the discussion of cumulative impacts in an EIR "should be governed by standards of practicality and reasonableness." At the time the City prepared its traffic study for the General Plan, it had no way of even estimating the size, scope and nature of a casino project, nor was there sufficient information to determine the likelihood that a project, of whatever size and scope, would proceed, unlike two previous tribal proposals which did not advance.

The City is taking all possible action to have an active voice on behalf of its citizens in the federal environmental review process now underway for a possible casino or other tribal project. It is neither practical nor reasonable to expect the City, as a small jurisdiction of some 8,500 residents and limited economic resources, to duplicate the federal environmental review process and/or to identify, much less fund and provide infrastructure improvements which will mitigate cumulative impacts from a possible future project of a sovereign tribal entity.

**Response to Comment A2-2:**

The commenter suggests early consultation with Caltrans regarding proposed roundabouts.

In response, based on the traffic projections evaluated for the General Plan update, the need for the roundabouts may not occur for at least 5-7 years or longer, depending on the pace and location of development. Initial layouts and the operational analysis using the SIDRA software are available in the technical appendix.

**Response to Comment A2-3:**

The commenter recommends early consultation with Caltrans regarding the alternative of signalized intersections at South Interchange.

In response, the City agrees. The operational analysis for the signalized intersection alternatives is available in the technical appendix.

**Response to Comment A2-4:**

The commenter raises potential issues associated with the SMART rail and TOD development:

In response, the City acknowledges the comment. The traffic analysis did not take any deductions for potential traffic benefits of transit oriented development. Policies which promote more mixed use and transit oriented development would reduce traffic from levels which are projected in the traffic analysis.

**Response to Comment A2-5:**

The commenter requests that they be provided with intersection analysis output.

In response, the City notes that the results of the HCM and SIDRA analysis are available in the DEIR technical appendix.

**Letter A3. Sonoma LAFCO**

**Response to Comment A3-1:**

The commenter raises the issue of a self-mitigating General Plan.

Early in the process, the City made the decision to prepare a self-mitigating document thusly avoiding the need and possible ineffectiveness of a lengthy list of mitigation measures and associated monitoring requirements. The draft General Plan was formulated to minimize environmental impacts, with the goal that adoption of the General Plan would be the primary mitigation of impacts identified in the Environmental Impact Report. During the DEIR process, the General Plan Update document was modified to address environmental concerns which became apparent but have now been mitigated through effective policy and implementation programs. (See Revised GPU, September 2008)

**Response to Comment A3-2:**

The commenter requested additional explanation related to the proposed Urban Growth Boundary as shown in the draft General Plan Update document dated September 2008. Additionally, LAFCO questions the connection between the existing City limits and the Asti exception areas. The Urban Growth Boundary contains two exception areas which would be established outside the UGB and could be served by City services for a precisely defined and limited set of land uses. In order to provide services to the exception areas, those areas would have to be annexed, as well as the intervening lands which would be designated as Conservation Features. Therefore the Sphere of Influence is proposed to extend to the Asti exception area. Because of the precise and defined uses in the UGB, the Conservation Features could only be used for agricultural uses, preserving the important farmlands as required by LAFCO regulations, and the pre-existing developed industrial and winery use in the exception areas could be served for industrial and winery uses.

See also Master Response #4, Urban Growth Boundary.

**Response to Comment A3-3:**

The commenter expressed a concern regarding the conversion of prime agricultural lands to urban uses, and possible future conflicts associated with this situation.

See Master Response #3, Agricultural Land, and Response to Comment A3-2. The conversion of agricultural land to urban uses would be prohibited by the Urban Growth Boundary provisions. Public utilities would be extended to areas adjoining those agricultural lands to provide service to well-defined exception areas, but those utilities would not be available to agricultural lands for urban uses for the twenty year period of the UGB.

**Response to Comment A3-4:**

The commenter recommends that specific properties under Williamson Act contract be identified.

The City will include a map as part of the FEIR which will identify contracted lands, and provide an acreage summary. Impacts are not anticipated to change, see Master Response #3, Agricultural Land, which addresses potential agricultural land conversion issues in detail and response A4-5, which details the Williamson Act parcels within the proposed UGB.

**Letter A4. Sonoma County PRMD**

**Response to Comment A4-1:**

The commenter notes that references in the Cloverdale GPU DEIR to the “Draft Sonoma County General Plan” should be changed to “GP2020” as the County General Plan has been adopted

Commented noted and the City concurs.

**Response to Comment A4-2:**

Commenter notes that the City of Windsor was omitted from the DEIR Section 4.1.1.

Commented noted and the City concurs.

**Response to Comment A4-3:**

The commenter expresses concern that the proposed UGB is not contiguous to the City limits.

See Master Response #4, Urban Growth Boundary. Also, the UGB includes lands within the General Planning area, not just the City limits. The General Plan is a 20-year document and anticipates changes within that 20-year period. It should be noted that the General Plan does not anticipate annexation of non-contiguous properties (see response A3-2).

**Response to Comment A4-4:**

The commenter expresses concern regarding the potential for agricultural land conversions.

See Master Response #3, Agricultural Land and response A3-2

**Response to Comment A4-5:**

The commenter expresses concern over the location of Williamson Act properties and potential future extension of public facilities/services through areas designated as *Conservation Features*. The commenter recommends adding policy to the GPU which states that the extension of public water and sewer service would only be allowed in conjunction with the resolution of a public health hazard or the provision of affordable housing.

There are three Williamson Act Properties within the UGB, a 29.0 acre parcel north of the existing City limits and 10.8 and 16.8 acre parcels south of the City wastewater treatment plant. The 10.8 acre parcel has a cancellation request. The other two are in *Conservation Features* designation and are not anticipated for urban development in the General Plan time frame.

**Response to Comment A4-6:**

The commenter makes recommendations for Transportation Policies

The City acknowledges this comment. It relates to policy issues, rather than environmental issues. The City may take action in concert with the County and other Sonoma County Cities, but those potential policies have not been analyzed in sufficient depth to place them in the General Plan.

**Letter A5. California Regional Water Quality Control Board – North Coast Region  
Response to Comment A5-1:**

The commenter expresses concern that there are not enough enforceable mitigation measures built into the General Plan Update or provided in the DEIR to address potential impacts to surface and ground water quality, loss of riparian habitats and wetlands, and storm water pollution. The commenter notes that the RWQCB has regulatory/permitting authority over individual storm water and waste water discharges, but the Agency prefers local jurisdictions to incorporate mitigation addressing these items at a local level. The RWQCB recommends more clear and enforceable mitigations be developed as part of this planning process.

In response , the City notes as explained in the Regulatory Framework section of the DEIR that industrial activities in Cloverdale which discharge storm water are subject to a

NPDES General Industrial Permit for such discharges (Water Quality Order No. 97-03-DWQ). This permit requires the implementation of management measures that will achieve the performance standard of best available technology (BAT) economically achievable and best conventional pollutant control technology (BCT). The General Industrial Permit also requires the preparation of a Storm Water Pollution Prevention Plan (SWPPP), a monitoring plan and an annual report.

As described above, the NPDES program includes a permitting process for construction work. Under the NPDES General Construction Permit (NPDES No. CAS000002, Order No. 99-08-DWQ) process, projects that disturb one or more acres of lands are required to obtain a permit before the start of construction work. Typically, the permit attaches conditions that include the preparation of a SWPPP. The SWPPP describes the best management practices (BMPs) that would be employed to prevent loosened soils carried by storm water runoff from entering local streams and other water bodies.

Certain actions within the General Plan Study Area may need to conform to a General Permit for dewatering and other low threat discharges to surface waters (Water Quality Order No. 5-00-175). This General Permit allows such discharges provided that they do not contain significant quantities of pollutants and are either (1) four months or less in duration, or (2) the average dry weather discharge does not exceed 0.25 million gallons per day (mgd). Activities that may require the acquisition of this permit include well development water, construction dewatering, pump/well testing, pipeline/tank pressure testing, pipeline/tank flushing or dewatering, condensate discharges, water supply system discharges, and other miscellaneous dewatering/low threat discharges.

“Waters of the State” are defined by the Porter-Cologne Act as “any surface water or groundwater, including saline waters, within the boundaries of the state.” The RWQCB protects all waters in its regulatory scope, but has special responsibility for wetlands, riparian areas, and headwaters. These water bodies have high resource value, are vulnerable to filling, and are not systematically protected by other programs. RWQCB jurisdiction includes “isolated” wetlands and waters that may not be regulated by the Corps under Section 404. “Waters of the State” are regulated by the RWQCB under the State Water Quality Certification Program which regulates discharges of fill and dredged material under Section 401 of the Clean Water Act and the Porter-Cologne Water Quality Control Act.

Streams and lakes, as habitat for fish and wildlife species, are subject to jurisdiction by the California Department of Fish and Game under Sections 1600-1616 of the State Fish and Game Code. Alterations to or work within or adjacent to streambeds or lakes generally require a 1602 Lake and Streambed Alteration Agreement.

GPU policies and implementing actions LU 3-2, LU 3-2.a, LU 3-2.b, CDO 7-1, CDO 7-1.a, CDO 7-1.b, and CDO 7-1.c would reduce the amount of sediments that enter streams and other water bodies through the use of best management practices to control soil erosion and to trap sediments, the incorporation of other measures deemed necessary by

the City to reduce generation of sediments, and enforcement of provisions of a grading and erosion control ordinance. Implementation of the proposed GPU policies and action items, in conjunction with adherence to the provisions of the NPDES General Construction Permit requirements, when applicable, adequately address the concerns regarding this issue as expressed by the RWQCB.

The following mitigation measures are part of the DEIR and contain enforceable and direct language regarding project mitigation:

**MM 4.9.1** The City will adopt and implement a Storm Drainage Master Plan. Development projects will be evaluated for consistency with this plan. The plan will identify drainage facilities that will be constructed to eliminate drainage problems in the City and describe the means for financing the improvements. The Storm Drainage Master Plan will address Regional Water Quality Control Board water quality standards, including Best Management Practices for storm drainage management.

**MM 4.9.2** At the discretion of the City Engineer, new development may be required to provide documentation to the satisfaction of the City engineer that the cumulative rate of peak runoff does not exceed pre-development levels. New development and redevelopment of existing sites maybe required to provide storm water detention or retention facilities (on- or off-site), if necessary, to prevent flooding due to runoff or where existing storm drainage facilities are unable to accommodate increased storm water drainage.

**MM 4.9.3** The City will review and revise its Subdivision Ordinance as needed to incorporate specific data and design requirements related to storm water drainage that are contained in this General Plan update.

Mitigation Measure MM 4.9.1 requires preparation of a Storm Drainage Master Plan that identifies drainage facilities needed to reduce or eliminate drainage problems as well as require the use of Best Management Practices that will eliminate or reduce the discharge of pollutants from construction sites to waters of the state and implement stormwater pollution prevention plans that document the selection and implementation of Best Management Practices for a particular construction project. Mitigation Measure MM 4.9.2 sets a City standard for future development related to storm water runoff – the cumulative rate of peak runoff must not exceed pre-development levels. This will limit the generation of higher peak runoff flows resulting from development, which could produce higher velocities for flow, which in turn increase erosion and sediment discharge. Best Management Practices, energy dissipation measures, stabilization measures, and onsite detention ponds can be applied to and incorporated into proposed development to limit the concentrations of these constituents in any site runoff that is discharged into downstream facilities. Mitigation Measure MM 4.9.3 requires that storm water data and requirements be included in the City’s Subdivision Ordinance.

### **Response to Comment A5-2**

The commenter states that the DEIR only considers three creeks, and the Russian River, to be significant within the Study Area.

As stated in the DEIR, the water types consist of potential jurisdictional waters of the U.S. including seasonal wetlands, ponds, ephemeral drainages, and intermittent to perennial streams/rivers that occur within the study area. DEIR Figure 4.10-2 illustrates the known wetlands and streams present within the study area and vicinity. This figure is not meant to be a comprehensive account of all waters, including wetlands, within the study area. Additional wetland features are likely to exist in the study area. Wetlands and waterways were identified using the online *National Wetlands Inventory* (USFWS 2007b). Waters of the U.S. identified in the *Cloverdale Alexander Valley Resort Specific Plan DEIR* (Baseline Environmental Consulting 2004) and the *Clover Springs Phase 3B Environmental Constraints Study* (ESA 2004) were also incorporated into this figure.

The City notes the comment by RWQCB and will revise the Draft EIR to include a clarifying statement that there are other creeks, drainages, etc in the Study Area in addition to the four listed in the current DEIR. (See underlined text below).

#### *DEIR Section 4.9.1 - Existing Setting: Local Surface Water Features*

*The City of Cloverdale is located in the Alexander Valley Groundwater Basin. The Study Area includes one (1) major river, the Russian River, and three (3) significant creeks, Cloverdale Creek to the north, Porterfield Creek to the south, and Cherry Creek near central Cloverdale. There are also other creeks and drainages existing within the Study Area which carry varying degrees of water and support a range and variety of wildlife habitat.*

### **Response to Comment A5-3**

The commenter states that the Russian River is listed on the Regional Water Board's 303(d) list as impaired due to excess sediment and elevated temperature. The commenter also notes that the proposed General Plan Update would allow for an increase in urban development, which in turn would generate increased storm water runoff carrying various pollutants to waterways.

The City's DEIR addresses this issue in several sections of the document as highlighted below:

*DEIR Section 4.9.1 – Existing Setting: Surface Water Quality. The primary surface water body that passes through Cloverdale is the Russian River. The entire length of the Russian River is listed by the State Water Resources Control Board (SWRCB) as impaired by sediment and temperature. These impacts are related to the sources as described below, and are not necessarily related to any specific land-use activities within the City of Cloverdale. The City of Cloverdale does not currently have an individual permit for discharge of storm water, but it is a member of the Russian River Watershed*

*Association, which is an association of nine cities, counties and special districts in the Russian River Watershed that coordinates regional programs for clean water, fisheries restoration and watershed enhancement.*

*Sediment impacts in the Russian River and its tributaries prompted listing the entire Russian River watershed with sediment issues stemming from the following probable sources:*

Agriculture	Disturbed Sites (Land Develop.)	Flow Regulation/Modification	Channel Erosion
Agriculture-storm runoff	Hydromodification	Habitat Modification	Erosion/Siltation
Logging Road Construction/Maintenance	Channelization	Removal of Riparian Vegetation	Nonpoint Source
Construction/Land Development	Dam Construction	Streambank Modification/Destabilization	
Highway/Road/Bridge Construction	Upstream Impoundment	Drainage/Filling Of Wetlands	

*Temperature impacts in the Russian River and its tributaries prompted listing the entire Russian River watershed with temperature issues stemming from the following probable sources:*

Hydromodification	Flow Regulation/Modification	Removal of Riparian Vegetation	Nonpoint Source
Upstream Impoundment	Habitat Modification	Streambank Modification/Destabilization	

Additionally, it is important to note that development potential under the proposed General Plan Update is less than the current development potential under the existing General Plan. The General Plan Update in and of itself will not lead to an increase of urban development as compared to the existing General Plan, the “no project” as analyzed in the DEIR.

Several other responses included within this FEIR address this item, including: Master Response #2; and Individual Responses A1-1; A1-3; A1-4; A3-1; and A5-1.

**Response to Comment A5-4**

The commenter states that creek maintenance for flood control should recognize the need to keep sufficient shade canopy over the creek. The commenter notes that “encouraging cooperation” with other agencies is an inadequate approach to meeting objectives set forth in the General Plan.

The City emphasizes that as mentioned above in several instances, the City’s DEIR and General Plan Update document recognizes the importance of waterways which may be impacted by the project. The land area subject to inundation by the base flood is referred to as the "100 year floodplain." Typically, the 100-year floodplain is delineated on the

Flood Insurance Rate Maps prepared by the Federal Emergency Management Agency (FEMA) for regulatory purposes concerning flood insurance.

As described in the DEIR, FEMA maps indicate that portions of the Study Area are potentially vulnerable to flooding. The City of Cloverdale has adopted a Flood Damage Prevention Ordinance (Chapter 15.20 of the Municipal Code) and a "Primary Floodplain (FP) Overlay District" in its Zoning Ordinance, contained within Chapter 18.07 (Special Districts). The Flood Prevention Ordinance (Ordinance 507-96, adopted in 1996) was adopted in response to the Flood Insurance Study performed by the Federal Emergency management Agency (FEMA) in July of 1996. The purpose of the Ordinance is to protect human life and health; minimize public expenditures; minimize prolonged business interruptions; minimize damage to public facilities; maintain a stable tax base; ensure disclosure to potential purchasers of property; and ensure that those occupying structures within the special flood hazard areas assure responsibility for their actions.

The overlay zone established pursuant to Chapter 18.07 of the Zoning Ordinance establishes development standards within the floodplain areas delineated on the Flood Insurance Rate Map (Community Panel No. 060376-0001 C, revised July 1996) prepared by FEMA in its 1996 report titled *The Flood Insurance Study for the City of Cloverdale, California, Sonoma County*.

According to Chapter 18.07 of the City's Zoning Ordinance, the purpose of the "Primary Floodplain FP District" is to provide land use regulations for properties situated in floodways, and along creeks and streams to ensure an adequate open corridor to safeguard against the effects of bank erosion, channel shifts, increased runoff or other threats to life and property. The Primary Floodplain Overlay District can be combined with other districts contained within the Zoning Ordinance.

The areas within the City most prone to flooding are generally described below:

- Those areas along Cloverdale Creek from the northwest portion of the City south toward Cloverdale Boulevard, and easterly crossing University Street, Vista View Drive, Third Street, Second Street; Oakbrook Lane.
- The area between First Street and the Frontage Road to the Russian River.
- The area on both sides of the Russian River, extending approximately 500 feet east of the former Northwestern Pacific Rail Road track bed and easterly to the City Limits, and along the easterly limits of the City.
- Along Cherry Creek from the western City Limits running easterly to an area between Clark Avenue and the railroad tracks east of Highway 101.
- Along Porterfield creek from a distance approximately 600-feet west of Cloverdale Boulevard and easterly to Highway 101.
- The low-lying areas between Highway 101 and the Russian River, where the City's water treatment plant is located.

Section 8.20.070 of the City of Cloverdale Municipal Code requires a permit from the City for work that could impact natural watercourses within a defined buffer area along natural watercourses. Activities potentially requiring a permit include the placement of

structures, grading, fill, and planting of vegetation. The buffer area under this ordinance includes the toe of the bank at a slope of 2.5:1 to the maximum high water elevation plus thirty feet, or thirty feet from the top of the bank, whichever is greater. In addition, no permanent structures shall be built within a buffer area defined as the toe of the bank at a slope of 2.5:1 to the maximum high water elevation plus fifteen feet, or fifteen feet from the top of bank, whichever is less. As part of the permitting process, project applicants must provide a creek study analyzing project impacts to watercourse structure and flow and detailing bank stabilization, erosion control, and other watercourse protection measures included in the project.

Section 17.20.130 of the City of Cloverdale Municipal Code states that “project development shall not affect the natural course or riparian habitat of any stream. Mitigation measures shall be required where development may result in impacts in such areas.” Section 17.20.170 of the City of Cloverdale municipal code states that “whenever there is reason to suspect significant sensitive plant sites are located within the project site, an appropriate survey by qualified professionals approved by the planning director shall be required as part of any environmental review.”

General Plan policies PS 2-1, PS 2-2, PS 2-3, PS 2-4, PS 2-5, PS 2-6, PS 2-7, PS 2-8, PS 2-9, PS 2-10, PS 2-11, PS 2-12, PS 2-13, PS 2-14, PS 2-15, PS 2-16, PS 2-17, and PS 5-1 will adequately address flooding concerns within the City’s Study Area and would reduce potential the impacts related to this issue.

#### **Response to Comment A5-5**

The commenter notes that the Regional Water Board could provide the City with a GIS database which can be utilized for mapping sensitive areas, including wetlands. The commenter recommends that the FEIR contain policies and implementation measures aimed at enhancing water features.

While the City agrees with RWQCB that enhancing natural water systems within the city's sphere of influence is desirable, the City's responsibility in the CEQA EIR process is to identify and analyze the impacts of development envisioned under the General Plan Update, and to evaluate and adopt feasible mitigation for those impacts."

The General Plan Update contains many policies and implementation measures related to this comment, including:

*Implementation CDO 7-2.b - Preserve wetlands, habitat corridors, sensitive natural communities, and other essential habitat areas that may be adversely affected by public or private development projects where special-status plant and animal species are known to be present or potentially occurring based on City biological resource mapping or other technical material. Require biological resources assessment for development projects in areas identified or with potential to special status plant and animal species.*

*Implementation CDO 7-2.c - Protect sensitive biological resources and habitat corridors in CEQA review and participation in comprehensive habitat management programs, including continued acquisition and permanent protection of important natural habitats.*

**Response to Comment A5-6**

The commenter recommends that the City adopt an Urban Growth Boundary, a Hillside Ordinance, and a Grading Ordinance as soon as possible.

The City's General Plan Update contains polices and implementation in agreement with this comment.

**Response to Comment A5-7**

The commenter recommends that a clear explanation of jurisdictional regulations related to wetlands and waters of the State be included in the DEIR.

The City's DEIR contains lengthy discussions of the regulatory framework surrounding this issue. See Individual Responses A1-3; A1-4; A5-1; A5-2; and A5-3.

The General Plan Update EIR serves as a program EIR and does not approve specific development projects. As future development is proposed, the impacts of each individual future project on waters of the State, including wetland areas, will be fully evaluated and mitigated as part of the development application process. For unavoidable impacts to waters of the State, submittal of applications for 401 Water Quality Certification and/or Waste Discharge Requirements (Dredge/Fill) permits from the Regional Water Quality Control Board will be necessary. United States Army Corps of Engineers Clean Water Act Section 404 permits and Department of Fish and Game stream alteration permits may also be needed.

**Response to Comment A5-8**

The commenter discusses several issues related to the topic of storm water runoff associated with impervious surfaces, and the resulting potential impacts upon the watershed. For example, the commenter recommends the disconnection of impervious surface areas from storm drain systems and routing to vegetated areas prior to entering a waterway.

The City's DEIR and General Plan Update document address the issue of storm water management in several instances. The DEIR recognizes that new development under the proposed General Plan Update (or any of the Alternatives considered, including the "no project" Alternative) could introduce constituents into storm water that are typically associated with urban runoff. These constituents include sediments, petroleum hydrocarbons, pesticides, fertilizers, and heavy metals such as lead, zinc, and copper. These constituents would result in water quality impacts to onsite and offsite drainage flows to area waterways. The Russian River is included in the Section 303(d) list of impaired water bodies. Discharges of urban runoff into this river may contribute to the

existing impairment. The entire length of the Russian River within the GPU Study Area is listed by the State Water Resources Control Board (SWRCB) as impaired by sediment and temperature.

As previously mentioned, the City is not subject to the NPDES Phase II program with respect to storm water management. Where/when required, Storm Water Management Plans (SWMP) must include the following six minimum control measures:

- Public Education and Outreach on Storm Water Impacts
- Public Involvement/Participation
- Illicit Discharge Detection and Elimination
- Construction Site Storm Water Runoff Control
- Post-Construction Storm Water Management in New Development
- Redevelopment and Pollution Prevention/Good Housekeeping for Municipal Operations

Mitigation Measure MM 4.9.1 requires preparation of a Storm Drainage Master Plan that identifies drainage facilities needed to reduce or eliminate drainage problems as well as require the use of Best Management Practices that will eliminate or reduce the discharge of pollutants from construction sites to waters of the state and implement stormwater pollution prevention plans that document the selection and implementation of Best Management Practices for a particular construction project. Mitigation Measure MM 4.9.2 sets a City standard for future development related to storm water runoff – the cumulative rate of peak runoff must not exceed pre-development levels. This would limit the generation of higher peak runoff flows resulting from development, which could produce higher velocities for flow, which in turn increase erosion and sediment discharge. Best Management Practices, energy dissipation measures, stabilization measures, and onsite detention ponds can be applied to and incorporated into proposed development to limit the concentrations of these constituents in any site runoff that is discharged into downstream facilities. Mitigation Measure MM 4.9.3 requires that storm water data and requirements be included in the City's Subdivision Ordinance.

In addition, General Plan policies and implementation measures CDO 7-1, CDO 7-1.a, CDO 7-1.b, CDO 7-1.c, PS 2-3, and PS 2-4 are designed to ensure minimal surface water quality impacts related to development.

Also see Individual Response A5-1.

#### **Response to Comment A5-9**

The commenter provides two comments related to the subject of wastewater. First, the commenter recommends adoption of a water recycling program. Secondly, the commenter states that in their opinion, in order to implement GPU Policy LU 6-3, that the City needs to adopt an Urban Growth Boundary.

Policy LU 6-3 reads as follows: *Discourage development beyond areas with planned expansions of sewer, water, and road systems. Develop a growth phasing plan that addresses location and timing of development and infrastructure.*

In response, the City supports water recycling and conservation as reflected in the implementation policies listed below. It is also noted that the City anticipates upgrading its WWTP to provide an advanced (tertiary) level of treatment at some point in the future. However, a target date or schedule has not yet been set. It is not a condition of the City's current WWTP five-year NPDES Permit (issued by the State Water Resource Control Board). The City will be including an estimated cost for the upgrade in its Wastewater Master Plan Update to be completed in late 2008.

The following GPU implementation measures address the comments received regarding this issue:

*Implementation LU 6-1.b. Upgrade the City Wastewater Treatment Plan to provide tertiary treatment. Provide plumbing in new development so that tertiary treated water can be distributed for new development, open space, parks, and other uses.*

*Implementation LU 6-1.c. Promote water conservation and encourage water conserving landscaping. Adopt water conservation ordinances and mandatory landscaping ordinances if needed to respond to water supply issues.*

*Implementation LU 6-1.d. Maintain a Water Master Plan for evaluate adequacy of water supplies and to provide a framework for timed capital improvements, financing of improvements, and facility expansion.*

With respect to the comment regarding an Urban Growth Boundary, please see Master Response # 4.

### **Response to Comment A5-10**

The commenter speaks to four issues related to groundwater as follows:

1. Section 4.4, DEIR page 4.4-2 should include information regarding the Cortese List;
2. The former Masonite site is inaccurately mapped on DTSC's EnviroStor;
3. Correction of text on DEIR page 4.4-4 as follows: "Sonoma County, with oversight from the North Coast Regional Water Board, administers a cleanup program to address discharges from underground storage tank systems".
4. It is recommended that the GPU contain mitigation measures to require soil and/or groundwater management plans for closed and active cleanup sites if development is proposed in the vicinity.

In response, the City concurs with the commenter and will make the necessary corrections to the DEIR text. The City notes that regarding Item #1, information regarding the Cortese List is included in the DEIR, Section 4.4.1, Existing Setting.

With respect to Item #4, the DEIR contains the following information:

Table 4.4-4 lists federal, state, and local regulatory agencies that oversee hazardous materials handling and hazardous waste management, and the statutes and regulations that they administer. Other applicable state and local hazardous materials laws and policies are provided in Table 4.4-5.

Implementation of the proposed General Plan Update may result in known and unknown hazardous material being discovered or encountered at subsequent development sites. Known hazardous waste sites are identified in Table 4.4-1. Most of these sites involve issues of leaking underground storage tanks typically associated with past automobile-related activities located in proximity to U.S. Highway 101. Within the Study Area, there are 12 SLIC (Spills, Leaks, Investigations, and Cleanups) sites and 22 LUFT (Leaking Underground Fuel Tanks) sites with open files.

A GPU Policy and/or implementation measure requiring soil and/or groundwater management plans for closed and active cleanup sites if development is proposed in the vicinity is proposed as an addition to the GPU.

#### **Response to Comment A5-11**

The commenter reiterates information regarding existing regulatory standards and requirements.

[See comments regarding Response A5-7; The City agrees that this is pertinent information and as such, this information has been included in the DEIR. See Individual Response A5-1.

#### **Response to Comment A5-12**

The commenter summarizes by reiterating their recommendation to include more detailed mitigation measures to support polices. They also recommend public outreach and education programs.

The City emphasizes that they have prepared a program level DEIR which is appropriate for a project such as General Plan Update pursuant to CEQA. The City is confident that they have proposed adoption of adequate GPU policies and implementation measures which will effectively carry out the existing regulatory framework on the local, State, and Federal levels. Early in the process, the City made the decision to prepare a self-mitigating document thusly avoiding the need and possible ineffectiveness of a lengthy list of mitigation measures and associated monitoring requirements. The draft General Plan was formulated to minimize environmental impacts, with the goal that adoption of the General Plan would be the primary mitigation of impacts identified in the Environmental Impact Report. During the DEIR process, the General Plan Update document was modified to address environmental concerns which became apparent but have now been mitigated through effective policy and implementation programs. (See Revised GPU, September 2008)

The City's GPU contains several policies and implementation measures directed at public education and outreach in a variety of areas, including historical and cultural resources, proper use of storm drains, wildlife conservation, housing, and emergency services.

## **Responses – Organizations**

### **Letter O1. Citizens for a UGB (Urban Growth Boundary)**

#### **Response to Comment O1-1:**

The commenter recommends that a) the City adopt language into the General Plan specifying uses allowed within and outside of the proposed UGB, b) include an UGB map in the General Plan, and c) adopt language to protect hillside areas above 20% slope.

In response, the City has included a map showing the approximate location of the proposed UGB (see General Plan Update Exhibit 2.5). Implementation Policy LU 3-2.b requires the development of a hillside ordinance for any areas over 20 % slope that are within the UGB. (See Master Response #4 for more information related to the UGB).

Much of the discussion of the UGB and associated issues are outside the purview of the EIR and are strictly General Plan policy issues. (See Master Response #1).

### **Letter O2. Citizens for a UGB (Urban Growth Boundary)**

#### **Response to Comment O1-2:**

The commenter indicates that adoption of an UGB by voter approval is more effective than adoption by ordinance.

In response, the City General Plan Update Implementation Policy LU 3-1.a requires the adoption of an UGB Ordinance within 6 months of General Plan adoption, followed by the placement of the ordinance on the ballot of the first election following ordinance adoption. Much of the discussion of the UGB and associated issues are outside the purview of the EIR and are strictly General Plan policy issues. (See Master Response #1). (See Master Response #4 for more information related to the UGB).

### **Letter O2. Greenbelt Alliance**

#### **Response to Comment O2-1:**

The commenter acknowledges that the City's self-mitigating General Plan and associated DEIR are well thought out documents; however, it is recommended that more mitigation measures should be adopted as policies.

The writer's general comment above is elaborated on in the more specific comments in the writer's letter, which are responded to below.

#### **Response to Comment O2-2:**

The commenter expresses concerns regarding the proposed UGB.

In response, the City has prepared Master Response #4 which focuses upon the issue of the proposed UGB.

**Response to Comment O2-3:**

The commenter raises several issues related to adoption of an UGB as follows: a) the General Plan Update should include policy language directing that an UGB ordinance be adopted, followed by voter adoption; b) uses allowed within and outside of the UGB should be included in the General Plan Update; and c) the General Plan update should include an UGB map.

In response, the City concurs with Items (a) and (c) above, and has included policy language addressing these items. See Response OA 1-2, and Master Response #4. Any future proposed ballot measure will both adopt a UGB ordinance and amend the General Plan, so that the future ordinance becomes a part of the city's General Plan upon approval by the voters.

With respect to Item (c), the UGB boundaries are mapped (exhibit 2.5). That map will be revised to remove “illustrative” from the title.

**Response to Comment O2-4:**

The commenter is concerned about an increase of acreage designated *Conservation Features* in the proposed General Plan Update document and questions adequate analysis of this in the DEIR. The commenter continues to recommend that mitigation for this concern may be accomplished through the adoption of an UGB.

The City concurs with the commenter and has included adoption of an UGB as part of the proposed GPU. This is explained in several of the preceding comments, as well as Master Response #4. The *Conservation Features* land use designation reads as follows:

*The purpose of this designation is to manage and preserve valuable biological, visual, and agricultural resources in the Cloverdale Planning Area. Primary uses include river/stream-related recreation, open space buffers, and agricultural production. Setbacks of 50 feet from tributaries are encouraged, and between 300 feet to 1,000 feet around the Russian River.*

The City's DEIR has analyzed the potential program level impacts associated with potential development within the Study Area over the life of the Plan. See Response #4 for a complete discussion of issues associated with the proposed UGB.

**Response to Comment O2-5:**

The commenter expresses concerns regarding the potential conversion of agricultural lands given adoption of the proposed General Plan Update. The commenter recommends excluding the Asti area and adjacent vineyards from the proposed Sphere of Influence. The commenter recommends the following revised language be adopted by the City as policy:

*City Proposed Policy LU 6-3: Discourage development beyond areas with planned expansions of sewer, water, and road systems. Develop a growth phasing plan that addresses location and timing of development and infrastructure.*

*Commenter Proposed Policy LU 6-3: Plan expansion of sewer, water, and road systems to support development within the Urban Growth Boundary. Any expansion of sewer or water service to the UGB Exception Areas shall be provided with pipes sized at the minimum diameter necessary to serve the Exception Areas at buildout.*

In response, the City concurs that agricultural land is an important resource which needs protection. The City has placed a growth cap within the Plan in order to manage growth in the Cloverdale area and to help minimize impacts associated with growth. The proposed UGB recognizes existing uses and developed areas, and as such, provides the opportunity to comprehensively plan for continued development of these areas with minimal impact upon the surrounding agricultural lands. The City may consider a revision to proposed Policy LU 6-3 as suggested by the commenter in order to further define infrastructure expansions in these areas. Also, see Master Response #4 regarding UGB and Master Response #3 pertaining to Agricultural Lands.

**Response to Comment O2-6:**

The commenter expresses concerns related to potential impacts to riparian corridors. The commenter suggests adopting language which is similar to Sonoma County's General Plan as follows:

*Sonoma County Policy OSRC-8b: Establish streamside conservation areas along both sides of designated Riparian Corridors as follows, measured from the top of the higher bank on each side of the stream as determined by PRMD:*

- (1) Russian River Riparian Corridor: 200'*
- (2) Flatland Riparian Corridors: 100'*
- (3) Other Riparian Corridors: 50'\**

The City's GPU and DEIR contains policy language and analysis addressing this issue as described in portions of Master Responses #1, #2, and #4. Additionally, information related to riparian corridor protection has been included in the following individual specific responses: A1-1, A1-3, A1-4, A5-2, and A5-4.

**Response to Comment O2-7:**

The commenter recommends that the GPU designate future school sites.

In response, the City has included several GPU policies and implementation measures related to this item. The school district was consulted during the preparation of the GPU regarding the need for additional school facilities at this time and into the future.

Implementation policies and measures LU 5-1, LU 5-1a, LU 5-1b, LU 5-1c, LU 5-1d, and LU 5-1e have been included in the proposed GPU and are considered adequate to address any potential issues associated with school facilities.

**Response to Comment O2-8:**

The commenter has expressed a concern that the “base of hill’ line has not been delineated. They suggest that a) the General Plan contain policy requiring that a survey be prepared for projects located near the UGB line, and b) require landowners to donate conservation easements to the Open Space District on lands above 20% slope in exchange for the right to develop on the flat portion of the property. The following policies and implementation measures are taken from the GPU and address the commenter’s concerns:

*Policy LU 3-1: Develop an Urban Growth Boundary that allows urban development within the boundaries and does not allow urban development outside the boundaries. Urban development should be within the General Plan Study Area and below the “Base of Hill” as defined in Exhibit 2.2 except for the area to the south of Sandholm Lane extended and north of Bluxom Creek, where development may be allowed above the base of hill but behind the hill if the primary access road visible to the City is below the base of hill, and houses, night lighting, street lighting, and roadways above the base of hill are not visible from the balance of the City.*

*Policy LU 3-2: Expansion into hillside areas shall be consistent with the Conservation, Design, and Open Space Element, to eliminate or minimize visual, access or lighting impacts in hillside areas, particularly in the western hillsides.*

*Implementation LU 3-2.a. Amend the Zoning Ordinance to include provisions of Exhibit 2.2, including the provision for Base of Hill, net acreage, environmentally sensitive lands.*

*Implementation LU 3-2.b. Develop a hillside ordinance prior to any construction above base of hill if the Urban Growth Boundary allows hillside development.*

*Implementation LU 3-2.c. Coordinate with Sonoma County to assure that City hillside view policies are communicated and implemented in any County approvals.*

*Policy CDO 1-1: Urban development in the City will be on the valley floor, defined generally as the land below the Base of Hill. Development will be framed by and contained within agricultural lands to the north and south, the Russian River to the east, and below the Base of Hill (defined as the location where the valley floor transitions to a 20% slope or greater using 5 foot slope contours or less) on hillside areas).*

*Policy CDO 2-1: Adopt a hillside ordinance or a hillside provisions within the Zoning Ordinance to implement hillside development provisions.*

*Policy CDO 2-2: Where a parcel has land both below and above the Base of Hill, development rights to the hillside areas shall be transferred to the area below Base of Hill, and hillside areas will remain as visual open space with easements or other legal guarantees that include the City as a participant. Any hillside areas shall provide for trails as outlined in the Parks and Recreation Element.*

*Policy CDO 2-3: Where a property within the City as of the date this General Plan is adopted does not have lands below the Base of Hill, residential development above the Base of Hill may be allowed if:*

- *The development conforms to General Plan densities*
- *The residential use, including grading for roadways and lighting, will not be visible from the valley floor within the City because it is positively screened by topographic features.*
- *The residential use provides guarantees that the hillside areas will remain as visual open space with easements or other legal guarantees that include the City as a participant.*

*The open space areas provide for trails as outlined in the Parks and Recreation Element.*

## **Responses – Individuals**

### **Letter I1. Roz Katz**

#### **Response to Comment I1-1:**

The commenter expresses concern regarding the proposed designation of Foothill Boulevard as an Arterial.

In response, the City notes that Foothill Boulevard has characteristics which could justify either arterial or collector status, but not residential street status. Although it does not carry large volumes of traffic indicative of an arterial street, it does serve a long distance. The traffic volume and function may be more in line with a collector street designation. However, given that Foothill Boulevard is the only continuous parallel facility to Cloverdale Boulevard, its designation as an arterial street may be more prudent because of public safety functions.

### **Letter I2. James Wagele**

#### **Response to Comment I2-1:**

The commenter expresses concern regarding future development west of Foothill Boulevard.

In response, the City notes that the General Plan traffic analysis assumes development of all undeveloped properties which are zoned in the General Plan land use element. Traffic assignments of these undeveloped properties utilized Foothill Boulevard to gain access to Cloverdale Boulevard and US 101 interchanges as well as for longer trips to/from Treadway Drive. Therefore, impacts of these properties on the local circulation system were addressed in the traffic analysis. For local circulation, Foothill Boulevard is positioned as the only continuous link parallel to Cloverdale Boulevard. Therefore, its function in public safety issues also should be considered in addition to traffic volumes.

**Letter I3. John MacKie, Esq for Pacific States Industries, Inc  
Response to Comment I3-1:**

The Comment notes that Policy LU 1-4 states that there should be a buffer between industrial and residential uses, that there is a concern that the buffer between industrial uses west of the freeway and the proposed residential area east of the freeway in the McCray Road Area is not sufficient, and that notices and/or deed restrictions should be recorded on residential properties adjoining industrial uses informing of the right to industrial use.

In response, the EIR analyzed noise impacts related to industrial use in the mentioned area and found no significant impact. Other potential impacts would be speculative. It is noted that there is a minimum separation of 350 feet between the industrial area and the designated residential area, and that separation is a freeway and a rail line. Implementation LU 1-4a is performance based, requiring subsequent development to mitigate for the existing development (in this case, the residential development must analyze and mitigate for the existing industrial impacts). No further mitigation would be necessary in the General Plan, but will be analyzed and proposed in subsequent development review.

**Response to Comment 13.2.**

The comment notes that Implementation LU 1-4b may allow transfer of industrial designation from the west of the freeway to the east of the freeway, that Pacific States Industries would not want its land use to become non-conforming because of changes in land use outside of its control, and that the property owner would like flexibility in land uses in the future. This comment relates to General Plan policy rather than to the Draft EIR.

However, the land use policies for the Pacific States Industries Redwood Empire Asti Property would be General Industrial under the Urban Growth Boundary industrial exception area. The UGB will not allow changes in that designation during the UGB time frame (20 years). The General Industrial designation under the UGB industrial exception area is not controlled by property owner decisions on the west of the freeway. The UGB as proposed would not allow flexibility in land uses because of the nature of the UGB industrial exception areas. \

**Response to Comment 13.3.**

The comment notes that Policy LU 3-1 would allow continued industrial use under the UGB industrial exception area. It also requests that there be flexibility of uses with alternative to industrial use and that infrastructure, if installed to the site, be made available to alternative non-industrial uses. This comment relates to General Plan policy, rather than to the Draft EIR.

However, as noted in response to Comment 13.2, the nature of UGB exception areas as presently proposed would not allow alternative uses or infrastructure for alternative uses.

**Letter I4. Robert Sexton for Tyris Corporation**

**Response to Comment I4-1 through I4-14:**

**Comments 14.1 – 14-4, 14.11, 14-13, and 14-14.**

The comments are related to General Plan policies and not to the EIR. They are appropriate for review in the General Plan public hearings. Comments are noted.

**Comments 14-5 – 14-9** These comments generally ask that EIR text, charts, and maps be corrected for the Alexander Valley Resort project. Changes will be made, as shown in Section 4, "Minor Changes and Edits to the Draft EIR."

**Comment 14.12.**

The comment requests that the noise contours for aircraft use and policies for aircraft noise be modified to allow alternate noise standards if approved by the Airport Land Use Commission.

The request would allow ALUC to approve noise standards in conflict with the noise studies done for the General Plan. This could result in noise levels in excess of those evaluated in the Draft EIR, with a potential unmitigated adverse impact. The requested change is not consistent with the Draft EIR or General Plan policy and will not be made.

**Individual Oral Comments I5; John Doble – 11/5/08 PC Meeting**

**Response to Comment I5-1:**

The commenter stated that the proposed UGB should use parcel lines as the boundary and that the UGB should be the same as the Sphere of Influence.

This comment relates to General Plan policy, rather than to the Draft EIR. However, the City will consider both comments in conjunction with development of the proposed UGB ordinance. See Master Response #1 and Master Response #4.

**Individual Oral Comments I6; Diane Bartleson – 11/5/08 PC Meeting**

**Response to Comment I6-1:**

The commenter recommends more language be added to the GPU related to the UGB in order to ensure that the UGB ordinance is adopted and wants a guarantee that the line would not be amended in the future.

The City Council has already adopted a resolution approving an UGB, and directed that the approximate location be included in the GPU. The proposed ballot measure will both adopt a UGB ordinance and amend the General Plan, so that the future ordinance becomes a part of the city's General Plan upon adoption by the voters. Although the General Plan can be further amended, that would require a separate public hearing and approval process, and a voter-adopted amendment could not be changed except by another vote of the people. Also, see Master Responses #1 and #4.

**Individual Oral Comments I7; Dick Schwartz – 11/5/08 PC Meeting**

**Response to Comment I7-1:**

The commenter recommends that the City consider pre-zoning parcels within the Sphere of Influence and the UGB. Also, the City should consider provision of infrastructure to these areas.

In response, it is noted that the City's GPU proposes land use designations for the entire Study Area, which includes the SOI and the UGB. Additionally, the GPU addresses the provision of infrastructure to expansion areas, as well as the timing of said infrastructure development.

**Individual Oral Comments I8; Melanie Bagby – 11/5/08 PC Meeting**

**Response to Comment I8-1:**

The commenter supports the UGB as proposed by the City, and points out the importance of concentrating growth and protecting water supplies.

In response, it is noted that the City concurs with these points and has addressed these items in the GPU.

**Individual Oral Comments I9; Russ Peihl – 11/5/08 PC Meeting**

**Response to Comment I9-1:**

The commenter had questions related to the adoption process associated with the UGB.

In response, the City has outlined the procedure for adoption of the proposed UGB. The City Council has adopted a resolution in support of an UGB, and the GPU calls for approval of an ordinance, which will then be placed on the ballot for voter adoption. The proposed ballot measure will both adopt a UGB ordinance and amend the General Plan, so that the future ordinance becomes a part of the city's General Plan if adopted by the voters.



## CHAPTER 4

### Minor Changes and Edits to the Draft EIR

#### **Introduction and Project Description**

This chapter will provide any revisions that are made to the text of the Draft EIR. Modifications will be organized by chapter and a page number (referring to the original text's location in the Draft EIR) will also be provided. Text additions will be shown in underline and text deletions will be shown in strikeout.

#### **Revise second paragraph on page 2.0, Section 2.5 to include the following text.**

Because policies have been incorporated into the General Plan to avoid or reduce environmental impacts, the Plan itself is self-mitigating to the greatest extent possible. Many Plan policies therefore act as mitigation for impacts that would otherwise occur or be more severe. Where needed and feasible, additional mitigation measures (MM) have been proposed. The self-mitigating General Plan policies are included in the lists of MM in the following sections.

#### **Revise fourth paragraph on page 3.0-2 to read:**

The City Council received the recommendations of the Planning Commission and held public input meetings on the draft plan. The council considered land use changes related to issues. On May 9, 2007, the City Council released a draft "project" for EIR consideration.

#### **Revise first bullet of paragraph 4, page 3.0-33 as follows:**

- Revisions to the Municipal Code, including the Subdivision and Zoning Ordinances to update existing ~~resolutions~~ regulations ensuring consistency with the General Plan.

#### **Revise parkland acreage table 4.1.4 as follows:**

Park type	Existing City Parks	Total acres	Needed for 12,000 population	Additional acreage needed by 2025
Neighborhood Park.s	Tarman Park 0.5 ac Vintage Meadows 3.5 ac. Brookside Mini Park 0.2 ac.	4.2		
Community Parks	City Park 7.4 ac. Furber Park 6.0 ac.	13.4		
Active Open Space	River Park 10.3 ac. Porterfield Ck 10.0 ac. Clover Springs 5.6 ac.	25.9		
Community Center/Administrative 0.3 acres/1,000	Downtown Plaza 0.4 ac Senior Center 0.4 ac.	0.8		

Total 5 acres per 1,000 population		44.3	60 acres	15.7 acres
Open Space Recreation 1.5 acres/1,000 population	River Park 58.2 passive ac. (includes County land)	58.2	No standard established	

**Revise second and third paragraphs, page 5.0-42 as follows:**

This EIR identifies policies and local implementing actions which can assist in the reduction of GHG emissions. Mitigation Measure 5.0.1 requires the preparation of a Climate Action Plan with specific requirements for quantification of emissions data and targets for reduction. However, as noted above, the regulatory climate is presently evolving, and no air district in California has adopted a quantified threshold of significance for local GHG emissions. Not all anticipated State reduction measures have been adopted at this time, and there is a substantial level of uncertainty about their effectiveness and how they will apply to local governments. It is also difficult, if not impossible, to presently determine to what extent local reduction measures will affect statewide, national or global climate change. AB 32 commits the State of California to reducing its GHG emissions to 1990 levels by 2020. Buildout of the General Plan Planning Area, without accounting for State and federal GHG reduction measures and the potential benefits of new technology, would most likely result in local GHG emission levels which exceed 1990 levels. However, it is also probable that State and federal measures coupled with local GHG reduction programs and new technology will have a beneficial effect on GHG emission levels at General Plan Buildout.

The City’s General Plan policies and implementing actions listed above, State and federal reduction measures applicable in Cloverdale and the City’s Climate Action Program required by Mitigation Measure 5.0.1 can effectively reduce GHG emissions. However, because of the technical and regulatory uncertainties noted above, it cannot presently be determined to a reasonable degree of certainty that Buildout under the General Plan Update will not result in a substantial increase in GHG emissions compared to existing conditions. Because it is therefore not possible to conclude that Buildout will not result in a cumulatively considerable incremental contribution to the significant cumulative impact of global climate change, this impact is considered significant and unavoidable.

**Revise Impact 5.23, page 5.0-43 as follows:**

Impact 5.23 The cumulative impacts of global climate change may result in decrease in water supply, increase in air pollutants, and increase in health hazards. This could create significant cumulative effects.

**Revise second paragraph, page 5.0-44 as follows:**

While the General Plan policies and implementing actions would reduce the potential GHG emissions in the City, the effects of global climate change on the City are partly the

result of global GHG emissions. As noted in the discussion under Impact 5.22, technical and regulatory uncertainty surrounding GHG emission reduction efforts make it impossible to conclude that General Plan buildout in Cloverdale will not result in a substantial increase in GHG emissions over existing conditions in the City. However, it is probable that even the complete elimination of additional GHG emissions in the City through General Plan Buildout would not significantly alter climate change on a global scale because City emissions make up such a miniscule proportion of global GHG emissions. The CCCC report discussed above speaks of possible changes under a variety of scenarios by the end of the century, a time period far beyond the 2025 buildout horizon of the General Plan Update. For the purposes of evaluation under CEQA, specific impacts of global climate change within Cloverdale as of 2025 are incapable of determination with any degree of certainty based on available information. As is noted under Impact 5.22, it is also not possible to determine whether any increase in local GHG emissions resulting from buildout will make a cumulatively considerable incremental contribution to those effects. Because it is therefore not possible to conclude that buildout will not result in a cumulatively considerable incremental contribution to the potentially significant cumulative impacts of global climate change on the City, this impact is considered significant and unavoidable.

### **Minor Changes to the Environmental Analysis**

#### **I. Sonoma LAFCO - Response to Comment A3-4:**

The commenter recommends that specific properties under Williamson Act contract be identified. The City will include a map as part of the FEIR which will identify contracted lands, and provide an acreage summary. Impacts are not anticipated to change, see Master Response #3, Agricultural Land, which addresses potential agricultural land conversion issues in detail.

*Revision: New **Figure 4.2-3** titled “Williamson Act Land” will be added to the EIR and will appear on page 4.2-10.*

#### **II. Sonoma County PRMD - Response to Comment A4-1**

The commenter notes that references in the Cloverdale GPU DEIR to the “Draft Sonoma County General Plan” should be changed to “GP2020” as the County General Plan has been adopted. Commenter noted and the City concurs and will revise the EIR as needed.

*Revision: “~~Draft Sonoma County General Plan~~” replaced with “GP 2020” throughout EIR.*

#### **III. Sonoma County PRMD - Response to Comment A4-2:**

Commenter notes that the City of Windsor was omitted from the DEIR Section 4.1.1. Commenter noted and the EIR will be revised accordingly.

*Revision: The City of Windsor will be added to the list of cities found on DEIR page 4.1-1, Section 4.1.1, Regional Setting.*

**IV. California Regional Water Quality Control Board, North Coast Region - Response to Comment A5-2:**

The commenter states that the DEIR only considers three creeks, and the Russian River, to be significant within the Study Area. DEIR Figure 4.10-2 illustrates the known wetlands and streams present within the study area and vicinity. This figure is not meant to be a comprehensive account of all waters, including wetlands, within the study area. The City notes the comment by RWQCB and will revise the Draft EIR to include a clarifying statement that there are other creeks, drainages, etc in the Study Area in addition to the four listed in the current DEIR.

*Revision: DEIR Section 4.9.1 - Existing Setting: Local Surface Water Features, page 4.9-1. Underlined text will be added.*

*The City of Cloverdale is located in the Alexander Valley Groundwater Basin. The Study Area includes one (1) major river, the Russian River, and three (3) significant creeks, Cloverdale Creek to the north, Porterfield Creek to the south, and Cherry Creek near central Cloverdale. There are also other creeks and drainages existing within the Study Area which carry varying degrees of water and support a range and variety of wildlife habitat.*

**V. California Regional Water Quality Control Board, North Coast Region -**

**Response to Comment A5-10:** The commenter points out that the former Masonite site is inaccurately mapped on DTSC's EnviroStor. Also, a correction of text on DEIR page 4.4-4 is needed as follows: "Sonoma County, with oversight from the North Coast Regional Water Board, administers a cleanup program to address discharges from underground storage tank systems". These changes will be made to the EIR.

**CHAPTER 5**  
Report Preparation

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**PMC**

EIR Project Advisor ..... Chris Stabenfeldt

EIR Project Director ..... Ignacio Gonzalez

EIR Project Manager ..... Gary Pedroni

Cultural Resources ..... John Nadolski; Tina Pitsenberger

Biological Services Director ..... Joyce Hunting; Elaine Flock

Fiscal Analysis ..... Derek Wong; Julia Light

GIS Graphic Production ..... John DeMartino; Robert Noyes

Air Quality Analysis ..... Doug Kim; Jeremy Bailey

Climate Change ..... Mike Martin; Seth Meyers

Creative Services Document Production ..... Roxanne Perry

Environmental Planner ..... Terry Farmer

Environmental Planner ..... Kim Voge

**W-Trans – Transportation Consultants**

Transportation Engineers ..... Steve Weinberger; Chris Meyers

**Bollard - Noise Consultants**

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